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#### About this report

This document concerns the environmental, social and governance performance of TDC A/S. It is an extract of our TDC A/S Annual Report 2020, which is an integrated report of the company's financial and sustainability performance, prepared in accordance with GRI Reporting Standards: Core option, externally assured by a independent third-party assessor, and is in compliance with section 99a and b of the Danish Financial Statements Act. This report, our integrated Annual Report, the accompanying GRI Index and our ESG Data Accounting Principles are all available on our website: https://tdcgroup.com/en/.

## Comment from our CEO

2020 has been a challenging year, but it has also been a year that demonstrated exactly why the products and services we deliver are valuable for society. From busy home offices and online school classes to video calls with friends and family. Our connectivity solutions have allowed us to stay in touch and continue our everyday lives somewhat normal, in spite of the pandemic.

TDC

As we create two independent companies, TDC NET and Nuuday, we are also focusing on embedding our ESG activities even closer into our businesses. Committed to serving Danish society, our sustainability activities must contribute to the society that we are a part of by ensuring sustainable consumption, as well as reducing negative climate impact and bringing together our employees to support good causes such as BørneTelefonen and not least, reducing costs and increasing our organisational resilience.

However, our business operations do not come without environmental costs and we are committed to take upon us the responsibility to reduce our negative impact. That's why we in 2020 brought forward our climate action target by two years and will now be  $CO_2$  neutral in 2028 (scope 1 & 2). We also continued to reduce our energy consumption through legacy decommission projects and we took the first steps towards transitioning to renewable energy. In 2021, we will present our scope 3  $CO_2$  reduction targets and get our scope 1, 2 and 3 targets approved by the Science Based Targets initiative.

We have since 2009 been a signatory to the UN Global Compact and our commitment to acting responsibly in line with these principles is one we take seriously. In our efforts to ensure responsible business development, we have in the past year taken important steps in not only maturing the health and safety culture in our own business but also deepening the dialogue with and collecting health and safety data from our subcontractors. These elements are also a part of our new health and safety strategy which was approved in 2020 as well as us obtaining the ISO 45001 certification.

We are determined to promote sustainability and contribute positively to the development of the society that fostered us and when we in 2020 invested DKK 5.5 billion in creating world-class digital infrastructure such 5G and fibre, we not only see it as an investment in TDC, we see it an investment in a sustainable digital Denmark. In this report, you can read more about our initiatives and how we deliver on our sustainability strategy.

Henrik Clausen Group CEO & President



**Environmental** 

**Impact** 

## ESG framework at TDC Group

TDC has been connecting Denmark with the world since 1882 and clearly, our infrastructure and services have supported the growth and development of Denmark into a digital society. As the country's foremost connectivity and digital services provider, it is important that we fulfil our obligation to be good corporate citizens and operate in a responsible manner, growing our business in line with our sustainability ambitions and ethical values. This translates into decision-making in our business that reinforces sustainable and responsible development.

#### Our sustainability strategy

Digital

Denmark

Our sustainability strategy, which is based on our material issues, guides our environmental, social and governance activities.

Despite the broad range of issues covered; we have defined a three-pillared strategy that balances stakeholder concerns, ESG risks, core competencies, public commitments and business ambitions. It is also aligned to the UN Sustainable Development Goals, and underpinned by our Sustainability Policy, which we publish on our website.

To ensure that we deliver on our ambitions, our strategy is tied to various KPIs that monitor and measure our performance and are used for internal reporting to Management and the Board of Directors.

Our strategy is now well into the rollout and execution phase, and some of our targets published in 2019 have already been raised to match our

increased appetite for taking responsibility for ESG issues, especially regarding climate action.

This demonstrates our ambition to make a positive impact and actively operate and develop TDC in a way that promotes sustainability and contributes to society's green transition.

#### Governance

Our sustainability strategy is embedded in our business strategy and is approved by our Board of Directors. On an operational level, our Executive Management team is responsible for ensuring our targets are met, and the strategy and activities have been cascaded down throughout the entire organisation.

To manage our climate commitments, we have established a CO<sub>2</sub> Forum, led by a member of in which key management-level personnel from both TDC NET and Nuuday participate. The CO<sub>2</sub> Forum is responsible for the roadmap to CO<sub>2</sub> neutrality<sup>1</sup> that they have developed with input from suppliers and employees, taking direction from our sustainability team and project management offices. The Director of Sustainability ity strategy in operations and achieving our

'Sustainability Ambassadors' who are located in teams and brands across TDC Group, TDC NET and Nuuday.

In addition, our governance is supplemented by project- or topic-specific checks and balances, which are externally audited. For example, our environmental activities are tied to our ISO 14001 certified environmental management system, and our Occupational Health and Safety (OH&S) approach is tied to our ISO 45001 certified OH&S



the Executive Management Team of TDC Group, is responsible for implementing the sustainabil-

We support digital We will be 100% CO2 We take responsibility neutral in 2028 for our employees, our citizenship, develop KPIs. In this task, she is assisted by the Sustaindigital solutions and customers, and our We minimise our ability Team and a large network of employee value chain ensure digital environmental impact connections for all of Denmark

How we do

business

1 Our definition of CO2 neutrality refers to achieving net zero greenhouse gas emissions for our Scope 1 and 2 emissions by reducing to zero those generated through energy used in our operations or from the generation of electricity and heat that we purchase. We will achieve this by sourcing zero emission fuels and offsetting. Measured in tons of CO2e, our 2023 target to achieve a 50% reduction in CO2e emissions has a 2020 baseline.

system. We also have an extensive range of issue-specific policies covering critical ESG risk areas such as: data protection, privacy and data ethics, anti-corruption, IT security, and our Code of Conduct. These have established lines of responsibility, culminating with the Board of Directors or the Audit Committee of the Board of Directors, that support strong governance within ESG areas at TDC. Finally, our ESG reporting is prepared in accordance with GRI Reporting Standards: Core Option and is assured by an external third-party assessor.

## A materiality-led approach to sustainability

At TDC, we define and understand our material issues according to best practice sustainability reporting standards (GRI). The integration of stakeholder insights and feedback is a central tenet of our approach.

Our most recent materiality assessment, conducted in 2019, followed a 5-step approach. First, we identified and engaged with all our stakeholders and key internal experts, before performing a desk study of issues and trends that allowed us to assess and prioritise the challenges and opportunities both for and from our business. Quantitative and qualitative engagement with stakeholders included surveys and interviews, and finally this input was integrated to create a hierarchy of impacts on and from our operations and products.

Stakeholders' voices included in this exercise were: our Management and Board of Directors, our customers, employees, owners and investors, the authorities and regulatory bodies, media, suppliers, business partners, NGO partners, and interest groups.

Our materiality matrix was the outcome of this assessment, and the material issues identified by this assessment informed our strategy development and are all captured in our three strategic pillars. By developing our strategy in this way, we aim to build resilience and future-proof our business by bringing all concerns and voices into the conversation.

As a result, we aim for our ESG activities and targets to be inclusive, proactive, and materiality led. By uncovering our potentially most challenging areas and addressing them in a systematic and considered manner, we can focus our attention and resources on what is most important to our stakeholders. And focus our efforts where we are certain we can make the greatest impact, while maintaining strategic relevance for the business.

