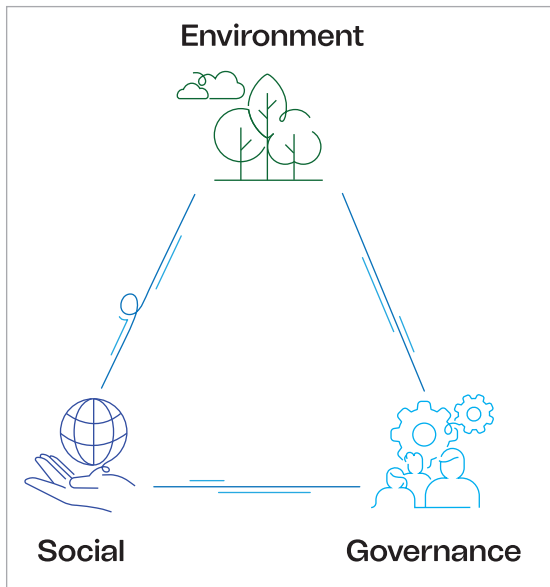




Environment, Social and Governance (ESG) Report



Grameenphone's operations have always focused towards ensuring sustainable and fair business practices. Throughout 2021, the company engaged with critical stakeholders and the greater community to battle climate change, conserve water and manage waste.

The Company's focus has been to reduce CO₂ emissions from its own operations, by converting a number of its sites to a grid-solar hybrid network from the existing generator – solar system; reducing carbon emission. Furthermore, Grameenphone has modernised and switched lead acid batteries with lithium-ion batteries, reducing carbon emissions by 600 tonnes.

People are a big part of how the Company has been able to deliver on these promises. 2021 was spent engaged with the development and upskilling of our people; due focus has been placed on inclusion and improving diversity in the workplace. As a responsible corporate citizen, the 'Child Online Safety' programme, run in association with UNICEF, has been further expanded to reach more than 250,000 children among the marginalised groups, in addition to their parents and guardians. Grameenphone continued to uphold the same high regard towards ethics, transparency, and corporate governance. At the same time to reinforce Grameenphone's commitment to respect human rights, the organisation also initiated human rights due diligence. One of the top priorities through the year has been building on and reinforcing existing governing processes for privacy and the handling of authority requests in order to maintain and manage data privacy and information security.

Throughout 2021, the Company had engaged heavily to broaden its ESG outlook towards meeting bigger environment, social, and governance ambitions. Moreover, the Company has reprioritised its efforts in order to balance business development with the expectations of stakeholders.



Environment

Our Mission

Grameenphone is committed to protecting the environment and contributing to the prevention of climate change.

Material topics



Climate change

Grameenphone aims to make the planet greener and more liveable for the generations to come by optimising energy consumption and increasing the use of renewable energy. Grameenphone's priority is to minimise its own CO₂ emissions from its operations (emission from fossil fuel and grid electricity).

Ambition

Grameenphone has set a target to reduce 50% carbon emissions (CO₂) by 2030, taking 2019 emissions as the baseline.

The Company is committed to the continuous deployment of enhanced sustainable solutions for an energy-efficient and environment-friendly network. In Grameenphone, we are continuously striving to minimise the environmental impact of our operations. Our ongoing programme focuses on four areas – i) reduction of carbon emissions, ii) creation of employee awareness, iii) adoption of green practices, and iv) societal advocacy to create awareness.

The Company adopted an EMS in 2010 in accordance with ISO 14001. Our EMS policy provides the framework for setting and reviewing our environmental objectives and targets.

Key Highlights 2021

- In 2021, Grameenphone had converted 36 tower sites with Generator+Solar to Commercial Power/ Grid electricity +Solar Hybrid sites. These Hybrid sites will provide additional savings of 197,100 litres of fuel reducing 263 tons of CO₂ emission annually.
- Upgraded 2,500 sites with Li-ion batteries in 2021. These sites are now running on battery back-up instead of generator power during grid unavailability. This Li-ion battery solution will help the Company reduce 291 tons of CO₂ emission.

- Initiated several programmes to reduce CO₂ emission through energy efficiency, limiting the use of valuable resources, reducing travel requirement for operations, and lastly creating greater environmental awareness among employees and stakeholders.



