



***Telenor ASA***  
***Equality statement***  
**2024**

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# *Telenor ASA*

# *Equality statement*

# *2024*

In Telenor ASA, we work for diversity and inclusion and against all discrimination on the basis of gender, pregnancy, parental or adoption leave, care responsibilities, ethnicity, religion, beliefs, disability, sexual orientation, gender identity, gender expression and any combinations of these grounds. We also work against harassment, sexual harassment, and gender-based violence.

This statement represents Telenor ASA as an employer in Norway in line with Norwegian reporting requirements in The Equality and Anti-Discrimination Act, section 26. Telenor Norway presents its own report.

The statement consists of two parts.

**Part 1:** The factual status of gender equality in Telenor ASA and

**Part 2:** How we work to ensure equality and non-discrimination in practice.



# Part 1: The factual status of gender equality

The factual situation on gender equality in Telenor ASA for the period January-December 2024 is presented in the following.

## 1. Gender representation

This summary includes all permanent and temporary employees of Telenor ASA as of December 31, 2024, totalling 313 employees, primarily based at the Telenor headquarters in Fornebu.

Position categorization is based on levels ("bands"), defined across Telenor ASA's organizational units. This categorization considers several factors, including the position's responsibilities, impact, complexity, and required experience and education. For more information regarding position levels and categorization, please refer to the appendix.

According to the reporting requirements we report on gender pay differentials and involuntary part-time every other year, and this will be included in the Equality statement for 2025.

### Gender representation

		2024			2023			2022		
		Women	Men	N	Women	Men	N	Women	Men	N
Total	% of all employees	43	57	313	40	60	286	39	61	309
Group Leadership Team (GLT)	% of employees	50	50	6	60	40	5	60	40	5
Senior Leaders (TTL)	% of employees	50	50	26	43	57	28	53	47	19
Band A	% of employees	34	66	67	22	78	60	17	83	63
Band B	% of employees	43	57	70	40	60	62	41	59	68
Band C	% of employees	35	65	79	39	61	76	35	65	78
Band D	% of employees	50	50	38	42	58	31	45	55	47
Band E/F	% of employees	74	26	27	75	25	24	76	24	29

As of year-end 2024, women represent 43% of the workforce at Telenor ASA. Within the Telenor Group Leadership Team, three out of the six members from Telenor ASA are women.

At the senior management level, Senior Leaders, women represent 50%, an increase from 43% in 2023. At the VP level (band A) female representation increased by 12 percentage points over the past year, from 22% to 34%.

It is important to us to continue our efforts to strengthen the women representation in our leadership pipeline and the other manager and expert levels, and to move closer to gender parity at all levels.

Telenor ASA offers a defined contribution pension plan with company contributions for pensionable earnings up to 12G (G is the national insurance basis amount), with individual investment selections. Telenor also has a closed defined benefit pension plan limited to pensionable earnings of 12G, the plan was closed for new entrants in 2006. All new hires since 2006 are enrolled in the defined contribution plan.

## 2. Temporary employees, actual part-time and parental leaves

The gender distribution has been mapped in terms of temporary employment, actual part-time work, and parental leaves.

		2024		2023		2022	
		Women	Men	Women	Men	Women	Men
Temporary employees	% of all employees	0.6	1.3	0.3	0.7	1.6	0.6
Actual part-time	% of all employees	0.3	0	0	0	0.3	0
Involuntary part-time <sup>1)</sup>	% of all employees	-	-	0	0	-	-
Parental leaves	number of employees	12	12	9	10	6	5
Parental leaves	avg. number of weeks	22.0	9.5	16.8	12.6	20.0	12.1

<sup>1</sup> Involuntary part-time is reported every other year

In 2024, 24 employees took statutory parental leave (ref. Working Environment Act section 12-5). On average, women took 22.0 weeks of leave, while men took 9.5 weeks. However, these averages may only represent part of the full leave period, as they are based on the number of weeks taken within the calendar year 2024.

Given the regulations flexibility in how parents divide their leave Telenor ASA is focused on ensuring that men have equal opportunity, and acceptance, for taking parental leave.

