



8 June 2021

Peter Micek  
General Counsel  
Access Now

Dear Mr Micek,

Thank you for your letter dated 18 May 2021.

At Telenor Group respect for human rights is integral to our business, clearly stated in our policies, and approached with a focus on continuous improvement. As members of the Global Network Initiative and participants of the UN Global Compact, Telenor firmly believes in stakeholder engagement and transparency as important methods to uphold our human rights commitments. As a global company, Telenor acknowledges that we do face human rights challenges in markets where we operate, and we work to understand and mitigate negative human rights impacts we may have.

We were pleased that Telenor was found to have made key improvements in the 2020 Ranking Digital Rights (RDR) Corporate Accountability Index, including in our transparency efforts. Since the previous year we were able to include more data about government requests to restrict content or accounts and to shut down networks. The index also found that Telenor shows strong corporate governance and oversight over human rights issues across its global operations.

Telenor scored low on transparency around certain aspects of personal data processing, especially concerning targeted advertising and third party data sharing. In your letter you have specifically highlighted the following recommendation by RDR: *'Telenor should clearly disclose what options users have to control what data it collects and uses – including for targeted advertising.'*

Transparency on these activities is important to Telenor and we will take your comments into consideration in our work to improve the information provided to our data subjects. As part of our continuous efforts to improve our responsible business practices and live up to our principles, Telenor has committed to reporting on the Sustainability Accounting Standards Board (SASB) Telecommunication Services Standard. This will include reporting on policies and practices relating to behavioral advertising and customer privacy, and we aim to publish our first report in early 2022.

We have welcomed the opportunity to learn from the RDR process and to better understand what our stakeholders expect from us. Our continued engagement with the RDR team has helped us both to learn and improve our own processes as well provide feedback to the evolving RDR methodology.

We work to continuously improve our policies and practices across our operations around digital rights and are pleased to see that these efforts are being recognised, whilst also acknowledging that further efforts to improve can and will be made going forward.

Sincerely,



Cecilie Heuch

EVP and Chief People & Sustainability Officer

Telenor Group