Water

Reduce our water footprint and enhance water availability in the communities where we operate.

Ambition

Maintaining 100% wastewater recycling every year.

Key Highlights 2021

In 2021, Grameenphone was able to reduce 6% water usage compared to 2020.



Waste

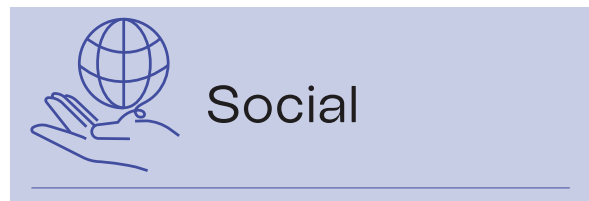
Reduce, Reuse and Recycle (The 3R's) policy helps to reduce e-waste as well as general waste and conserve natural resources.

Ambition

- Prioritising efficient waste management and supporting a circular economy

Key Highlights 2021

- As of 31st December 2021, more than 91 tons of e-waste (GSM, microwave antennas, and other electronic accessories) has been recycled through our recycling partner. Recycling is completed in Bangladesh and abroad in accordance with ISO 14000, OSHAS 18000, and R2 standards.
- Recycling of 100% used lead acid batteries has been set as our internal key performance indicator (KPI). In 2021, Grameenphone has recycled more than 80,000 old lead acid batteries.



Social

Our Mission

Grameenphone is committed to reducing inequalities and empowering societies by ensuring access to connectivity, digital and technological inclusion, as well as timely addressing social responses and environmental challenges. The ambition is to empower societies by reducing inequalities (SDG10), empowering women and girls (SDG5), and helping enable quality education (SDG4) through our services, social impact initiatives, and responsible business practices. Grameenphone is committed to maintaining responsible business practices throughout its entire supply chain, ensuring that its partners maintain the same standards and respect human rights



Material topics



Health, Safety & Security Performance

Grameenphone promotes high standard within Health, Safety and Security (HS&S) in order to ensure a healthy, safe and secure workplace. Securing sustainable business practices is crucial to maintain HS&S for our employees and for society. Ensuring well-being and a sustainable work-life balance will empower employees to perform in their roles and make Grameenphone an attractive employer.

Ambition

Grameenphone’s ambition is zero fatalities in our operations and supply chain across the value chain. To reach our long-term objective, we are continuously seeking to improve and define relevant measures to improve our health and safety performance. Focus on quality reporting is key for Grameenphone and we have implemented a revised set of key performance indicators (KPIs) to ensure quality reporting both internally and in our supply chain for fatalities and serious incidents.

The Company is focused on continuous improvement of HS&S parameters in order to establish a safe and healthy work environment by demonstrating its strong leadership commitment towards peoples’ safety across the value chain. With an aim towards zero fatalities, special emphasis has been placed on HS&S competence and capacity building, systematic HS&S risk analysis, control and proactive reporting. 13,692 hours of HS&S training and awareness were carried out for employees and partners.

The HS&S strategy outlines programmes for major initiatives and projects to create an Advanced HS&S culture and SCS ecosystem mindset across the value chain to establish safety as an integral part of the business by 2024.

Key highlights 2021

- Heightened precautionary measures have been taken to prevent the Covid-19 spread by reducing exposure. In order to control the pandemic, Grameenphone continued work from home and implemented digital ways to collaborate and work. The business operations have been resumed by adopting to the strict hygiene and health precautions while ensuring rigorous awareness across the value chain to serve customers in the best possible ways.
- Proactive initiatives like HS&S advisory, 24/7 doctor consultation, Covid-control guidelines, including use of PPE, have been enforced. As a duty of care, Covid-19 vaccination awareness for employees and partners were carried out.

- Road traffic accidents, including motorbike accidents, are accountable for 78% of the total incidents. Among all the road traffic accidents, 41% of the accidents are related to motorbikes. Road traffic accidents have traditionally been a contributor to serious incidents among our employees and value chain.
- The functional hazard identification-risk assessment and risk control (HI-RA-RC) process is being carried-out. Outcome from the process shall be taken as further improvement areas. Periodic training on road safety for the field forces has been initiated from Q2’21 which will continue every quarter. Safety briefing in ‘Toolbox Talk’ has been introduced and being practiced at every morning meetings.
- Serious incident close out rate (SICOR) for the organisation was set at 80% where Grameenphone scored 85%.