By conducting this in-depth exercise every 2-3 years and maintaining close contact with key stakeholders on an ongoing basis, we can remain aware of our ESG-related risks and opportunities, while being better prepared to respond to, address or capitalise on unexpected events.

#### Our materiality matrix

Our materiality matrix (right) visualises our top material issues and, in turn, our ESG reporting boundaries.





## **UN Sustainable Development Goals**

The 17 goals of the UN sustainable development agenda for 2030 seek to ensure "universally beneficial outcomes" for all, including future generations. It is a plan of action to achieve a peaceful, equitable and sustainable life for all people on a healthy planet.

We support this agenda, and our approaches and targets are aligned with the UN SDGs to ensure that our efforts support the global effort for sustainable development. We do this because we believe we can use the 2030 goals as a blueprint to increase the positive impact of our business.

By bringing the 2030 sustainable development agenda into the heart of our business, we have identified three SDGs that, we believe, enable us to contribute to in a meaningful way.

In 2020, TDC worked actively to advance progress in these three areas: Quality Education (SDG #4), Industry, Innovation and Infrastructure (SDG #9) and Climate Action (SDG #13).

# WE LEADER CHAPTER LEA

#### SDG actions taken by our business in 2020



### Target

 25% of Danish school children to benefit from TDC digital citizenship materials by 2025

#### 2020 Actions

- By the end of 2020, 99,205 Danish school children had been reached with digital citizenship materials; 52% of the way towards achieving our 2025 target
- Digital citizenship materials launched in Greenland



#### Target

- One million homes to be connected to fibre; nationwide 5G coverage
  2020 Actions
- In 2020, TDC passed 123,000 homes in Denmark with fibre broadband, meaning we are now 39% of the way to achieving our goal
- National 5G coverage was achieved by December 2020



#### Target

 100% CO<sub>2</sub>e neutral<sup>1</sup> in 2028 (Scopes 1 and 2 emissions)<sup>2</sup>; set Science-Based Targets (SBTi)<sup>3</sup>

#### 2020 Actions

- Agreed roadmap to CO<sub>2</sub>e neutrality (zero emissions from operations)
- Target deadlines brought forward 2 years; 50% reduction in CO<sub>2</sub>e emissions by 2023 vs. a 2020 baseline, 100% reduction by 2028
- Completed first Scope 3 emissions inventory; a critical step towards setting our SBTi target
- <sup>1</sup> Our definition of CO<sub>2</sub> neutrality refers to achieving net zero carbon dioxide emissions for our Scope 1 and 2 emissions by reducing to zero the CO<sub>2</sub>e emissions generated through our use of energy in our operations or from the generation of electricity that we purchase. We will achieve this through sourcing zero emission fuels or offsetting. Our 2023 target to achieve a 50% reduction in our CO<sub>2</sub>e emissions has a 2020 baseline.
- 2 We report our emissions in line with the World Business Council for Sustainable Development GHG Protocol methodology, which classes emissions in three groups: Scopes 1, 2 and 3. Our Scope 1 emissions consist of the fuel in our vehicles, the oil in our backup generators and other energy sources we use in our operations. Scope 2 emissions are those from purchased electricity. Scope 3 comprises value chain emissions.
- 3 Science-Based Targets are clearly defined greenhouse gas emission reduction targets in line with the latest climate science aimed at meeting the goals of the Paris Climate Agreement and limiting global warming to 1.5°C.

## Engaging with our stakeholders

#### **Memberships**

As a part of engaging with ESG topics, TDC is a proud member of specially selected international and national organisations and commitments that promote sustainable development.

We collaborate with the Telecoms Industry Association (TI), the Danish Chamber of Commerce (Dansk Erhverv), DA (Dansk Arbeidsgiverforening), the Danish IT Industry Association (ITB), Danske Mediedistributører (FDIH), and the UN Gender Diversity Roundtable.

In Europe, we collaborate with the European Telecommunications Network Operators' Association (ETNO), and GIGA Europe.

At international level, we are board members of the Global e-Sustainability Initiative (GeSI) and we also participate in the association of mobile network operators worldwide GSMA, as well as the Joint Audit Committee (JAC), an association of telecom operators working to further ESG implementation in the global ICT supply chain.

TDC has been a signatory of the UN Global Compact since 2009; providing annual Communications on Progress towards the 10 principles of the compact. In 2019, we also signed the UN Business Ambition for 1.5°C Pledge and are working towards fulfilling our commitments under this pledge.

#### Certifications and external recognition

We publish information related to our ESG activities in order to increase transparency and facilitate benchmarking by our owners, investors, suppliers and other interested parties.

We strive to align our operations with international standards when applicable. Currently, we have three ISO certifications across our business, covering environmental management, occupational health and safety, and IT security.

• In 2020, we were pleased to retain our ISO 14001 certification in Environmental Management. This ISO standard is an internationally recognised framework that helps organisations to improve their environmental performance through more efficient use of natural resources. The certification encompasses all TDC brands and is amongst the largest in Denmark, covering all our employees and locations.

- In spring 2020, we upgraded our OHSAS 18001 certification to meet the ISO 45001 standard. This certification covers TDC's largest locations where employees are permanently located.
- Our business-to-business brand NetDesign has been ISO 27001 certified in terms its IT security for several years.

Our activities and performance are rated by both GRESB and EcoVadis, and we seek to demonstrate year-on-year improvement.

- In 2020, we received a GRESB Infrastructure rating of 65, up 4 points from 2019.
- Our EcoVadis rating for the 2020 assessment was 65, up 3 points from 2019, which put us in the top 10% of respondents.

Our ESG reporting is prepared in accordance with GRI Reporting Standards: Core Option and is assured by an external third-party assessor.























## **Environment and climate**

#### Our approach

The ICT industry is a key enabler of sustainable economic growth. By connecting individuals and communities across the globe, we facilitate the flows of knowledge and commerce that underpin our economies and livelihoods. The adoption of 5G, where lightning-fast and stable mobile internet connections will allow for the remote operation of all kinds of machines and processes in real time, will reveal even more potential. Connectivity and digital technology promise to facilitate the delivery of sustainable development for all according to the Digital with Purpose report from the ICT industry body GeSI. This report found that digital technologies can potentially deliver carbon emissions reductions equivalent of seven times the growth in the entire ICT sector's emissions footprint over the period to 2030.

However, this connectivity is not without an environmental cost. Telecom networks require electricity to operate, our equipment requires large-scale manufacturing and rare earth minerals, and our employees must transport themselves around Denmark to service customers. This impact is our responsibility and consequently, we actively engage with this agenda.