### 3. Sick leaves and recruitment

#### Sick leaves

The sick leave rate for Telenor ASA employees was 2.2% in 2024, compared with 2.3% in 2023. For women, the sick leave rate was 3.1%, a decrease of 1.1 percentage points from the previous year. For men, the rate was 1.5%, reflecting a 0.3 percentage point increase from 2023.

There is minimal recorded absence related to child or child carer illness. This is likely due to Telenor's Flexible Way of Work, which allows employees to work, to some extent, during the illness of children or child carers. However, it is important to us that no employees feel pressured to work while caring for their children at home.

#### Recruitment

In 2024, Telenor ASA recruited 43 new employees, with women making up 65% of these new hires. This represents an increase from 46% in 2023. Specifically, among external recruits for positions within Technology, 58% were women. Additionally, for managerial positions, 80% of external recruits were women.

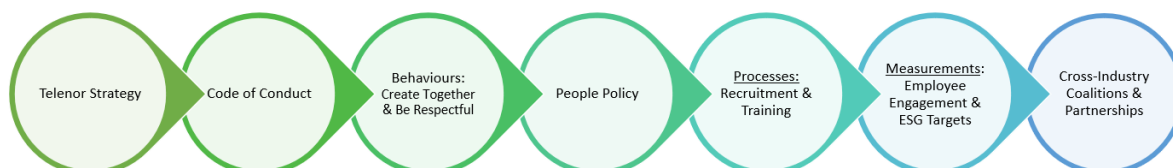
This positive trend is encouraging and aligns with Telenor ASA's ongoing ambition to increase female representation within specific levels and areas of our organization. Telenor ASA remain committed to this focus area and will continue to prioritize efforts to achieve greater gender balance across all levels.



# Part 2: How we work to ensure equality and non-discrimination in practice

## 1. Principles, procedures, and standards to promote diversity and inclusion and to prevent discrimination

Diversity & Inclusion is embedded in Telenor's business through:



Telenor ASA is committed to Telenor Group's People Policy, where diversity and inclusion are a vital part, including in the Code of Conduct which states that:

- *"All employees deserve a workplace environment, independent of work location, that is free from harassment, intimidation, discrimination, or threats of violence for any reason, including actions based on gender, sexual orientation or identity, race, ethnicity, disability, national origin, religious or cultural beliefs or citizenship.*
- *We view employee diversity as a competitive advantage, as it broadens our perspective and allows us to better understand our customers' needs and wants.*
- *Telenor does its utmost to actively promote equality in all employment practices.*
- *We foster a working environment where people are treated honestly and professionally and are valued for their unique ideas and differences".*

All Telenor employees are required to sign-off the Code of Conduct on an annual basis. This is done as part of a mandatory training in the understanding of the Code, which includes dilemma training.

Violations of the Code of Conduct and other guidelines shall be reported to the immediate line manager or to Telenor's integrity hotline. How comfortable our employees are in reporting violations to the Code of Conduct if they were to observe any, is measured as part of our yearly employee survey. In the 2024 survey, 80% of Telenor ASA employees answered positive on this question. 12% answered neutral, while 8% answered they were not comfortable to report any observations.

Telenor ASA is comprised by Telenor's whistleblowing procedures, which includes the Integrity Hotline, where violations of Telenor's guidelines can be reported anonymously if desired. Incidents reported to the Integrity Hotline are followed up by the company's independent internal audit and investigation unit. All incoming reports to the Integrity Hotline are assessed by Group Internal Audit & Investigation (GIAI) and further handling is decided upon based on their assessment. This applies to all negative or reprehensible incidents, including those concerning equality. During 2024, two cases have been reported and investigated. The cases have been followed up according to applicable routines.

Telenor ASA is bound by collective bargaining, collective agreements, and local agreements between Telenor ASA and EL og IT, NITO, Tekna and Negotia. The collective agreements also include provisions for equality and diversity. Telenor ASA has an active collaboration with all four unions and follows up the obligations in the collective agreements in close cooperation with them.