HS&S Incidents Reported	Year to Date (number of cases)		
	Employee	Supplier	Total
Near-Miss	11	3	14
First-Aid	3	18	21
Medical Treatment	2	5	7
Lost Time Injury	0	23	23
Fatality	0	1	1
Fire	4	1	5
Security	0	1	1
Any others	7	6	13
Unsafe Act/Unsafe Condition	296	25	321



Supply Chain Sustainability

A responsible and sustainable supply chain is a foundational element of Grameenphone’s long-term value creation. Grameenphone believes that partnership and cooperation with suppliers and industry peers is vital to achieve its ambition within supply chain sustainability.

Ambition

Supply Chain Sustainability continues to be one of Grameenphone’s strategic priorities and a key for long-term business success. Through the Agreement on responsible Business Conduct (ABC), Grameenphone’s Supplier Conduct Principles (SCP) are applicable for most supplier categories and contracts (based on risk assessments). The Supplier Conduct Principles are based on internationally recognised standards, including requirements on the respect for human rights, health and safety, labour rights, working conditions, conflict and other unsustainably mined minerals, environment, privacy and freedom of expression, and prohibited business practices.

Effective risk management in Grameenphone's supply chain will remain a priority in 2022. Grameenphone will continue to strive for its supply chain sustainability efforts to have a positive impact on the business as a whole, and in the societies in which it operates.

Key highlights 2021

- All suppliers and partners of Grameenphone have endorsed the Supplier Conduct Principles (SCP) and Agreement on responsible Business Conduct (ABC).
- Carried out 801 supplier inspections where 77 percent was Covid-19 virtual checks and 23 percent unannounced inspections.
- The inspections resulted in 11 major and 142 minor non-conformities, which were followed up with mitigation plans and further monitoring. The Non-conformity (NC) close out rate was 100 percent.
- Conducted 10,186 man-hours of capacity building to enhance the supply chains competence and capabilities.



Youth Upskilling

Grameenphone has a strong focus on youth upskilling as a core enabler to create economic opportunities for the youth of Bangladesh. Bangladesh has a massive youth population dividend, and it is imperative to upskill this population with job-ready skills to realise our national ambition to become a high-income country by 2041.

Ambitions

Grameenphone has ambition to enable and scale the initiatives of Grameenphone and relevant partners connected to nationwide youth upskilling with a more inclusive approach. We will further ramp up our commitment in this area with multi-stakeholder programmes to accelerate the journey of building our future generation.

Key highlights 2021

- GP Accelerator 'Growth X' Programme was launched to enable start-ups for growth. Five regional bootcamps were successfully held nationwide and six start-ups have been selected to grow beyond local boundaries. An online GPA Curriculum platform is being designed to allow free nationwide enablement for innovation for all.
- The GP Explorers Academy, an inhouse professional skill building initiative for tertiary level students, delivered its second cohort with 300+ participation nationwide. The cohort successfully completed the learning journey in Communication Skills, Entrepreneurship Mindset and Digital Marketing through a unique learning model. A

one-of-a-kind Master Class series was also arranged with the country's top leaders for the students of the GP Explorer Academy.

- Grameenphone has partnered on a multi-stake programme with UNDP to directly connect with the national agenda to enable youth for economic opportunities. Grameenphone has signed the partnership as the private sector lead to the coalition "FutureNation" with UNDP, Bangladesh. The FutureNation alliance between the government, private, and development sector has an ambition to impact 1 million youth through active programmatic initiatives.



Diversity, Equality, and Inclusion

Grameenphone is an equal opportunity employer with diversity and inclusion being an imperative approach to the way we do business. It is about creating services and solutions together that include the different perspectives of our employees, customers, stakeholders and partners. We continue to work systematically on diversity and inclusion, with a broadened agenda that includes gender, skills and competence.

