

TDC ESG Accounting Principles

The TDC non-financial accounting principles set out the criteria, assumptions and principles upon which we calculate our non-financial data, energy consumption and greenhouse gas emissions.

The data concerned is published in our 2019 Annual Report, an integrated statement on TDC A/S' performance. Where possible, the ESG performance data includes the whole group of companies under this umbrella, e.g. TDC NET, Nuuday, and TDC Group.

The data reported covers 1 January – 31 December 2019.

Accuracy, Completeness & Estimations

We do our best to ensure that the activity data we collect is complete and based on actual data, e.g. invoices, meters, fuel cards. If this is not possible, we rely on estimations.

1. Environmental Data Reporting Boundaries

CO₂ emissions calculation methodology

In order to calculate our CO₂ emissions, we collect activity data, e.g. kilometres travelled by our technicians in their vans and GWh of electricity purchased across our operations on an annual basis.

This data is sourced from:

- Fuel data: Only data from company fuel cards, as these cards should be used for 100% of fuel purchased.
- Oil, natural gas, district heating, electricity: Taken directly from supplier invoices as volume or cost.

We use fuel conversion factors to convert our fuels into kWh. For petrol, diesel and oil, we use the official UK government / DEFRA fuel conversion factors.

We report our emissions in line with the World Business Council for Sustainable Development GHG Protocol methodology which classes emissions into 3 groups: Scope 1, 2 and 3.

At TDC, our Scope 3 emissions include only business land travel (rental car, train) and business air travel. We currently have insufficient data to include all our Scope 3 emissions. As part of our commitment to set Science Based Targets, we will be looking into our Scope 3 impact and setting targets to address our impacts.

To calculate emissions, we apply specific conversion factors to our activity data. We use emission factors from our suppliers, EnergiNet, and DEFRA (*Department for Environment, Food & Rural Affairs (2019) – UK Government GHG Emission Conversion Factors for Company Reporting*) to translate this activity data into CO₂ and greenhouse gas (GHG) or CO₂e emissions.

Emissions from Hiper are not included due to lack of available data.

Intensity Metric: Energy Intensity (purchased electricity)

In 2019, our energy intensity was calculated based on electrical energy consumed (GWh) per TeraByte of actual data traffic output in our network. The traffic reported is the average output traffic measured at the periphery of the network over a year.

Our traffic *output* is consistent with previous years' reporting.

Waste, Water, Paper

Our suppliers provide our consumption data. Due to changes in our reporting methodology this year (aligning with GRI), we are not able to provide comparative data for the different waste fractions from 2017 and 2018.

Volumes for Hiper, TDC Erhvervscentres and Flensborg are not included due to lack of available data.

2. Non-Environmental Data Reporting Boundaries

Occupational Health & Safety (OH&S) data

Our OH&S is calculated based on a headcount and excludes all employees who work 10 or fewer hours per week. Other definitions include:

- The number of fatalities is the tally of incidents reported during the year.
- The number of accidents with lost time is the tally of incidents reported during the year where the employees did not come to work the following day due to the accident.
- The number of accidents without lost time is the tally of incidents reported during the year where the employees came to work the day after the accident.
- The number of days of absence is the total combined number of days where employees were absent from work due to work-related incidents.
- The rates are calculated in line with GRI reporting standard 403-9, where the rate of X is equal to the number of incidents of X in the reporting year, multiplied by millions of hours worked. Hours worked is calculated based on the total headcount minus employees working 10 or fewer hours per week over 46 weeks (average work year minus 6 weeks of annual leave).

HR data

All HR data is based on headcounts.

The average number of training hours is calculated as the total number of hours of training provided to employees in 2019 at TDC locations and paid for by TDC, with no external training or courses included, divided by the total number of employees at year end (headcount).

Due to changes in our reporting methodology this year (aligning with GRI), we are not able to provide comparative data for 2017 and 2018.