We take an inward-out approach to managing our impacts. First, we look at our operations and how we can reduce impacts across all environmental KPIs, including initiatives on energy consumption and intensity, carbon emissions, resource use, waste, and electronic waste (WEEE). Next, we consider how to reduce the impact of our products and

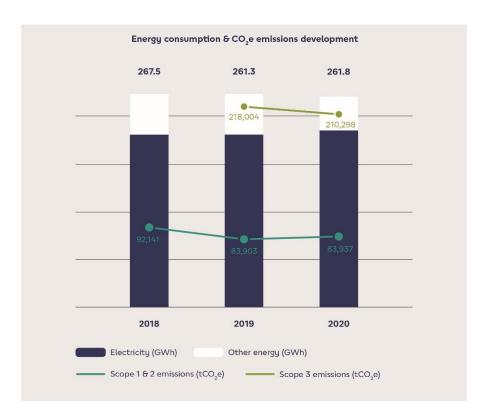
services and our employee activities on behalf of TDC, e.g. through remote collaboration. Finally, we seek to increase the knowledge of sustainable behaviours and research through involvement with international organisations and advocacy at national, regional and international fora.

We maintain a systematic framework of impact assessment, gap analyses, initiative planning, and active management, all guided by our materiality matrix and based on the ISO 14001 Environmental Management System framework. Our entire operation, spanning over 10,000 network sites and almost 7,500 employees, has been ISO 14001 certified since 2019.

We believe that taking this approach helps us to build a resilient, lean business that can create value for the environment, value for society, and value for our owners simultaneously.

#### Climate ambitions

Due to our position as one of the largest private companies in Denmark, with 100% of our operations in our domestic market and a significant consumption of electricity, we have a unique opportunity to play a role in supporting Denmark in achieving its national climate targets. To do this, we have set an ambitious climate target: to be  $100\% \, \text{CO}_2$  neutral by 2028 for our direct emissions (scopes  $1 \, \& \, 2)^1$  and to reduce our  $\text{CO}_2$  emissions by 50% by 2023, measured against a 2020 baseline. These commitments drive all our activities to reduce our climate footprint.



We have also committed to set a Science-Based Target<sup>2</sup> in line with the protocols of the Science-Based Targets Initiative (SBTi) for our emissions, including

Scope 3<sup>3</sup>, by September 2021. That will address reducing emissions in our operations and across our whole value chain.

- We report our emissions in line with the World Business Council for Sustainable Development GHG Protocol methodology, which classes emissions in three groups: Scopes 1, 2 and 3. Our Scope 1 emissions consist of the fuel in our vehicles, the oil in our backup generators and other energy sources we use in our operations. Our Scope 2 emissions refer to the emissions from the electricity we purchase to power our operations and the heat from district heating. We measure our emissions in tons of CO2e.
- <sup>2</sup> Science-Based Targets are greenhouse gas emission reduction targets that are clearly defined and in line with the latest climate science in order to meet the goals of the Paris Climate Agreement and its aim to limit global warming to 1.5°C. For more information, read here.
- <sup>3</sup> Our Scope 3 emissions refer to the emissions generated in our upstream and downstream value chain that result from our operations.

# Environmental activities: 2020 and beyond

During 2020, three major programmes were put in place to achieve our climate ambitions.

#### 1. Governance and activities

TOC

Firstly, we established the internal governance structures needed to drive success regarding our Scope 1, 2 and 3 emissions. Our CO<sub>2</sub> Forum has developed a roadmap of initiatives that will deliver on our targets, using input from employees gathered through workshops and working groups, and with direction from our Sustainability Team. One of their first actions was to bring forward our scope 1 & 2 targets by two years.

The other key initiatives in 2020 included opening a tender for a renewable energy PPA (power purchase agreement) for our electricity consumption. This agreement will cover almost 100% of our Scope 2 emissions once implemented. We expect the agreement to be finalised in 2021 in time for execution in 2022.

We have chosen to pursue this strategy instead of buying certificates from existing renewable energy capacity, as we wish to take co-responsibility for supporting the green transition in Danish society. Our actions will fuel the development of new renewable energy resources to cover our electricity consumption without compromising other's access through competition for existing resources.

Four additional CAPEX investments were secured for rollout in 2021. Together, they are expected to reduce CO<sub>2</sub>e emissions from the network by 191 tons in 2021. The projects cover upgrades to our cooling and power systems at various important technical sites

In 2020, we have continued several projects from previous years that have helped to reduce our energy consumption; including legacy decommissioning. One example is the shutdown of an older version of our XDD broadband platform, which will result in a 1.5 GWh annual energy saving in the network. Although rolling out 5G and fibre across Denmark counteracted this saving, these new networks raised our energy consumption, as expected. As a result, energy consumption remained flat in 2020 compared with 2019.

E: Environment

#### 2. Scope 3 inventory

In 2020, we completed our first-ever complete inventory of our Scope 3 emissions. This work uncovered in detail our indirect upstream and downstream emissions and demonstrated the true climate impact of our operations. We can clearly see that the scale of our Scope 3 emissions are two and a half times greater than our direct operations. The biggest emitters are purchased goods and services, capital goods, and use of goods sold.

This inventory provides us with the critical baseline for setting our SBTi Scope 3 target and highlights the levers available to influence them. It will also inform our supplier engagement programme, which we will ramp up in 2021, supported by an increased organisational focus and resourcing. We have identified suppliers with the largest emissions and estimated the emissions of suppliers who are not fully transparent. We will therefore work within a supplier relationship management framework to identify the potential for reducing emissions, while also conveying the importance of emission data quality and disclosure to suppliers.

An example of how this insight can help us reduce our climate impact is employee commuting. We now have a baseline that can be used to see how different internal policy options can affect our total carbon footprint. For example, in June, we launched "Pioneering Digital Collaboration", an initiative that gives employees more freedom to work anywhere, anytime. We anticipate that employees will work more from home, even after the COVID-19 lockdowns are lifted. According to our modelling, that could a decrease of over 1,400 tons of CO<sub>2</sub>e.

#### 3. Resource management & circularity

2020 was another very successful, if atypical, year, as we reduced the total waste volume produced from our operations by 13% compared with 2019. This sizable drop can be attributed to most employees working remotely for long periods of time. Nonetheless, we managed to maintain a high recycling rate of 61%.

From a network perspective, our 5G rollout has required upgrading 3,800 existing radio sites. Consequently, around 700 tons of existing installation material has been used for spare parts, recycled, or scrapped (e.g. approx. 40 tons of iron, 200 tons of batteries, and 400 tons of cables) this year. We have also identified approximately 85,000 devices that are now available to be sold for reuse by operators in other countries, harvested for spare parts, or recycled.

From a customer equipment perspective, we continued to work on reducing the lifecycle impact of our Customer Premise Equipment (CPE) by promoting circular processes through refurbishment and reuse. Between them, TDC Erhverv and YouSee refurbished almost 157,000 units, up 51% compared with 2019. By doing so, they avoided 77 tons of ewaste. This work not only reduces our environmental impact by shortening supply chains and avoiding transport emissions, it also reduces the need to mine for and manufacture new devices.

#### Moving forward

The journey towards a 50% reduction of our Scope 1 and 2 CO<sub>2</sub>e emissions by 2023<sup>1</sup> is well underway. We are paying specific attention to the increased energy consumption that will result from the 5G and fibre rollouts, and mitigation efforts are included in our planning.

For 2021, and as a part of our commitment to the UN Business Ambition for 1.5°C pledge, we will set our Scope 3 emission reduction target and submit our targets for scopes 1, 2 & 3 to the SBTi for approval. We will also work to detail our Scope 3 lever catalogue and utilise supplier engagement to further this process.