Ambition

Over the last years Grameenphone has been working to bring the female representation towards a better balance through a focused project approach. With the commitment from leaders and the management team, year-on-year we have seen a strong positive movement in the curve since 2018. In 2021, we set a steep target of almost 3.5% YoY growth in the female: male ratio. This target was met and the female ratio at now stands at 15.9% as of 31 December 2021.

We will continue to drive this journey in full momentum to reach our ambition of 20% by 2023 and further to set the standards of Gender Diversity & Inclusion in Grameenphone as a benchmark in the local market and beyond.

Key highlights 2021

We took a structured approach with sprint based agile planning on focused activities such as:

- 87% female talent recruitment, including 21 Next Business Leaders in 2021.
- Introducing structured learning paths to guide females towards critical skill building with 40% participants completing the learning path.
- Using Grameenphone's top management champions of inclusive mindset in the organisation, to lead through dialogue and discussions.
- Female talents have been given special exposure through role mobility, mentorship and project work.

With these efforts and more, now, Grameenphone is at the highest female ratio over the last 10 years of 15.9%.





Child Online Safety

Children are increasingly exposed to an open and collaborative online culture, which allows them to access information, maintain friendships and strengthen relationships with family, create and share content. Therefore, it is more important to help children become online savvy and resilient and create an ecosystem where learning can thrive. Grameenphone works to stimulate a supportive ecosystem where children online are aware and safer, and parents and teachers have the much-needed resources that equip them to address online complexities.

Ambitions

Our efforts will continue to focus on creating a safer online experience for children through close collaboration with our sustainability partners, policy makers and relevant experts. This includes making available resources relevant to the communities, enable discussions for knowledge and awareness, facilitate trainings across the country irrespective of gender or economic backgrounds, as well as maintaining conversations with policy makers and opinion leaders.

Key highlights 2021

- Directly trained 250,000 adolescent girls and boys from marginalised communities.
- Continued online education and awareness through radio, parliament TV and social platforms to reach over 27 million people.
- Conducted two policy dialogues with policy makers, opinion leaders and experts to create awareness and commitment at the national level.



Disaster Response Initiatives

Ambitions

We will continue our commitment to stand beside the nation in times of natural disasters and calamities. We will do our best in terms of helping affected communities and restoring their conditions.

Key highlights 2021

In continuation of the effort to support the families who lost their livelihood due to the Covid-19 lockdowns, Grameenphone provided food assistance support to over 33,300 families across Bangladesh. The work was completed in partnership with BRAC under the initiative named "Dakche Amar Desh". Under this initiative, each family received BDT 1,500 cash support (to provide for two weeks of basic food requirements for a family of four). Grameenphone employees also participated to this effort and contributed to support over 1,160 additional families.



Human Rights

Grameenphone is committed to respecting human rights. To adhere with this commitment Grameenphone conducts regular human rights due diligence. In 2021, a due diligence exercise was conducted, engaging various internal stakeholders as well as employees from different suppliers.

Ambition

Grameenphone's ambition is to conduct continuous human rights due diligence within the organisation. This will be facilitated by generating greater human rights awareness throughout the organisation, with the aim of holistically mitigating prioritised impacts on human rights as far as possible.

Key Highlights 2021

- Conducted human rights due diligence in 2021.



Governance

Our Mission

Create and maintain sustainable shareholders' value, safeguard stakeholders' interest and investor's trust by maintaining the highest standards of governance and business conduct.

Material topics



Corporate governance

Grameenphone's principles and practices for Corporate Governance define a framework of rules and procedures for the way business is governed and controlled.

Ambitions

- Bringing the interests of all stakeholders to the fore through our empowered, diverse and inclusive Board.
- Building sustainable and responsible supply chains.
- Ensuring robust compliance and integrity practices.
- Engaging with stakeholders through various channels and earning trust through transparent communication.

Detailed information on the corporate governance is provided in the "Corporate Governance in Grameenphone" section of the Annual Report on page 23.



Data Privacy

As a provider of mobile and internet connectivity, respect for the rights to privacy and freedom of expression is central to Grameenphone's core business. Customers, government and other stakeholders demonstrate increasing concern and knowledge about privacy. If we cannot protect the data of our customers, our customers will not be willing to share it which will limit our ability to deliver data-driven services.

