

## GRI Context Index: 2020 Nuuday Annual Report

Nuuday's Annual Report 2020 has been prepared in accordance with the GRI Standard: Core option. The following standards have been identified as material to our ESG related reporting.

GRI Standard	Disclosure Number	Disclosure Title	Reporting Location	Omissions
General Disclosures	102-1	Name of the organization	Nuuday A/S	
General Disclosures	102-2	Activities, brands, products, and services	Nuuday is the largest connectivity, communication and entertainment service provider in Denmark, consisting of nine leading brands with a common goal of delivering innovative digital customer experiences to a variety of customer segments. Nuuday is the market leader within all segments where we operate: mobility services, internet & network, TV and landline. For more information, please see pages 7, 11, 12 and 21 of our Annual Report.	
General Disclosures	102-3	Location of headquarters	Nuuday A/S, Tegholmegade 1, 0900 København C	
General Disclosures	102-4	Location of operations	Denmark	
General Disclosures	102-5	Ownership and legal form	Nuuday A/S is owned by TDC A/S. For more information, please see page 81 of our Annual Report.	
General Disclosures	102-6	Markets served	Nuuday is the market leader within all segments where we operate: mobility services, internet & network, TV and landline. For more information, please see pages 7, 11, 12 and 21 of our Annual Report.	
General Disclosures	102-7	Scale of the organization	Please see the Financial Overview on page 9 of the Annual Report.	
General Disclosures	102-8	Information on employees and other workers	Please see the employee information on pages 35 and 108 of the Annual Report. Information on how the figures are calculated is in our <b>Nuuday ESG accounting principles</b> which are .	

General Disclosures	102-9	Supply chain	<p>Nuuday had almost 1,630 suppliers providing products and services in 2020. 80% of total spend was spent on their top 43 suppliers. Our procurement team and vendor management team are responsible for establishing and managing these relationships.</p> <p>As a signatory to the UN Global Compact through TDC Group, we take our commitment to acting responsibly in line with these principles very seriously. We use the TDC Group Partner Code of Conduct to outline our requirements for Nuuday employees as well as our suppliers in relation to human rights, labour conditions, the environment, anti-corruption, health and safety, data protection and security. This is published on our website.</p> <p>As a supplier ourselves, Nuuday is assessed as a part of TDC Group through the EcoVadis ESG assessment. In 2020, we were ranked among the top 10% of evaluated suppliers for our ESG performance. Further information on our approach to Sustainable Procurement and Supply Chain is available on page 33 of our Annual Report.</p>	
General Disclosures	102-10	Significant changes to the organization and its supply chain	Please see pages 5 to 7 and page 48 of our Annual Report.	
General Disclosures	102-11	Precautionary Principle or approach	Nuuday is committed to the UN Global Compact Principle because TDC Group is a signatory of the UN Global Compact principles. The 7th principle is the support for ad application of the precautionary approach for environmental issues or concerns. Our commitment to the UN Global Compact is outlined on page 5 of the TDC Group Sustainability Policy and page 7 of the TDC Group Partner Code of Conduct. Both of which are available on TDC Group website.	
General Disclosures	102-12	External initiatives	TDC Group has been a signatory of the UN Global Compact since 2009 and is a member of the UN Global Business Ambition for 1.5°C Pledge since 2019. As a	

			result, Nuuday is also a member of these commitments and organisations. Please see Memberships on page 33 of our Annual Report.	
General Disclosures	102-13	Membership of associations	Please see Memberships on page 33 of our Annual Report.	
General Disclosures	102-14	Statement from senior decision-maker	Please see Comment from our CEO on page 3 of the TDC Group Sustainability Highlights 2020 document on the TDC Group website.	
General Disclosures	102-15	Key impacts, risks, and opportunities	Please see Materiality on page 27, and ESG Risk on pages 36 and 40 of our Annual Report.	
General Disclosures	102-16	Values, principles, standards, and norms of behaviour	<p>We recognise that as part of society, we play an important role in operating responsibly, and as such, we are committed to taking a proactive approach. We comply with relevant laws and regulations but aspire to higher standards. It is critical that our partners, employees and customers trust us and feel secure when using our products and services. We actively engage with all our stakeholders to identify material issues and strategic priorities, and we are committed to the highest standards of ethical behaviour.</p> <p>Our approach to data security, privacy, and ethics is outlined in our various policies. Each brand within Nuuday has its own privacy policy. We also systematically manage risk and security, with regular assessments made both by in-house and external parties' continuous investment, and clear management focus on the topics, we have also developed a position on data ethics which is available on the TDC Group website.</p> <p>As a leader in our sector, we are also proud to contribute to the Danish economy both directly and indirectly through our employees. We are committed to paying taxes in accordance with laws and regulations wherever we do business, and we have</p>	