Of the direct actions to reduce energy consumption in 2021, some were already approved for implementation in 2020. This includes entering a PPA for all our Scope 2 electricity consumption, the four capital investments at our technical sites detailed above, and employee engagement with a focus on commuting and waste. Rolling these out will be key operational activities in 2021.

In order to increase transparency and continue to improve our reporting, we will report to CDP and in line with TCFD reporting requirements. We will also have our energy and emissions data assured by an external third party for the first time.

<sup>&</sup>lt;sup>1</sup> Compared with a 2020 baseline.

# **Digital Denmark**

As the leading telecommunications provider in Denmark, we are committed to realising 'Digital Denmark' through countrywide connectivity and by promoting digital citizenship for all.

#### Our approach

We work as one company and in partnership with dedicated and knowledgeable representatives of civil society to promote digital citizenship and ensure that everyone can benefit from the new, rapidly evolving opportunities digitalisation brings. TDC has always played a special role in facilitating communication and ensuring connections between people.

TDC wants to enable Denmark to move forward as a digital nation while taking co-responsibility for the society that fostered us by ensuring and protecting equal digital opportunities even though the technological landscape is rapidly changing.

Our investments in 5G, fibre, and our network are investments in the digital future of Denmark. In 2020, our investments amounted to DKK 5,547m.

#### Digital citizenship and skills

As the country's leading supplier of digital connections, we take co-responsibility for ensuring that individuals and members of society have the skills required for a digital age. This relates to technical, creative and social skills that are crucial for developing as individuals and treating others with respect in a digital universe.

We insist that digitalisation is for everyone and we recognise that some need a little more help to discover the benefits of digital solutions.

TDC is also a founding member of the "Digital Dogme" initiative for upgrading employees' digital skills and sharing knowledge among companies across industries and sectors. In 2020, TDC led a Digital Dogme working group that discusses different knowledge levels within cyber security and works to increase the focus on this topic.

#### Supporting 'Parents in a Digital World'

Faster than ever, technological devices, digital games and social media are creating new opportunities and disrupting the way we live our lives and interact with each other. And even though we have been engaging with social digital tools for several decades, we still have much to learn about how to handle all the new opportunities offered by digitalisation.

Particularly, when it comes to our children. Many parents find themselves on uncertain ground when setting guidelines for their children's use of digital and social media. With our partner for more than 30 years, Børns Vilkår, we have run several campaigns, including the most recent campaign on so-called 'Sharenting', when parents share images of their children on social media without consent. We did this to start a debate and raise awareness. The campaign exceeded our expectations by reaching more than 200,000 people.

#### Preserving history

'ENIGMA', the national Post, Tele and Communication Museum, is an important source of knowledge on the communications technologies that have shaped our society in the past. In many ways, the story of TDC echoes the story of Denmark's digital development. Consequently, since 1996, we have supported the daily operations of the museum

In 2020, we announced that, TDC Group will play an important part in the planned historic re-opening of the museum, which features exhibits related to digitalisation.



Photo credit: Daniel Urhøi

## How we do business

#### Our approach

As one of the largest employers in Denmark, owning and operating critical national infrastructure, we are aware of our duty to Danish society to operate in a conscientious and transparent manner. It is critical that our partners, employees and customers trust us and feel secure when using our products and services.

We are committed to taking a proactive approach. We comply with the relevant laws and regulations; however, we aspire to higher standards and seek to continuously improve our policies and practices through external benchmarking assessments, certifications, and other external validation sources. For example, in 2020 we adopted a wide-ranging Data Ethics Policy, which is available on our website. This policy goes beyond the legal requirements, and through its eight points, seeks to set a standard for data handling that customers can rely on.

In addition, and to demonstrate our commitment to transparency, we have also published our Tax Principles on our website. As a leader in our industry, we are proud to contribute to the Danish economy, both directly and indirectly.

To ensure that we address stakeholder concerns. we also actively engage with all our stakeholders to identify material issues and strategic priorities, and we are committed to the highest standards of ethical behaviour

#### **UN Global Compact**

TDC Group has been a signatory to the UN Global Compact since 2009. Ever since, the ten principles of the Global Compact have underpinned our commitment to human rights, labour conditions, respect for the environment, health and safety, data protection and security, and ethical business practices. We publish an annual progress report.

Supporting the principles of the Global Compact, we have devised a suite of policies and procedures that our employees are required to either be aware of or attend training in. These are all available on our website in both Danish and English and include our Whistleblower Policy, our Anti-corruption and Gift Policy and our Data Privacy Policy. Our Partner Code of Conduct is also displayed on our website and addresses the compact principles specifically from the perspective of suppliers and business partners, our Sustainability Policy, GRI reporting index, and ESG accounting principles.



## **WE SUPPORT**

## Sustainable procurement

TDC's business activities affect many stakeholders, including employees, customers, suppliers, subcontractors, partners, and owners and

investors. All our stakeholders should be confident that the ways we do business comply not only with legal requirements, but also with the highest professional and ethical standards.

The main risks we focus on in our supply chain are the environmental impact of the products we buy, human and labour rights, particularly in our network rollout activities, and health and safety along the whole value chain

Our first tool for mitigating these risks is our membership of the UN Global Compact, which we have been a signatory since 2009. We take our commitment to the ten principles seriously and through our Partner Code of Conduct, we translate these principles and their underlying conventions into policies for our employees, partners, and suppliers.

In 2020, several activities brought our Partner Code of Conduct into clearer focus, as we worked to reduce risks in our operations and value chain. Firstly, to mirror the increased activity in our network rollout, we systematically addressed the safety performance of our key civil works suppliers by establishing safety reporting systems. From an organisational point of view, we also upgraded our OH&S certification from OHSAS 18001 to ISO 45001 one year ahead of schedule.

In terms of environmental impact, a number of activities started, or existing activities continued in 2020. One major advance this year was the establishment of our scope 3 inventory, which puts

us on track to set a Science-Based Target for these emissions in 2021. This work is laying the foundation for uncovering our most impactful scope 3 categories and the levers available to influence them. It will also inform our supplier engagement programme, which we will roll out in 2021.

Work on reducing the lifecycle impact of our Customer Premise Equipment (CPE) continues by promoting circular processes through refurbishment and reuse. The process is initiated when a customer returns a TV box or modem, which is then redeployed or refurbishing for reuse by other customers. In 2020, TDC Erhverv and YouSee refurbished almost 157,000 units, thereby avoiding 77 tons of e-waste. By shortening supply chains and removing the need to manufacture new devices, reuse reduces the environmental impact of our products.

In 2021, we will increase our focus in this area by implementing a sustainable procurement programme based on a strategic approach to addressing our material risk issues in a systematic and holistic manner. This will replace our Vendor Sustainability Forum. We expect to achieve this in partnership with our telecommunications peers, industry initiatives and through the use of EcoVadis as a screening and engagement tool for our suppliers. We also intend to build on all the work completed in 2020 with the scope 3 inventory, as the various initiatives are already in place, by setting KPIs and targets as well as establishing internal sustainable procurement reporting.

## Health and safety

#### Our approach

Ensuring good labour practices that promote wellbeing and physical safety has high priority and is key to securing that all TDC employees can fulfil their potential regardless of their fields of expertise.

