

### GRI Context Index: 2019 Annual Report

TDC's Annual Report 2019 has been prepared in accordance with the GRI Standard: Core option. The following standards have been identified as material to our ESG related reporting.

GRI Standard	Disclosure Number	Disclosure Title	Reporting Location	Omissions
General Disclosures	102-1	Name of the organization	TDC A/S	
General Disclosures	102-2	Activities, brands, products, and services	TDC Group connects Danes with each other and the world and has done so since 1882. Our business units Nuuday and TDC NET contribute to the digitalisation of Denmark. Nuuday delivers innovative digital customer experiences and entertainment through a number of B2B and B2C brands (8 in total), while TDC NET delivers the best mobile network and fastest fixed connections. Please see page 4 of our Annual Report.	
General Disclosures	102-3	Location of headquarters	TDC A/S, Tegholmegade 1, 0900 København C	
General Disclosures	102-4	Location of operations	Denmark	
General Disclosures	102-5	Ownership and legal form	TDC A/S is a privately held company owned by the three Danish pension funds ATP, PKA, PFA and the infrastructure fund Macquarie Infrastructure and Real Assets. Please see the table on related parties on page 128 of the Annual Report.	

General Disclosures	102-6	Markets served	Please see Our Structure, Nuuday Business Model, TDC NET business model on pages 11-13, 21, 27-30 of the Annual Report.	
General Disclosures	102-7	Scale of the organization	Please see TDC at a Glance on page 4 and the 5-year overview on page 8 of the Annual Report.	
General Disclosures	102-8	Information on employees and other workers	Please see the employee information on page 59 of the Annual Report. Information on how the figures are calculated is in our TDC ESG data accounting principles which are on our website.	These figures are for TDC employees only.
General Disclosures	102-9	Supply chain	Information on our approach to Sustainable Procurement and Supply Chain is available on page 52 of our Annual Report.	
General Disclosures	102-10	Significant changes to the organization and its supply chain	Please see Letter from Management on pages 6-7 of our Annual Report.	
General Disclosures	102-11	Precautionary Principle or approach	Please see our Sustainability Policy on our website.	
General Disclosures	102-12	External initiatives	TDC has been a signatory of the UN Global Compact since 2009 and is a member of the UN Global Business Ambition for 1.5°C Pledge since 2019. Please see Memberships on page 37 of our Annual Report.	
General Disclosures	102-13	Membership of associations	Please see Memberships on page 37 of our Annual Report.	
General Disclosures	102-14	Statement from senior decision-maker	Please see Letter from Management on page 7 of our Annual Report. Please also see page 2 of our Sustainability Highlights on our website.	

General Disclosures	102-15	Key impacts, risks, and opportunities	Please see Materiality and Stakeholder Engagement on page 34 and Risk Assessment on pages 60-62 of our Annual Report.	
General Disclosures	102-16	Values, principles, standards, and norms of behaviour	Please see Our Approach in the How we do business section and Responsible Procurement & Sustainable Supply Chain on page 52 and on page 5 of our Sustainability Policy.	
General Disclosures	102-17	Mechanisms for advice and concerns about ethics	Please see our Whistleblower Policy available in both Danish and English on our website, and page 64 of our Annual Report.	
General Disclosures	102-18	Governance structure	Please see information on Our Board of Directors on pages 65 and 66 of our Annual Report and on our website.	
General Disclosures	102-19	Delegating authority	Please see Management Team on page 67 and Sustainability Governance & Oversight Framework on page 33 of our Annual Report.	
General Disclosures	102-20	Executive-level responsibility for economic, environmental, and social topics	Please see Management Team on page 67 and Sustainability Governance & Oversight Framework on page 33 of our Annual Report.	
General Disclosures	102-21	Consulting stakeholders on economic, environmental, and social topics	Please see Materiality and Stakeholder Engagement on page 34 of our Annual Report.	
General Disclosures	102-22	Composition of the highest governance body and its committees	Please see information on Our Board of Directors and our corporate governance on pages 63-66 of our Annual Report and on our website	
General Disclosures	102-23	Chair of the highest governance body	Please see page 65 of our Annual Report.	

General Disclosures	102-40	List of stakeholder groups	Please see Materiality and Stakeholder Engagement on page 34 of our Annual Report.	
General Disclosures	102-41	Collective bargaining agreements	84% of TDC employees are covered by collective bargaining agreements.	
General Disclosures	102-42	Identifying and selecting stakeholders	Please see Materiality and Stakeholder Engagement on page 34 of our Annual Report.	
General Disclosures	102-43	Approach to stakeholder engagement	Please see Materiality and Stakeholder Engagement on page 34 of our Annual Report.	
General Disclosures	102-44	Key topics and concerns raised	Please see our Strategy and Materiality Matrix on page 34 of our Annual Report.	
General Disclosures	102-45	Entities included in the consolidated financial statements	Please see Accounting Policies page 78 of our Annual Report.	
General Disclosures	102-46	Defining report content and topic Boundaries	Please see Materiality Matrix on page 34 of our Annual Report.	
General Disclosures	102-47	List of material topics	Our material topics were identified as those that are of highest importance to both our stakeholders and the business. Please see Materiality Matrix on page 34 of our Annual Report.	
General Disclosures	102-48	Restatements of information	Please see pages 1 and 2 of TDC ESG Data accounting principles.	
General Disclosures	102-49	Changes in reporting	For changes in reporting, please see pages 1 and 2 of TDC ESG Data accounting principles.	
General Disclosures	102-50	Reporting period	The performance content of this report is published annually. Please see reporting boundary on page 1 of TDC ESG Data accounting principles.	