			<p>published our tax principles publicly to demonstrate our commitment to transparency. They are available on the TDC Group website.</p> <p>The TDC Group Partner Code of Conduct, which is also available on the TDC Group website, outlines our requirements for TDC employees as well as our suppliers in relation to human rights, labour conditions, the environment, anti-corruption, health and safety, data protection and security.</p> <p>For more, please see Our Approach in the How we do business section and Responsible Procurement &amp; Sustainable Supply Chain on page 33 of our Annual Report and on page 5 of the TDC Sustainability Policy on the TDC Group website.</p>	
General Disclosures	102-17	Mechanisms for advice and concerns about ethics	Please see our Whistleblower Policy available in both Danish and English on the TDC Group website, and page 33 of our Annual Report.	
General Disclosures	102-18	Governance structure	Please see information on TDC Groups' Board of Directors on pages 35 to 37, and the governance structure on page 10 of the TDC Group Annual Report and on the TDC Group website. ( <a href="https://tdcgroup.com/en/who-we-are/corporate-governance">https://tdcgroup.com/en/who-we-are/corporate-governance</a> )	
General Disclosures	102-19	Delegating authority	Please see Management Team on page 8 and Sustainability Governance Structure on page 27 of our Annual Report.	
General Disclosures	102-20	Executive-level responsibility for economic, environmental, and social topics	Please see Management Team on page 8 and Sustainability Governance Structure on page 27 of our Annual Report.	
General Disclosures	102-21	Consulting stakeholders on economic,	Please see Stakeholder Dialogue on page 33 of our Annual Report.	

		environmental, and social topics		
General Disclosures	102-22	Composition of the highest governance body and its committees	Please see information on TDC Groups' Board of Directors on pages 34 to 37 of the TDC Group Annual Report and on the TDC Group website. ( <a href="https://tdcgroup.com/en/who-we-are/corporate-governance">https://tdcgroup.com/en/who-we-are/corporate-governance</a> )	
General Disclosures	102-23	Chair of the highest governance body	Please see information on TDC Groups' Board Chairman on page 35 of the TDC Group Annual Report.	
General Disclosures	102-40	List of stakeholder groups	Please see Stakeholder Dialogue on page 33 of our Annual Report.	
General Disclosures	102-41	Collective bargaining agreements	88% of TDC employees are covered by collective bargaining agreements. Please see page 40 of our Annual Report (Human Rights).	
General Disclosures	102-42	Identifying and selecting stakeholders	Please see Stakeholder Dialogue on page 33 of our Annual Report.	
General Disclosures	102-43	Approach to stakeholder engagement	We engage with our stakeholders through formal and informal dialogues, through industry associations and working groups, in direct meetings and through our customer service calls and in our stores. Quantitative and qualitative engagement with stakeholders included surveys and interviews, and this input is integrated into how and what we work on. Due to the nature of 2020, the type and frequency of engagement changed dramatically throughout the year. Please see pages 27 and 33 of our Annual Report. Please also see page 11 of the TDC Group Annual Report available on the TDC Group website.	
General Disclosures	102-44	Key topics and concerns raised	Please see our Strategy and Materiality Matrix on pages 10 and 11 of the TDC Group Annual Report.	
General Disclosures	102-45	Entities included in the consolidated financial statements	Please see Accounting Policies page 48 of our Annual Report.	
General Disclosures	102-46	Defining report content and topic Boundaries	Please see pages 27 and 33 of our Annual Report. Please also see page 11 of the TDC Group Annual Report available on the TDC Group website.	

General Disclosures	102-47	List of material topics	Our material topics were identified as those that are of highest importance to both our stakeholders and the business. Please see Materiality Matrix on page 11 of the TDC Group Annual Report available on the TDC Group website.	
General Disclosures	102-48	Restatements of information	No significant restatements have been made. Any changes to previous years data are as a result of emissions factors corrections/update, but these are below the threshold for materiality. Please see pages 1 and 2 of <b>Nuuday ESG Accounting Principles</b> .	
General Disclosures	102-49	Changes in reporting	For changes in reporting, please see pages 1 and 2 of <b>Nuuday ESG Accounting Principles</b> .	
General Disclosures	102-50	Reporting period	The performance content of this report is published annually. The data reported covers 1 January –31 December 2020. Please see reporting boundary on page 1 of <b>Nuuday ESG Accounting Principles</b> .	
General Disclosures	102-51	Date of most recent report	The most recent previous CSR performance report was published in the TDC Group Annual Report 2019 on 10 March 2020. This is available on TDC Groups website.	
General Disclosures	102-52	Reporting cycle	The performance content of this report is published annually. Please see reporting boundary on page 1 of <b>Nuuday ESG Accounting Principles</b> .	
General Disclosures	102-53	Contact point for questions regarding the report	Contact details for the report and further information is on our website.	
General Disclosures	102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option; see pages 27, 110 and 111 of our Annual Report for the statement.	
General Disclosures	102-55	GRI content index	Our GRI content index is available on our corporate website.	
General Disclosures	102-56	External assurance	Our <b>Nuuday ESG Accounting Principles</b> are published online at our corporate website. Our data collection and reporting processes are reviewed for robustness and correctness and were assured by Deloitte prior to publication. Please see our Annual Report on page 110 for more information.	