#### Structure and governance

The Health & Safety organisation is structured in line with the Danish Working Environment Act and TDC is H&S certified (ISO 45001) based on an H&S management system that defines strategy, risks and procedures.

Our health and safety collaboration is handled by the Joint Health and Safety Committee. This Committee consists of four employee representatives from the Health & Safety organisation and three representatives from the trade unions in addition to a representative from TDC Group management and the Head of Health & Safety.

Furthermore, across all brands and companies under TDC Group, health and safety is anchored in 93 Health & Safety groups. Specifically, for TDC Group there are seven health and safety groups.

#### Health & Safety risks

In line with the overall risks reported via the enterprise risk management board, the main health & safety risk in 2020 for employees across TDC Group, Nuuday and TDC NET was COVID-19. Specifically, for technicians in TDC NET work in relation to the fibre rollout, other projects, and maintenance tasks (tripping/falling, traffic).

In line with the Danish Government, TDC has designed a risk level model to guide mitigation actions. The highest risk level pertains to the widespread infection rate in society, and when recommended, TDC sends staff home to work, closes canteens and organises all meetings online. For technicians, the model also regulates how close staff come to clients, e.g. when we're at risk level 5, no employee is to enter a client's home. The risk of working in the Fiber Factory project is mitigated by both an active Health & Safety organisation in TDC NET Onsite and a Health & Safety Concept in the Fiber Factory itself.

#### 2020 Performance and data

Fatalities	0
With lost time	45
Without lost time	65
Total	110
Days of absence	467
Injury incidence (lost time injuries per 10,000 employees)	60
Rate of fatalities (per 1,000,000 hours)	0
Rate of high consequence work related injuries (per 1,000,000 hours)	3.7
Rate of work-related injuries (per 1,000,000 hours)	8.9
Rate of near-miss accidents (per 1,000,000 hours)	7.8

The Health & Safety strategy was approved by TDC's Board of Directors in 2020. With a focus on developing a preventive H&S culture, it is designed to mitigate and reduce the negative effects of the physical and psychological work environ-

We have converted our OHSAS 18001 certification into ISO 45001 certification - the world's international standard for occupational health and safety designed to protect employees from workrelated accidents and diseases.

We have also implemented a health & safety data collection with our top 30 subcontractors with a specific focus on fibre rollout and 5G.

Furthermore, we have conducted basic health and safety training for all staff as well as e-learning. This gives employees insight into safe labour practices and provides the health and safety team with insights into and knowledge of employees' awareness levels.

Finally, we have developed a TDC Bradley model to conduct a baseline Bradley survey to measure the maturity of our health and safety culture. We can then learn from the results and launch new relevant initiatives and activities based on the findings.

#### The Bradley score for TDC Group is 76/100.

The score reflects that the Health & Safety culture is mature and based on a high level of awareness and personal responsibility among the employees and managers. To further strengthen the Health & Safety culture, managers and teams develop and

implement individual action plans throughout the organization.

#### **Targets**

The 2020–2025 Health & Safety strategy, which covers TDC Group, TDC NET and Nuuday, has as an overall target to reduce the negative health and safety consequences by 50% in 2025 regarding injuries, wellbeing and attrition.

#### 2021 outlook

The major project activities will focus on:

- Continuing to develop our culture
- Continuing dialogue with subcontractors, including collecting health and safety data from a revised list of our top 30 subcontractors, and TDC Management site visits
- Improving overall employee wellbeing
- Continuing focus on the COVID-19 situation
- Reporting and reducing near-miss accidents



# Digital trust: GDPR and data ethics

#### GDPR: We keep your data close at heart

We take responsibility for protecting customers' and employees' personal data very seriously.

We aim to meet all GDPR requirements and provisions. Through both organisational and technical measures, we ensure that we process personal data safely, securely, and in compliance with all relevant legislation.

While the responsibility to achieve and maintain GDPR compliance stretches across the entirety of TDC, an appointed Group Data Protection Officer (DPO) drives this specific agenda from a central point of view, supported by the DPO Office. Data Privacy Managers (DPMs) in each business line are responsible for day-to-day processes and GDPR compliance.

The DPO liaises with the supervisory authorities and reports both to the Board of Directors via the Audit Committee, and to the Executive Management Team.

All employees must complete e-learning training in GDPR and personal data compliance and pass a test every 18 months; this is also a mandatory component of the onboarding process for all new employees.

For employees who handle personal data every day, supplementary educational and awareness initiatives are implemented.

#### 2020 GDPR performance

Within the last year, 95% of all employees across TDC Group, Nuuday and TDC NET have completed our comprehensive GDPR e-learning course.

In addition, the DPO Office has conducted awareness campaigns focusing on how to work safely from home and on rules of conduct when processing personal data.

We continue to assess processes to maintain our focus on decreasing the number of personal data breaches. Despite our focused efforts and high level of awareness, however, we do unfortunately experience data breaches.

This can happen due to cyber-criminal attacks or errors. However, we continuously strengthen our systems and processes, and prioritise focusing clearly on GDPR.

#### Our approach to data ethics

In 2019, TDC's first-ever Data Ethics Policy outlining our data ethics principles was approved by our Board of Directors. The policy is available on our website

In 2020, we conducted a series of interviews with managers and employees in parts of the organisation that work specifically with this field and handle personal data and tasks involving aspects of data ethics

It is our assessment that, across the organisation, personal data is handled responsibly and in accordance with our Data Ethics Policy. Similarly, the series of internal interviews have led us to conclude that a high degree of awareness of GDPR compliance is also conducive to maintaining a good data ethics culture in the organisation.

Even though the use of artificial intelligence (AI) is regulated by GDPR. Al is also an area where we must pay attention to data ethics, due to the pace of technological development and the large volumes of data that we hold as a company. Our conclusion is that awareness of ethical data-related behaviour is strong among management and employees in the departments working with AI to ensure that Al improves services for our customers. as stated in our policy.

#### 2021 data ethics outlook

We will set up initiatives to raise awareness of data ethics, especially for employees working extensively with data, to ensure compliance with our principles and to support our data-ethical culture.

We will also focus on designing processes and structures that ensure our Data Ethics Policy is firmly anchored. Particularly when it comes to ensuring that all new business initiatives with significant implications for privacy and handling of personal data must be approved by the corporate management team but also processes that support a positive error culture, where openness about errors and problems leads to improvement.



# Security

#### Our approach

Security remains a top priority, and we base our work on four principles:

- 1. Protect our company
- Protect our customers
- Protect our employees
- Protect citizens.

We take overall responsibility for IT security, information security and physical security by applying a wide-ranging Group Security Policy based on best practices and compliance with the ISO27001 standard for handling IT security.

#### 2020 performance

At TDC Group, we are continuously conducting awareness activities to raise the level of knowledge concerning the present threat landscape and educate employees and customers on how to react to cybercrime attacks.

We want security to be part of our employees' everyday mindset. In 2020, we launched a new security awareness campaign and mindset for security training.

Instead of annual online security training for all employees, we implemented a new online training platform where employees receive an invitation to a short training/awareness session every second to third week featuring different security themes and surveys.

Each activity has a maximum duration of 2 minutes to minimise the impact on the employees' normal work.