General Disclosures	102-51	Date of most recent report	The most recent previous CSR performance report was published in the 2018 CSR Report on 21 February 2019. This is available on our corporate website.	
General Disclosures	102-52	Reporting cycle	The performance content of this report is published annually. Please see reporting boundary on page 1 of TDC ESG Data accounting principles.	
General Disclosures	102-53	Contact point for questions regarding the report	Contact details for the report and further information is on our website.	
General Disclosures	102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option; see page 162 of our Annual Report for the statement.	
General Disclosures	102-55	GRI content index	Our GRI content index is available on our corporate website.	
General Disclosures	102-56	External assurance	Our ESG accounting principles are published online at our corporate website. While our data is not assured, our data collection and reporting processes are reviewed for robustness and correctness by PwC prior to publication.	
Economic Performance	201	Management Approach	Please see our Annual Report for information on our management approach to economic performance.	
Economic Performance	201-1	Direct economic value generated and distributed	Please see Financial statements starting on page 70 of our Annual Report. Also, see the Impact Wheel on page 36 of the Annual Report.	

Energy	302	Management Approach	Please see pages 39-41 of the Annual Report and page 3 and 4 of our Sustainability Policy.	
Energy	302-1	Energy consumption within the organization	Please see the environmental data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	
Energy	302-4	Reduction of energy consumption	Please see pages 40 and 41 of the Annual Report.	
Emissions	305	Management Approach	Please see pages 39-41 of the Annual Report and page 3 and 4 of our Sustainability Policy.	
Emissions	305-1	Direct (Scope 1) GHG emissions	Please see the environmental data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	
Emissions	305-2	Energy indirect (Scope 2) GHG emissions	Please see the environmental data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	
Emissions	305-3	GHG emissions intensity	Please see the environmental data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	
Effluents and waste	306	Management Approach	Please see page 39-41 of our Annual Report and pages 3 and 4 of our Sustainability Policy.	
Effluents and waste	306-2	Waste by type and disposal method	Please see the environmental data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	
Occupational health and safety	403	Management Approach	Please see page 53 of our Annual Report.	

Occupational health and safety	403-1	Occupational health and safety management system	Occupational health and safety management system	Please see page 53 of our Annual Report.	
Occupational health and safety	403-2	Promotion of worker health	Promotion of worker health	Please see page 53 of our Annual Report.	
Occupational health and safety	403-3	Work-related injuries	Work-related injuries	Please see the Occupational Health & Safety data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	
Training and education	404	Management Approach	Management Approach	Please see page 13 and How we do business (Talent Agenda) on page 52 of our Annual Report	
Training and education	404-1	Average hours of training per year per employee	Average hours of training per year per employee	Please see the HR data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	This figure is not collected by gender or category.
Training and education	404-3	Percentage of employees receiving regular performance and career development reviews	Percentage of employees receiving regular performance and career development reviews	Please see the HR data table on page 59 of our Annual Report and the TDC ESG data accounting principles on our website.	
Diversity and equal opportunity	405	Management Approach	Management Approach	Please see Diversity and Inclusion on pages 56 and 57 of our Annual Report.	
Diversity and equal opportunity	405-1	Diversity of governance bodies and employees	Diversity of governance bodies and employees	Please see Gender Diversity in Management on page 57, the HR data table on page 59 of our Annual Report, and the TDC ESG data accounting principles on our website.	
Customer Privacy	418	Management Approach	Management Approach	Please see pages 52 and 54 of our Annual Report.	
Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Please see page 54 of our Annual Report.	

Other Material Issues	Reporting Location
Digital Skills	Please see pages 46, 47, and 49 of our Annual Report.
Business Purpose	Please see page 6 of our Annual Report.
Innovation, Investment	Please see page 46 of our Annual Report.
Cybersecurity	Please see page 55 of our Annual Report.
Good business behaviour	Please see page 52 of our Annual Report.
Customer Experience (CX)	Please see pages 12, 20, and 62 of our Annual Report.

Document	Link
2019 Annual Report	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/upload10march/tdc-group-annual-report-2019-optimized.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/upload10march/tdc-group-annual-report-2019-optimized.ashx</a>
2019 Sustainability Highlights	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-highlights/tdcesg2019dk-090320201815.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-highlights/tdcesg2019dk-090320201815.ashx</a>
TDC ESG data accounting principles (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-esg-accounting-principles-march-2020.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-esg-accounting-principles-march-2020.ashx</a>
TDC ESG data accounting principles (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-esgregnskabsprincipper-marts-2020.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-esgregnskabsprincipper-marts-2020.ashx</a>
Sustainability Policy (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc_sustainability-policy-2019-uk.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc_sustainability-policy-2019-uk.ashx</a>
Sustainability Policy (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-policy-2019-da.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-policy-2019-da.ashx</a>
Whistleblower Policy (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/whistleblowing-at-tdc.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/whistleblowing-at-tdc.ashx</a>
Whistleblower Policy (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/whistleblowing-i-tdc-januar-2020.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/whistleblowing-i-tdc-januar-2020.ashx</a>
2018 CSR Report (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/csr-report/tdc_csr-report_uk20181.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/csr-report/tdc_csr-report_uk20181.ashx</a>
2018 CSR Report (DK)	<a href="https://tdcgroup.com/da/ansvarighed#cf5dc1d8-6aa2-45b6-9a6b-a57d4779f1e7">https://tdcgroup.com/da/ansvarighed#cf5dc1d8-6aa2-45b6-9a6b-a57d4779f1e7</a>
Partner Code of Conduct (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-uk---september-2018.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-uk---september-2018.ashx</a>
Partner Code of Conduct (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-dk---september-2018.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-dk---september-2018.ashx</a>



Data Ethics Policy (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-data-ethics-policy-2019.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-data-ethics-policy-2019.ashx</a>
Data Ethics Policy (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-dk---september-2018.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-dk---september-2018.ashx</a>