Ambitions

We strive to build a strong and trusted brand with high focus on our customers' privacy and security. We invest in knowledge, technology and services to ensure safe and secure connectivity for our customers and the societies they live in. These topics are prioritised at all levels of the organisation, and we continuously train ourselves to understand new threats and concerns. It remains a priority for Grameenphone to strengthen the link between risks, controls, mitigating actions and strategic choices and improve the privacy control framework.

Key highlights 2021

- We have improved oversight of data flows and personal data management across the organisation.
- In 2021, Grameenphone successfully completed the Privacy Programme, which resulted in a higher level of compliance with internal policy requirements on privacy.
- Provided training to all new employees on the importance of privacy and data protection.
- Conducted trainings on internal privacy processes, vendor management, data subject rights, authority requests and data breach handling.
- Updated Privacy Notice for customers to explain how their personal data is being collected and used.
- Revised governing documents for privacy and authority requests to align with the changes in circumstances, applicable laws and regulations.



Cyber Security

The nature of Grameenphone's business and its role as a provider of critical infrastructure means that it is at constant risk of basic and advanced cyber threats; with cyber-attacks being one of Telenor's top enterprise risks. Telenor faces a rapidly changing threat landscape with new technological risks and geopolitical instability. Repeated, prolonged or complex network or IT system failures could damage our services and consequently weaken the trust our customers place on us as a reliable communications provider.

Ambitions

In 2021, Grameenphone's updated its security strategy focusing on safeguarding customer data, critical infrastructure and business information. Our Business Security vision is that we always protect society and people in their digital life, and that security is the foundation of everything we do. By 2021, the aim is to professionally manage security risks and cyber

security threats according to industry best practices and local laws and regulations. By 2023, the ambition is to have security in all aspects of our business and all technology domains following a risk-based approach, with defensible architecture implemented for all critical assets.

Key highlights 2021

- In 2021, Grameenphone launched its security awareness programme "We are Security" to promote a security-first culture, measured and followed up as one of our strategic KPIs.
- During 2021, 98 percent of all Grameenphone employees completed security trainings, including on job tool security and work from home scenarios. In addition, we have introduced targeted awareness for top management teams as well as exposed functions and vendors.
- During 2021, it was observed critical cyber security alerts were reduced by 89 percent, indicating that our efforts to improve basic cyber security hygiene had successfully reduced basic security risks.
- Grameenphone have reached the global target of professionally managing security risks and cyber security threats according to industry best practices and local laws and regulations.



ESG Key Figures

Take a look at Grameenphone's latest social and environmental performance figures.

ESG Metrics	Q1'2021	Q2'2021	Q3'2021	Q4'2021
People & Organisation				
Women in total workforce (%)	13.3	13.8	14.1	15.9
Women in Board (%)	20.0	20.0	20.0	20.0
Women in new recruits (%)	71.4	100.0	85.0	87.5
Women in Extended Management positions (%)	14.0	15.1	12.5	30.0
Supply Chain Sustainability				
Capacity building of suppliers (man-hours)	2,571	3,508	7,656	10,186
Findings of Child Labour (below 15 years)	0	0	0	0
Percentage of Suppliers signed ABC	100%	100%	100%	100%
Direct Suppliers in scope for ABC	1,002	1,031	947	993
Sustainability inspections and audits carried out	231	485	662	801
Climate Change				
Total GHG emissions (thousand tonnes CO ₂ e) (market-based factors)	44	47	48	45
Direct GHG emissions/ Scope 1 (thousand tonnes CO ₂ e)	2	2.1	1.9	1.6
Indirect GHG emissions/ Scope 2 (thousand tonnes CO ₂ e)	42	45	46	43
Asia Scope 1+2 GHG emissions level in relevant year compared to emissions in base year 2019 (%)	102.8	96.4	97.8	96.8
Total energy use (GWh)	95.0	99.9	100.3	93.3
Number of solar base stations	1,194	1,194	1,194	1,194
Environment				
Municipal waste recycled (%)	100%	100%	100%	100%
Digital Inclusion				
Mobile Internet users (% of active data users)	52%	53%	55%	54%