We now have a good overview of the employees' knowledge and engagement and will continue to make more targeted activities for special groups of the organisation.

The list of topics focuses on the theme "social engineering", and the security mindset we want our employees to adopt is known as STAR behaviour:

- Stop
- Think
- **A**sk
- Report

Parallel with the online training, we are present on all the internal platforms, explaining security measures taken and guiding employees to secure behaviour with tips and tricks. Again, in the strong belief that security awareness should be part of all employees' everyday work.

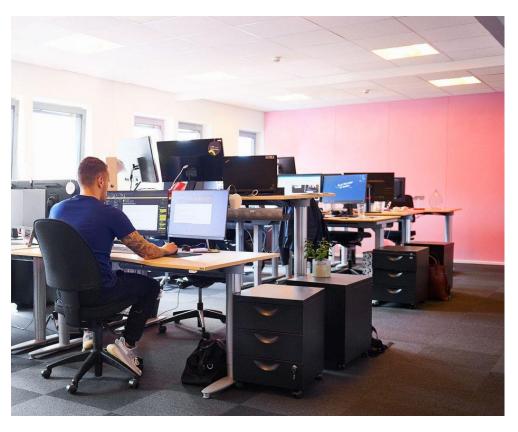
Furthermore, during the COVID-19 situation, working securely from home it has been an ongoing task to ensure that all employees have the right tools and mindset to continue business as usual in a secure way.

Similarly, Group Security ensures that transforming TDC and building TDC NET and Nuuday continue without compromising security.

#### 2021 outlook

In 2021, we will continue to raise security awareness and begin transforming online activities to on-premises activities to become a closer aspect of employees' everyday work.

Finally, we will strengthen our security competencies in TDC NET and Nuuday to secure the transformation as we continue our journey towards becoming best in class.



# Diversity and inclusion

#### Our approach

At TDC Group, we serve all areas of Danish society across age, gender, ethnic background, religion, ability, and sexual orientation. We want our employees to reflect the society in which we operate. We believe diversity will support us in creating a better working environment and better results.

We are proud that among our 7,484 employees we have 48 different nationalities, a wide age profile from 16 to 76 years of age, and numerous different backgrounds.

Nonetheless, despite having worked with diversity and inclusion (D&I) for many years, we are taking further steps to stimulate D&I, because we know that a diverse and inclusive culture fosters a more creative and innovative work environment.

Today, 28% of all employees at TDC are women, while 20% of all managers are women, so we understand that we have an important journey ahead. That has prompted us to set an ambitious goal to achieve 50/50 gender balance in management. With this ambition, we want to strengthen our business and send the message both internally and externally that TDC is a workplace with equal opportunities for anyone with the right skills and mindset to become a leader

#### 2020 performance

We have taken new steps to pursue our ambition for gender balance in leadership. By using data insights more extensively, we have been able to identify areas with the biggest potential for

improvement. One area is our ability to attract more diverse talent, and we have therefore implemented the Al-based software tool Develop Diverse, which helps us create inclusive and genderneutral job ads to attract a wider and more diverse pool of candidates for vacant positions.

In 2020, we introduced a new D&I programme for the entire top leadership team. Through the programme, top leaders are trained in unconscious biases and inclusive leadership to enable them to take ownership of D&I initiatives in their own branches of the business. Our leaders should embody our values of inclusion as good role models for the organisation.

#### A digital Denmark built by all, for all

Great potential exists in engaging more girls and women in shaping the digital Denmark of tomorrow. We therefore remain committed to supporting and encouraging young girls and women to pursue IT career paths.

Therefore, we collaborate with a wide range of educational institutions to inspire more girls and women to become interested in the career opportunities presented by IT and future technologies. We host Girls' Day in Science in collaboration with Naturvidenskabernes Hus and hold Tech Career Days in collaboration with the IT University of Copenhagen. In 2020, we extended our partnership with Women in Tech Denmark to include an internal network across TDC Group, Nuuday and TDC NET for women working in IT. We also collaborate with ReDI School, which is a non-profit tech school

offering IT courses to women with migrant and refugee backgrounds.

#### A culture of inclusion and equality

We believe differences enhance teamwork. That is why we promote a diverse workplace where we feel we can contribute and be our true selves.

In 2020, we continued our work to include and strengthen wellbeing for minority groups, including people with mental or physical disabilities, refugees, and people identifying as LGBT+. TDC was once again a main sponsor for Copenhagen Pride and during Pride Week, also hosted educational talks for all employees on LGBT+ inclusion and wellbeing at work. We remain a partner in the Ministry of Equality's industry focus group, which aims to create broad industry collaborations to support the inclusion and wellbeing of members of the LGBT+ community.

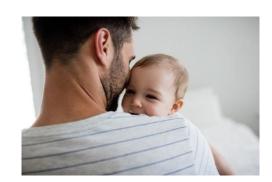
TDC Group offers its employees the opportunity to organise their work life to suit individual needs. reduced work capacity, busy family lives etc. and will continue to do so.

In accordance with this cornerstone aim, TDC hopes to encourage new fathers and non-birth mothers to take up to 14 weeks of paid partner leave. Our culture today is highly supportive of partner leave, and we are proud that more than 81% of fathers and non-birth mothers at TDC Group took leave in 2020.

#### 2021 outlook

In 2021, we aim to integrate a new D&I governance model to ensure that our goal for achieving gender balance in leadership is driven and monitored just as rigorously as any other strategic or financial target. Each business leader will be provided with ambitious yet realistic annual gender balance targets.

Besides a new governance structure, another focus in 2021 will be to foster a culture of inclusion and respect. Therefore, we will analyse our current culture as well as our focus on leader training in inclusive leadership and bias awareness – from our Board of Directors to our team leaders. Biasmitigating talent acquisition processes and talent management practices will also be a key focus in 2021 to drive continuous improvements in talent diversity at all levels.



# Risk management

#### Risk management

TOC

TDC Group faces both internal and external risks on which we focus in the short, medium and long term, as described in the following pages. These are accompanied by risks TDC Group has identified that could influence long-term growth if TDC Group were to become a low-margin service provider and potentially lost its corporate footprint and network utilisation. However, TDC Group implements strategic initiatives to mitigate these risks.

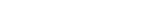
Risk management is an integrated, structured, and dynamic aspect of TDC Group's business operations and planning and is based on a hybrid of internationally recognised standards such as ISO, COSO, and NIST.

Risk assessments are conducted monthly with business lines and corporate functions identifying and updating all significant risks within the TDC Group risk universe. Risks are then consolidated and assessed based on their type, potential impact and probability, and the conclusions are then reported to the Risk Committee monthly, to the Corporate Management Team quarterly, the Audit Committee biannually, and the Board of Directors on an annual basis. Responsibilities are assigned for significant risks, which are monitored and evaluated monthly and compared with defined risk appetite levels. Mitigating initiatives are also established, tracked, and evaluated.

