

# Sustainability Policy 2022





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## 1. Scope and Ambition of the Sustainability Policy

The TDC NET Sustainability Policy establishes the principles which guide the company to improve its environmental performance. It is intended to guide all employees, both full and part-time, partners and suppliers in achieving TDC NET's sustainability objectives and improve the performance. Moreover, it provides a common reference framework for the establishment of goals and the taking of actions to secure the outcomes expected. This policy has been developed in accordance with international standard ISO 14001 and applies to TDC NET and its operations in Denmark.

## 2. Sustainability in TDC NET

TDC NET's Sustainability Policy outlines the overarching sustainability scope, ambition and commitment, strategic priorities, governance, monitoring and reporting. As a national, digital infrastructure provider, TDC NET is committed to run their business in a responsible manner by contributing to sustainability. In TDC NET, we appreciate that we have an important role to play in operating responsibly, based on our heritage and the role we play in society.

### 2.1 Commitments

At TDC NET, we are committed to take a proactive approach to operating responsibly, which includes, at minimum compliance with all relevant laws and regulations but is more extensive than this. TDC NET has been a signatory to the UN Global Compact since 2009 and aligns the work with the UN Sustainable Development Goals (SDGs), to maximise the positive impact and reduce the negative impact. TDC NET has identified 7 SDGs, aligned with the goals and priorities for the future. This policy outlines TDC NET's continuous approach to comply and actively work with the 10 principles and identified SDGs.

### 3. Strategic Priorities

Sustainability is an integrated part of our corporate strategy and what we call “Network Champions”. TDC NET’s sustainability strategy is based on a [materiality assessment](#) (page 17), which follows the principle of double materiality and considers our strategic business priorities, our values and core competencies.

The strategy consists of five elements. In the image below, we present the key targets in each of our 5 strategic priorities on sustainability, for TDC NET. Also, the progress in 2021 is described together with the connection to the relevant SDGs for each of the strategic priorities.

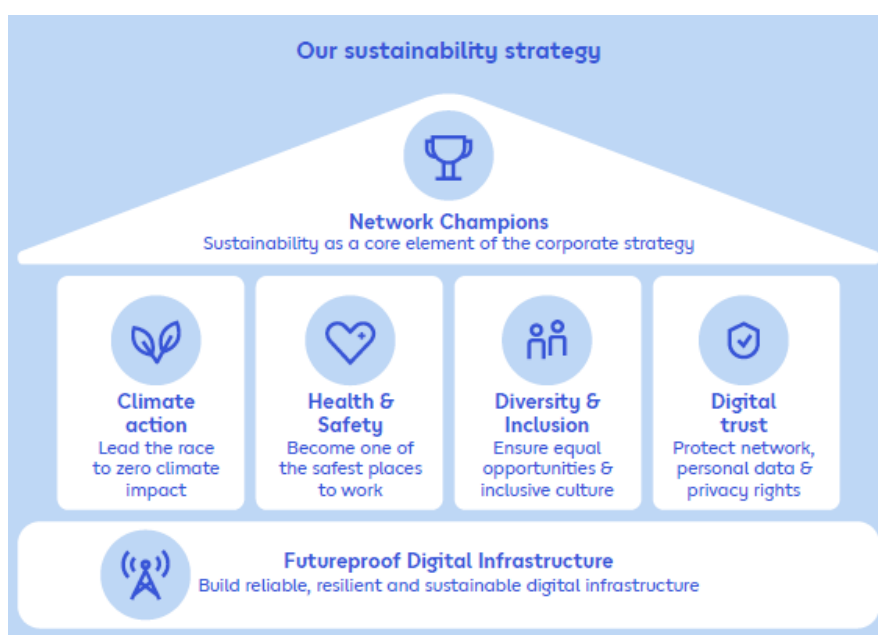


Figure 1: Strategic sustainability priorities for TDC NET

### 4. Human Rights

At TDC NET, we are committed to respecting human rights, and we work to prevent any kind of modern slavery or child labour in our business and our supply chain.

TDC NET relies on a vast number of suppliers and subcontractors in other countries. Ensuring that human rights are preserved across the supply chain requires intensive actions, for example, audits of supplier locations and commitment to the [Code of Conduct](#) for both employees and suppliers. As this risk also relates to data privacy and security, it is very important to ensure that the laws on data protection are respected. To mitigate our risks concerning human rights, we have established an array of activities both internally and externally.

#### 4.1 Freedom of Association

At TDC NET, we have a strong focus on avoiding all forms of forced and compulsory labour. Child labour shall strictly be prohibited as defined by ILO-IPEC and of Article 32 of the United Nations Convention on the Rights of the Child (UNCRC). Moreover, all forms of forced, bounded, indentured, compulsory labour, slavery, or human trafficking is avoided. We work with our peers and conduct audits of suppliers' locations to ensure that human rights are protected. Our Suppliers shall ensure that workers involved in the delivery of products and services to TDC NET have the right to form and join trade unions and collectively bargain in accordance with the national law. Suppliers shall establish relations of collaboration and mutual trust with the local and international trade unions. Workers' representatives shall not be discriminated against and may perform their representative functions in the workplace. Please see more in our [Supplier Code of Conduct](#) in section 4.2.