## 2. This is how we work to identify risks of discrimination and barriers to diversity and inclusion

### Overall structure for the Diversity & Inclusion agenda

Telenor ASA's management and the union representatives are committed to complying with our internal policy documents, which includes the diversity and inclusion area. Diversity, equality and inclusion related themes and issues are addressed as an integrated subject in various meeting arenas between management and elected representatives, who regularly meet with an open agenda, both formally and informally, at various levels of the company.

Telenor's Working Environment Committee (WEC) is established in accordance with the Norwegian legislation and plays a crucial role in addressing topics related to health, safety, and the working environment. The WEC in Telenor ASA met 4 times in 2024. Relevant topics that were discussed in WEC meetings in 2024 are:

- Follow-up of the annual HS&S wheel, including annual safety rounds, HS&S risk assessment and follow-up of defined actions and activities
- Follow-up of employee surveys
- Revised policy for Alcohol and Drug abuse
- General HS&S updates
- HS&S activities, such as World Mental Health Day campaign the 10 October and Health & Safety training for managers
- Sick leave rates

Telenor ASA established in 2023 an annual wheel for Diversity & Inclusion (D&I) which is based on the four-step model for Active equality work in section 26 of the Equality and Anti-Discrimination Act. Together with our local union representatives we have defined an annual process with four meetings a year dedicated to follow up the four-step model. This ensures continued focus and collaboration on these topics and comes in addition to the already established formal and informal meeting forums.

During 2024, 3 D&I meetings were held with the union representatives. In these meetings different topics related to risks and hazards, activities and focus areas, for diversity and inclusion were discussed. We will continue our efforts to establish a good process for this in the coming year.

Telenor ASA has a structured process for managers to follow-up their teams through the year, called People Dialogue. This process includes appraisals, goalsetting, and defining development plans for employees individually, in accordance with the People policy and without any form of discrimination.

Telenor has its own learning platform, Telenor Academy, with a considerable amount of training material covering gender equality, diversity and inclusion for employees and managers. D&I is also embedded in our Leadership programmes.

Telenor emphasise women representation and prioritise gender balance as part of our strategic ambition for diversity and inclusion. This is expressed through the goal of 40% women senior leaders by 2025. Telenor is committed to the UN Standards of business for LGBTIQ+ rights that sets standards of conduct for business tackling discrimination against LGBTIQ+ people. We support employee networks and many local events, such as Pride celebrations.

### We discovered the following discrimination risks and barriers to diversity and inclusion

Telenor ASA are obliged to follow the statutory four-step model for Active Equality Work. Our employee engagement survey, Our Voice, is an important mapping tool for uncovering discrimination risks and barriers to equality. The survey is conducted globally each autumn. In addition, several smaller pulse surveys are carried out during the year. In addition to the employee surveys, cooperation with the union representatives and WEC is very important to understand issues and challenges concerning the work environment, sick leave rates and any equality issues.

The latest employee survey was conducted in the autumn of 2024. In the following table are some examples showing how employees perceive the overall equality situation in the company.

	2024			2023			2022		
	Positive	Neutral	Negative	Positive	Neutral	Negative	Positive	Neutral	Negative
I feel able to be myself at work	88	7	5	88	8	4	84	11	5
Opportunities for development are available to everyone, regardless of gender, nationality, age, physical ability, personal background, or any other discriminatory factor	79	14	7	80	12	8	73	16	11
I have the flexibility I need to manage my work and private life	87	8	5	87	6	8	84	10	6
It is common practice in team meetings to ensure everyone has the opportunity to voice their opinion and be heard	83	11	6	-	-	-	-	-	-
I can freely express my views without fear of negative consequences	75	15	10	76	14	10	75	12	12

Although most employees respond positively or neutrally to these questions, and the results are relatively stable, it is important to identify the need for measures to make changes for those who answer negatively. Further discussion and mapping of causes, as well as the implementation of relevant measures based on the results, are handled by the management team and locally in each department.

Our analysis indicates that the risk factors for gender equality at Telenor ASA have remained largely the same as last year. Specifically, we observe the following:

- We still have a significant gender imbalance in the technology area.
- There is a relatively high gender imbalance in many areas, with a predominance of men in mid-level management and expert roles, and a predominance of women in the more operational and administrative positions.
- We continue to face a challenge with having sufficient number of women in our leadership pipeline.