By their very nature, forward-looking statements involve certain risks and uncertainties. Risks not currently known to TDC Group, or emerging risks that TDC Group currently deems to be immaterial, may also adversely affect TDC Group's business, financial condition, and results of operations. The most essential risks and uncertainties that could be impacted by TDC Group's operations are stated but might not be limited to those listed be-

## TDC Group's Risk Management Process Cycle





## **ESG** risks

#### Risk **Management Approach** Governance

#### **Human Rights**

TDC Group's risks relating to human rights concern our employees, our customers, and the employees of partners and companies in our supply chain.

These include the risk of forced labour, discrimination or harassment and the misuse or loss of personal data through human error, data breaches, or other nefarious means.

As a signatory to the UN Global Compact since 2009, we take our commitment to acting responsibly, in line with the principles, very seriously. The inalienable right of all people to live free of discrimination and degrading treatment, and to have the right to freedom of association, collective bargaining and (data) privacy, is strongly supported at TDC. We do not tolerate the use of forced or child labour, discrimination, abuse, or harassment. We have in place an array of policies and procedures that support our efforts in this area. These are underpinned by activities including training, awareness raising, auditing, reporting and external certification, and include our:

- Partner Code of Conduct, covering respect for human rights. For more information, read the section 'Sustainable procurement'
- Vendor management audits and monitoring of strategic suppliers. Despite COVID-19, in 2020, six subcontractors of one closely monitored strategic partner underwent external third-party audits
- Group Personnel Policy. In 2020, the percentage of our employees covered by collective bargaining agreements increased to 88% from 84%. More information on our activities regarding employee wellbeing, health and safety and HR is provided in the sections 'Occupational Health & Safety' and 'Diversity & Inclusion'
- Occupational Health and Safety Policy and certification to ISO 45001 standard. In 2020, we upgraded our OHSAS 18001 Occupational Health & Safety certification to the ISO 45001 certificate one year ahead of schedule. For more information read the section 'Occupational Health & Safety'
- Data Ethics Policy. For more information, read the section 'Digital trust: GDPR and data ethics'
- Group Security Policies aligned with the ISO 27001 standard for data handling and IT security. Our B2B brand NetDesign is certified according to the standard. In 2020, 68% of our employees completed security training and 97% completed an e-learning course on GDPR and data privacy

As a result of the encompassing nature and utmost importance of respecting human rights and all that is entailed, the following three governance structures are maintained by TDC: the OH&S Committee of the Board of Directors, the Audit Committee of the Board of Directors, and the Executive Management.

Each of these committees has a system for monitoring and reporting on performance management and risk mitigation.

#### Anti-corruption and bribery

TDC Group is one of the largest private employers in Denmark with suppliers from around the globe.

The risk is always present that bribery or corrupt practices could influence business decisions.

Although as a country, Denmark is characterised by low levels of corruption, we continue to be vigilant regarding this agenda. We strongly support free and fair competition on open and transparent terms and do not accept business deals being entered into on a dubious or illegal basis, not when supplying goods or services to others, nor when goods or services are supplied to us. We have a zero-tolerance approach to corruption in any form, and do not accept that we as a company nor our employees offer or accept any kind of bribery. Our activities revolve around policy development, awareness raising and putting in place resources and employee training and include our:

- Whistleblower Policy, which allows for the anonymous reporting of suspected wrongdoings at the company directly to the Audit Committee of the Board of Directors. The policy is reviewed and updated on an annual basis. This process is accompanied by a cross-company communications drive to raise awareness. Over the past 12 months, building incident reporting has been in focus. One report was submitted to the whistleblower system in 2020
- · Gifts and Anti-Corruption Policy, through which TDC commits to comply with the United Nations Convention against Corruption, adopted in Merida. The policy is reviewed and revised on an annual basis
- Partner Code of Conduct for suppliers, partner organisations and employees
- Sustainability Policy

Governance for anti-corruption and bribery is the responsibility of the Audit Committee of the Board of Directors and the Executive Management.



Introduction

E: Environment S: Digital Denmark G: Governance

## **ESG** risks

Risk **Management Approach** Governance

#### **Environment and climate**

As the owner of critical digital infrastructure in Denmark, we make huge investments in our network to maintain our network service and to roll out new technologies every year. We are currently in the midst of a massive deployment of fibre and 5G.

This activity, our operations and our supply chain are related to several potential environment and climate risks. These include issues linked to the physical impacts of climate change. For example, changes to average seasonal temperatures and extremes may reduce our ability to rely on free air cooling at larger technical sites.

As a signatory to the UN Business Ambition for 1.5°C Pledge, we are committed to averting catastrophic climate change. Our commitment to the UN Global Compact principles also anchors our work on environmental issues, highlighting a precautionary approach as we undertake initiatives to promote environmental responsibility and encourage the development and rollout of environmentally friendly technologies. These commitments and activities are captured in a number of policies and certifications, including our:

- Sustainability Policy
- ISO 14001 certification, which covers all 10,000 of our addresses and 7,484 employees
- CO<sub>2</sub> Forum governance body and working group's efforts to deliver our CO<sub>2</sub> neutral target
- Detailed emissions reporting: In 2020, we undertook a complete Scope 3 inventory for the first time
- Scope 1, 2, and 3 targets, which will be submitted to the SBTi initiative in 2021
- Circular economy activities in operations
- Climate-related assessments and mitigation activities within our network and facilities
- Energy-efficiency initiatives and investments
- Supplier engagement
- Sustainability by Design in our Products: Focused on energy consumption and efficiency, single-use plastics, lightweight materials, and use of recycled materials

Governance for TDC's climate and environ-

Forum and the Executive Management.

ment activities is the responsibility of the CO<sub>2</sub>

TDC Group Sustainability Highlights 18



## **ESG** data tables

Energy & Emissions Intensity Ratio	2020	2019	2018
Energy intensity (MWh of electrical energy / TB of data usage)	0.010	0.012	0.013
Emissions intensity (tCO₂e of Scope 1 and 2 market-based emissions / TB			
of data usage)	0.004	0.005	0.006

Energy	2020	2019	2018
Petrol (MWh)	2,445	2,878	2,544
Diesel (MWh)	37,031	37,257	37,410
Oil (MWh)	373	279	410
Natural gas (MWh)	1,700	1,190	1,501
Electricity (MWh)	199,636	198,821	205,650
District heating (MWh)	20,615	20,908	20,022
Total Energy Consumption (MWh)	261,800	261,332	267,537

Emissions	2020	2019	2018
Scope 1 (metric tons CO₂e)	10,039	10,077	10,128
Scope 2 location based (metric tons CO <sub>2</sub> e)	28,380	31,080	43,557
Scope 2 market based (metric tons CO <sub>2</sub> e)	73,897	73,826	82,013
Scope 3 (metric tons CO <sub>2</sub> e)	210,298	218,004	-
Total Scope 1, 2 & 3 market-based emissions			
(metric tons CO₂e)	294,234	301,907	92,141

Emissions	2020	2019	2018
Scope 1 (%)	3	3	11
Scope 2 market-based (%)	25	24	89
Scope 3 (%)	72	72	0