#### 4.2 Diversity & Inclusion

Our approach to diversity and inclusion (D&I) reflects two core TDC NET values: “We care” and “We are open”. We want our employees to reflect the diversity within society, and consequently TDC NET is a workplace with equal opportunities for anyone with a suitable skillset and mindset. To ensure a workplace where everyone feels safe and can report inappropriate behaviour, we have strengthened our focus on zero harassment in 2021, via our whistle-blower system, in partnership with an external law firm. We also aim to ensure that leaders communicate and incorporate an inclusive culture in their teams with a focus on psychological safety and managing biases.

TDC NET wants to accommodate a hybrid workplace and enable flexible working to increase people's well-being and raise job satisfaction. This system involves supporting collaborative work across platforms, places, and presence. It entails enabling work when and where it suits people best.



#### **Diversity & Inclusion Targets:**

**Reach gender balance of 30% in leadership by 2025**

#### 4.3 Health & Safety

Protecting our people on the ground is a very high priority when we roll out digital infrastructure. This includes providing a healthy and safe (H&S) working environment for our people working onsite, in the office, or at home. Our H&S ambitions are based on strong collaboration. At Board of Director (BoD) level, we have established an H&S committee and the H&S organisation is structured in line with the Danish Environment Act. TDC NET is H&S certified (ISO 45001) based on an H&S management system that defines, strategy, risks, and procedures.



### Health & Safety Targets:

**Reduce H&S injuries by 50% in 2025 with a 2019 baseline**

**Aim for “Vision Zero” and mindset that all injuries can be prevented**

## 5. Climate & Environment

As a leading provider of digital infrastructure, we must limit our impact on the climate while supporting a green transition for other sectors and industries. As a result, we continuously seek to reduce our operational products and services’ impacts on the environment through a systematic framework of planning, managing, and reviewing of actions. We do this as part of our investment in our ISO 14001 certification. Our commitment to the climate and environment reached an important milestone in 2021 as the Science Based Targets initiative (SBTi) validated our near-term climate targets aligned with 1.5°C. We are also committed to reach overall net-zero emissions in our entire value chain (scopes 1, 2 and 3) by 2030. These targets have been validated by the SBTi.



### Climate Targets:

**100% renewable energy in operations by 2028 (scope 1 & 2)**

**CO<sub>2</sub> net-zero on scopes 1, 2 and 3 by 2030**

## 6. Ethics & Anti-corruption

Respect for business ethics and the rule of law are a precondition for a fair and sound business environment. TDC NET sets out a zero tolerance approach towards any form of bribery, corruption and other types of inappropriate business behaviour as described in our [Supplier Code of Conduct](#). We take a systematic approach to risk management around security, with regular assessments made both by internal and

external parties, ongoing investments, control, and management. Please see more in our [Security, Privacy and Data Ethics Policy](#).

## 6.1 Whistle-blower setup

We want to ensure that our procedures are always transparent and accountable. This should be the case both internally and when we work in collaboration with partners. Therefore, TDC NET has established a [whistle-blower scheme](#) that allows anyone to anonymously report irregular or illegal behaviour in the workplace or collaborative ventures.

## 6.2 Digital Trust

As the world becomes more digital, it is important to safeguard that individuals and society feel comfortable in this area. TDC NET wants to promote the right to privacy and aim to only use data with a strong, transparent purpose. Consequently, we have established a “Digital Trust Forum”, including subject matter experts and leaders from Security, IT and Privacy.



### Digital Trust Targets:

**All employees complete GDPR e-learning course**

**Evaluate data requests in governance forum**

## 7. Monitoring & Reporting on ESG data

At TDC NET, we are committed to transparency and alignment with global best practice. We set ambitious targets for our sustainability ambitions and monitor progress to ensure we continuously improve our performance. Progress on specific key ESG figures is reported annually in the Sustainability Report found on our [website](#), including our contribution to the UN Sustainable Development Goals. To ensure transparency, TDC NET’s reporting is based on current national and international guidelines, and the data presented is subject to external review, according to ISAE 3000. Our Annual Sustainability Report serves as our annual Communication on Progress submitted to the UN Global Compact and our statutory statement on corporate social responsibility in accordance with sections 99a and 99d of the Danish financial Statement Act.



Figure 2: Relevant SDGs for TDC NET

## 8. Sustainability Policy Update, Ownership & Improvement

The Sustainability Policy is maintained and reviewed on an annual basis by TDC NET's Sustainability team and Head of Sustainability based on strategic initiatives and approved by our Board of Directors. Responsibility for the implementation and upholding of the policy lies with the Head of Sustainability and each employee whose work falls within the scope of the policy. Every fourth year the Sustainability Policy is revised for improvements to make it more accurate to the current context. TDC NET strives to ensure that all employees and suppliers understand its context. The policy should be read together with TDC NET's package of corporate policies. We are committed to engage with our stakeholders to continuously improve our sustainability performance in accordance with our stakeholders' expectations. The Sustainability Policy and other relevant policies can be found through our Sustainability website [here](#).

Please consult [sustainability@tdcnet.dk](mailto:sustainability@tdcnet.dk) for questions or feedback on sustainability at TDC NET.

## 9. Policy Owner and approval of TDC NET's BoD

Policy Owner: Ms. Inge Hansen, Senior Vice President, Corporate Affairs, TDC NET

Approved by: TDC NET A/S Board of Directors

Date of revision: November 2022