### Possible causes of risks and hazards

We have found the following possible causes of risks and hazards in the assessments:

- There is a low proportion of women in the technology area, where traditionally fewer women pursue education and apply for positions.
- There is considerable competition in the market for qualified labour in several important areas of the company's business, particularly in technology.

## We have initiated/implemented the following measures in 2024

Both in 2024 and in 2025, Wellbeing & Inclusion is defined as one of three overarching focus areas in Telenor ASA from the employee engagement survey. The ambition is to foster a supportive and inclusive workplace that prioritizes employee wellbeing and to encourage open communication and promoting authenticity at work. We are focusing on enhancing psychological safety and to promote a culture of inclusivity where diverse perspectives are valued and respected.

To measure if our employees consider it a common practice to let everyone voice their opinion and be heard in team meetings, an additional question related to this was added in the employee engagement survey for 2024. On this question 83 percent of respondents answered positively, 11 percent neutrally and 6 percent negatively.

During 2024 several workshops dedicated to advance the understanding of diversity and inclusion and psychological safety have been conducted. Amongst these are:

- D&I awareness workshop with the Group Leadership team
- D&I and Unconscious bias workshop for all managers in the group functions
- Session on building psychological safety at a meeting for Telenor Work Council - Europe

### Gender

Telenor is a proud partner of the SHE Community. In the SHE Index 2024, a voluntary assessment of company performance on gender balance, gender equality policies, and diversity and inclusion, Telenor was recognized as one of the Top 5 companies in Norway.

At the SHE Conference in March, Telenor hosted an Executive Workshop alongside Inclusion Workshop for Young Talents in Norway.

During 2024 we continued our partnership with ODA Network to support women in science and technology careers along with an internal network to further create awareness on the subject.

On the International Women's Day 8th of March, our L&D department promoted micro learnings on Telenor Academy on personal development and leadership skills to share inspiration.

### Disabilities:

Telenor ASA actively endorses the Open Mind programme, initiated and operated by Telenor Norway. This programme promotes the inclusion of groups that have been marginalized in the labour market, in collaboration with the Norwegian Labour and Welfare Administration (NAV). It targets two main groups: individuals with disabilities and those with an immigrant background from countries outside the EU. The programme spans one year and includes internships across various parts of the company, significantly contributing to our inclusive culture. During 2024, Telenor ASA employed 12 candidates from the programme. Some of them started late in the year and will continue into 2025.

Our model for flexible way of work allows employees to choose their work location more frequently, which is particularly beneficial for employees with disabilities. This flexibility can contribute positively to increasing their ability to work.

### Ethnicity:

Telenor ASA is proud of its high level of ethnical diversity, with employees from various nationalities and cultural backgrounds. This diversity enriches our culture and fosters greater understanding and interaction across Telenor Group's business units and the markets in which we operate. By using English as the corporate language, we help ensure that employees with non-Norwegian backgrounds feel included.

Our mobility programme allows employees to work on assignments abroad for shorter or longer periods in the various business units. We actively encourage women to take on international assignments. To reduce possible obstacles for women to take on such assignments, we have over the years improved the coverage of nursery, kindergarten, and school for accompanying children as well as improved spouse's support for career advice, education, and upskilling.

Additionally, our global internal labour market offers employees the opportunity to apply for positions across national borders.

For more information on our efforts to support immigrants with a non-EU country background please refer to the section on the Open Mind programme under the heading Disabilities.

### Religion/beliefs:

There is a diverse representation of religions and beliefs amongst employees in Telenor ASA and it is important for us to facilitate celebration of religious holidays. In our canteens, we also emphasise offering a varied menu, adapted to employees with different religious affiliations. Employees at the head office at Fornebu have access to a prayer room.

### Sexual orientation, gender identity and gender expression:

All employees in Telenor ASA should work free from discrimination based on sexual orientation, gender identity or gender expression.

In 2024 we partnered with Telco Pride virtual conference to create awareness and alliance with LGBTIQ+ community amongst Telecom companies.