Scope 3 by category	2020	2019	2018
1: Purchased goods and services & 2: Capital Goods (metric tons of CO <sub>2</sub> e)	158,355	155,730	-
3: Fuel and energy-related activities (metric tons of CO <sub>2</sub> e)	11,326	11,981	-
4: Upstream transportation and distribution (metric tons of $CO_2e$ )	7,216	7,440	-
5: Waste generated in operations (metric tons of $CO_2e$ )	60	48	-
6: Business travel (metric tons of CO <sub>2</sub> e)	285	1,652	-
7: Employee commuting (metric tons of CO <sub>2</sub> e)	2,938	12,493	-
11: Use of sold products (Direct) (metric tons of CO₂e)	28,502	27,488	-
12: End-of-life treatment of sold products (metric tons of $CO_2e$ )	57	31	-
13: Downstream leased assets (metric tons of CO <sub>2</sub> e)	1,560	1,143	-
Total Scope 3 emissions (metric tons CO <sub>2</sub> e)	210,298	218,004	-

Waste	2020	2019	2018
Mixed waste (metric tons)	717	-	-
Iron and metal (metric tons)	379	-	-
WEEE (metric tons)	194	-	-
Cardboard (metric tons)	326	-	-
Rest of waste (metric tons)	413	-	-
Total waste generated (metric tons)	2,029	2,339	2,965
Non-Hazardous - Landfill (metric tons)	27	25	-
Non-Hazardous - Composting (metric tons)	62	16	-
Non-Hazardous- Recycling (metric tons)	1,223	1,419	-
Non-Hazardous - Energy Recovery & Incineration (metric tons)	706	800	-
Non-Hazardous - Other (metric tons)	-	50	-
Total Non-Hazardous waste (metric tons)	2,018	2,310	-
Hazardous - Landfill (metric tons)	-	-	-
Hazardous - Composting (metric tons)	-	-	-
Hazardous - Recycling (metric tons)	9	26	-
Hazardous - Energy Recovery & Incineration (metric tons)	1	1	-
Hazardous - Other, incl. recycling and energy recovery (metric tons)	0	2	-
Total Hazardous waste (metric tons)	10	29	
Total waste disposed (metric tons)	2,029	2,339	2,965
Waste recycled (%)	61	64	72



## **ESG** data tables

Customer Product Refurbishment	2020	2019	2018
Refurbished CPEs (Number)	156,731	103,650	-
Percentage refurbished of total units (%)	36	-	-
Avoided e-waste (metric tons)	77	50	-

Employees by age group	2020	2019
Employees under 30 years old (Number)	1,904	2,272
Employees 30 - 50 years old (Number)	3,220	3,152
Employees over 50 years old (Number)	2,360	2,429

Employees by Gender	2020	2019
Men (Number)	5,419	5,608
Women (Number)	2,065	2,245
Men (%)	72	71
Women (%)	28	29

Employees by employment category	2020	2019
Manager - Male (Number)	571	559
Manager - Female (Number)	139	150
Non-Manager - Male (Number)	4,848	5,049
Non-Manager - Female (Number)	1,926	2,095

Employees by contract type	2020	2019
Employees on permanent contracts - Male (Number)	5,400	5,590
Employees on permanent contracts - Female (Number)	2,050	2,230
Employees on temporary contracts - Male (Number)	19	18
Employees on temporary contracts - Female (Number)	15	15

Employees by employment category	2020	2019
Manager - Male (%)	80	79
Manager - Female (%)	20	21
Non-Manager - Male (%)	72	71
Non-Manager - Female (%)	28	29

Employees by employment type	2020	2019
Employees in full-time employment - Male (Number)	5,227	4,951
Employees in full-time employment - Female (Number)	1,884	1,986
Employees in part-time employment - Male (Number)	192	657
Employees in part-time employment - Female (Number)	181	259

Employees covered by collective bargaining agreements		2019
Employees covered by collective bargaining agreements (%)	88	84

2020	2019
25	29
43	40
32	31
	25 43

Employee performance review – by gender & employee category		2019
Percentage of appraisal – managers/supervisors (male) (%)	95	79
Percentage of appraisal – managers/supervisors (female) (%)	100	85
Percentage of appraisal – non-management (male) (%)	96	75
Percentage of appraisal – non-management (female) (%)	99	71



## **ESG** data tables

Employee training	2020	2019
Average training hours (Hours per FTE)	17	27

Employee Statistics - other	2020	2019
Fathers and non-birth mothers taking parental leave (%)	81	
Number of different nationalities (Number)	48	
Age of oldest employee (Years)	76	
Age of youngest employee (Years)	16	

Occupational health & safety	2020	2019	2018
Fatalities (Number)	-	-	-
With lost time (Number)	45	40	35
Without lost time (Number)	65	77	65
Total (Number)	110	117	100
Days of absence (Number)	467	369	278
Injury incidence (Lost time injuries per 10,000 employees)	60	51	-
Rate of fatalities (per 1,000,000 hours)	-	-	-
Rate of High consequence work related injuries (per 1,000,000 hours)	4	3	-
Rate of work-related injuries (per 1,000,000 hours)	9	9	-
Rate of near miss accidents (per 1,000,000 hours)	8	12	-

Gender Representation - Board of Directors	Nuuday	TDC NET	TDC Group	TDC TELCO ApS	Dansk Kabel TV
Men (Number)	3	3	5	1	4
Women (Number)	-	-	2	2	-
Total (Number)	3	3	7	3	4
Men (%)	100	100	71	33	100
Women (%)	0	0	29	67	0

Other metrics	2020	2019	2018
Data transported			
Data transported (TB of data throughput)	19,110,816	17,234,424	15,661,566
Whistleblower reports			
Number of reports submitted to the whistleblower system	1	-	-
Employee Engagement			
Number of sustainability ambassadors	290		
Ambassadors as a percentage of whole employee base	4		
ESG Reporting (TDC Group on behalf of all three companies)			
GRESB Infrastructure ESG Score	65	61	-
EcoVadis Score	65	62	55
Customer Engagement			
Donations to Den Dansk Naturfond through YouSee More (Number)	26,043		
Increase in donations to Den Dansk Naturfond compared to 2019 (%)	n/a		
Donations to Børns Vilkår through YouSee More (Number)	63,651	50,004	
Increase in donations to Børns Vilkår compared to 2019 (%)	27		

Digital Denmark	2020
Digital Citizenship: WiFive	
Pupils who have tested their skills from start of programme to end 2020 (Number)	99,205
Percentage of total number of pupils in grade 2-6 in Denmark	30%
Schools that have been using WiFive (Number)	768
Total number of schools using WiFive in Denmark (%)	35%
Teachers that have been using WiFive (Number)	1,922
Digital Citizenship: Coding Class / IoT in Folkeskolen	
Classes participated in Coding Class and IoT in Folkeskolen (Number)	218
Children helped with acquiring digital skills through the Coding Class initiative since 2016	12,000
GDPR & Security e-learning	
Employees completing a GDPR e-learning (%)	95
Employees completing a data protection nano e-learning (%)	35
Employees completing security e-learning (%)	68
Engagement with Society	
Visitors to the Parents in a digital world web universe in the last 2 years (Number)	86,730
People reached through the campaign focusing on Sharenting as part of the partnership between Børns Vilkår and TDC Group (Number)	200,000+
Number of times in 2020 a child in need was helped by BørneTelefonen	52,721
Online meeting arranged on the online platform SnakSammen.dk as part of the partnership between Danish Red Cross and TDC NET (Number)	2,642