## Further information on human resource areas

### Recruitment

Telenor ASA is dedicated to fostering a diverse and inclusive workplace, with a strong focus on recruitment activities. We strive to ensure that the final rounds include candidates of all genders, a practice monitored by the recruitment team in collaboration with the hiring manager. When engaging external recruitment partners, we ensure they share our commitment to gender balance and diversity.

Vacancies within the company are always advertised internally first. Our global internal labour market provides employees with the opportunity to apply for positions across the company and national borders.

### Compensation and working conditions

Telenor ASA have personnel policy guidelines and collective agreements that ensure equal treatment of employees, regardless of background and statutory discriminatory grounds, for example in terms of compensation levels and salary reviews.

The company has conducted salary negotiations with all four unions and provided managers with guidance on distributing salary review budgets in an equitable way, including for employees on parental and sick leaves.

Telenor ASA covers the full base salary and does not limit payments to 6G in the event of illness.

We also cover the full base salary during parental leaves and additional compensations such as bonus are kept during the leave period. This approach helps to mitigate gender pay differences as women usually take more parental leave than men. Fathers and co-mothers keep full pay in the two weeks' leave in connection with the birth of their child.

All employees and managers in the company are offered training regarding diversity and inclusion on our e-learning platform. Telenor ASA offers regular health, safety, and environment (HSE) courses for managers and HSE managers in all companies.

### Opportunities for development and promotions

Telenor ASA places great importance on developing new competencies and new perspectives. Providing our employees opportunities for development has been and will continue to be a strategic focus area and a key performance indicator.

We ensure that everyone should have the same development opportunities regardless of gender, nationality, age, physical abilities, personal background, or other possible causes of discrimination. This is measured annually in Telenor's Employee Engagement & Enablement Survey - Our Voice, and most employees report that they believe development opportunities are the same for all, regardless of their background.

As part of our People Dialogue process, employees create their own development plans in consultation with their manager. For many years, Telenor has offered all employees 40 working hours each calendar year for their own learning and development.

Employees are offered various management development courses and advancement programmes.

The leadership teams conduct annual People Forums, where career development for team members is one of the topics. There is continuous focus on enhancing female representation in our leadership pipeline and increasing the proportion of women being promoted.

### Work life balance, care responsibilities, parental and birth/adoption leave

We continue to offer our employees flexibility regarding their work location. Employees can to a large degree, within a certain framework, choose where they want to carry out their work. The model has been developed over the years in cooperation and discussions with the unions.

We believe that increased flexibility is beneficial, helping ease the combination of work and family life, care responsibilities, getting children to and from kindergarten, as well as the ability for employees with chronic illness or disabilities to work.

### Work against harassment, sexual harassment, and gender-based violence

Telenor ASA has its own Compliance function and whistleblowing routines for reprehensible incidents, including for harassment in various forms. Incidents can be reported via the Integrity Hotline, available to all employees. One of the two reported cases to Integrity Hotline in 2024 was concerning this area.. The case was followed up according to applicable routines.

## Planned measures for the coming year

As part of our action plan, we will work towards identifying and outlining a plan for 2025 to revitalize the Diversity & Inclusion agenda for Telenor Group, including Telenor ASA. Strengthening partnerships and platforms, such as SHE Community, Oslo Pride, and Oda Network, remains a key focus.

We will continue to focus on enhancing psychological safety and to promote a culture of inclusivity where diverse perspectives are valued and respected.

Our aim is to leverage and re-establish collaborations with large Norwegian companies and the telecom sector to create awareness and allyship with under-recognized communities, including LGBTIQ+ individuals and people with disabilities. We also encourage and support employee resource groups and internal networks that aims to foster a diverse, inclusive workplace.

Additionally, we will revitalize D&I training, both online and offline, through the Telenor Academy to increase awareness and reduce bias.

We aim to secure equal pay across all functions and levels of the company and will continue our analyses of gender pay differentials. Where unexplained pay differentials between men and women are discovered, measures will be considered.

We will continue our strong focus on upskilling and competency shift to meet future needs and to deliver on our strategy.

Our goal is also to further develop and improve the D&I annual wheel for Telenor ASA together with our union representatives to ensure a more structured and enhanced process in line with the four-step model.

### 3. Assessment of results and expectations concerning further work on the agenda

Currently, women represent 43% of the employees at Telenor ASA. Recognizing the gender imbalance at certain levels and areas within the organization, we are committed to actively sustaining and improving gender balance across all levels and areas. Although we see a positive development in the gender representation in many areas the last year, our focus will remain on recruiting and retaining women, particularly in expert and leadership positions at higher levels and in traditionally male-dominated areas.

Our process for People Dialogue is an important tool for further developing the company. It ensures that all employees have an active development plan that is continuously maintained and updated to meet the company's current and future competency needs. We see this as a vital measure for improving gender balance in the company, by planning adaptive measures to prepare women for senior leadership and advanced expert roles in higher position levels.

Our employee survey shows that most employees believe that everyone in the company has equal opportunities, regardless of gender, nationality, age, physical health, personal background, or other possible causes of discrimination. Similarly, most employees feel they can be themselves at work. The results have been rather stable over the last couple of years. However, there is room for further improvement, and we will continue to work on fostering a supportive and inclusive workplace where employees feel psychologically safe and thrive.

Telenor ASA is positive to hiring candidates from Telenor Open Mind and other external or public work training programmes. We consider Telenor's Open Mind programme to be an important contribution toward equality, not only in the company, but also at the societal level.

Overall, we consider the state of equality in Telenor ASA to be at a high level. Through the coming revitalized agenda for D&I in Telenor, our partnerships with different organisations and cross-industry coalitions, and a more structured approach through our local D&I annual calendar, we believe we can enhance our equality work even further in the coming year.

Fornebu, 19 March 2025  
Board of Directors, Telenor ASA

# Appendix

## Description of position levels (“bands”)

### Group Leadership Team (GLT)

This group includes Group President & CEO and the other members of the Group Leadership Team (Executive Vice Presidents - EVPs) employed by Telenor ASA.

### Senior Leaders (Telenor Top Leaders - TTLs)

This group includes senior management roles for a group unit or a larger functional area within such a unit. The positions are defined as Senior Vice Presidents (SVPs). These are roles that establish long term global strategies or management principles for Telenor Group within their functional area. Decisions are guided by Telenor’s strategic direction and ambitions. The positions are part of Telenor Top Leaders, and they report to members of Group Leadership Team.

### Band A

This group includes management and expert roles for a group unit or a functional area within a group unit. The positions are defined as Vice Presidents (VPs). The management roles can be described as senior management roles (TTL-1) with responsibilities for establishing and implementing plans to achieve the company’s overall strategies and ambitions, as well as setting goals within their own functional areas. The expert roles are recognised as a position of senior expertise in one or more key functional areas where expertise is leveraged across Telenor’s global organisation to achieve significant business impact.

### Band B

This group includes management and expert roles responsible for a functional area or a sub-area within a function. The roles in this group are mainly defined as Director roles. The roles contribute on the strategic/tactical level by planning and implementation of strategic initiatives. The management roles are defined as senior management responsible for deliverables and results for own units. The roles are responsible for resources, policies, and guidelines, as well as processes within their area of responsibility. The expert roles at this level are senior positions that require specialised depth and/or scope of expertise in their own field. The roles interpret complex internal or external business problems and recommend solutions/best practices based on basic understanding and market insight.

### Band C

This group includes senior expert and specialist roles that have functional professional responsibility within areas of great impact. The roles require depth and/or breadth of competence within own area. The roles contribute on the tactical level with the planning and implementation of strategic initiatives and/or recommend solutions/best practices for complex internal or external business problems.

### Band D

This group includes expert and specialist roles that have functional professional responsibility or partial responsibility. The roles require a high level of specialised knowledge and experience in their own field or broad competence in several related disciplines. The roles at this level are responsible for delivering and implementing action plans within their area of expertise.

### Bands E and F

This group includes specialists working at the operational level with the implementation of action plans, identification and solving problems and providing recommendations within their own field. The roles require a high level of knowledge and experience in their discipline.