<p>General Disclosures</p>	<p>103 (103-1, 103-2, 103-3)</p>	<p>Management Approach</p>	<p>Our sustainability strategy, which is based on our material issues, guides our environmental, social and governance activities. Our sustainability strategy 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.</p> <p>The TDC Group Director of Sustainability is responsible for implementing the sustainability strategy in operations and achieving our KPIs. In this task, she is assisted by the Sustainability Team and a large network of employee ‘Sustainability Ambassadors’ who are located in teams and brands across Nuuday. In addition, our governance is supplemented by project- or topic-specific checks and balances, which are externally audited, we strive to align our operations with international standards when applicable. For example, our environmental activities are tied to our ISO 14001 certified environmental management system, and our Occupational Health and Safety (OH&amp;S) approach is tied to our ISO 45001 certified OH&amp;S system and our data security approach, which is ISO certified at our brand NetDesign. 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 TDC Group Board of Directors or the Audit Committee of the TDC Group Board of Directors, that support strong governance within ESG. Finally, our ESG reporting is assured by an external third-party assessor.</p> <p>We publish information related to our ESG activities in order to increase transparency and facilitate benchmarking by our owners, investors, suppliers and</p>	
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			<p>other interested parties. As a part of TDC Group, our activities and performance are rated by both GRESB and EcoVadis, and we seek to demonstrate year-on-year improvement.</p> <p>Please see ESG Framework at TDC Group on page 10, Materiality on page 11, and Engaging our Stakeholders on page 16 of the TDC Group Annual Report.</p>	
General Disclosures	103-1	Explanation of the material topic and its boundary	Please see page Materiality on page 11 of the TDC Group Annual Report.	
General Disclosures	103-2	The management approach and its components	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. As a part of TDC Group, our activities and performance are rated by both GRESB and EcoVadis, and we seek to demonstrate year-on-year improvement. Please see ESG Framework at TDC Group on page 10, Materiality on page 11, and Engaging our Stakeholders on page 16 of the TDC Group Annual Report.	
General Disclosures	103-3	Evaluation of the management approach	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. As a part of TDC Group, our activities and performance are rated by both GRESB and EcoVadis, and we seek to demonstrate year-on-year improvement. Please see ESG Framework at TDC Group on page 10, Materiality on page 11, and Engaging our Stakeholders on page 16 of the TDC Group Annual Report.	
Economic Performance	201 (103-1, 103-2, 103-3)	Management Approach	Please see page 7 of the TDC Group Annual Report for information on our management approach to economic performance.	



Economic Performance	201-1	Direct economic value generated and distributed	Please see Financial statements starting on page 40 of the TDC Group Annual Report. Also, see the Financial Overview on page 9 of the TDC Group Annual Report.	TDC does not report figures for donations made.
Tax	207 (103-1, 103-2, 103-3)	Management Approach	As a leader in our industry, we are proud to contribute to the Danish economy, both directly and indirectly. To demonstrate our commitment to transparency, we have published our Tax Principles on the TDC Group website. Please also see page 57 of our Annual Report.	
Tax	207-1	Approach to tax	As a leader in our industry, we are proud to contribute to the Danish economy, both directly and indirectly. To demonstrate our commitment to transparency, we have published our Tax Principles on the TDC Group website.	
Energy	302 (103-1, 103-2, 103-3)	Management Approach	Please see page 31 of the Annual Report and page 3 and 4 of the TDC Group Sustainability Policy.	
Energy	302-1	Energy consumption within the organization	Please see the environmental data table on page 107 of our Annual Report and the <b>Nuuday ESG Accounting Principles</b> .	
Energy	302-4	Reduction of energy consumption	Please see pages 31 and 32 of the Annual Report, and the environmental data tables on page 107.	
Emissions	305 (103-1, 103-2, 103-3)	Management Approach	Please see page 31 of the Annual Report and page 3 and 4 of the TDC Group Sustainability Policy.	
Emissions	305-1	Direct (Scope 1) GHG emissions	Please see pages 31 and 32 and the environmental data table on page 107 of our Annual Report. Also please see the <b>Nuuday ESG Accounting Principles</b> .	
Emissions	305-2	Energy indirect (Scope 2) GHG emissions	Please see pages 31 and 32 and the environmental data table on page 107 of our Annual Report. Also please see the <b>Nuuday ESG Accounting Principles</b> .	
Emissions	305-3	Other indirect (Scope 3) GHG emissions	Please see pages 31, 32 and 107 of our Annual Report. Also please see the <b>Nuuday ESG Accounting Principles</b> .	
Waste	306 (103-1, 103-2, 103-3)	Management Approach	Please see pages 31 and 32 of our Annual Report and page 3 and 4 of the TDC Group Sustainability Policy.	

Waste	306-2	Management of significant waste-related impacts	Please see pages 31 and 32 and the environmental data table on page 107 of our Annual Report. Also please see the <b>Nuuday ESG Accounting Principles</b> .	
Waste	306-3	Waste generated	Please see pages 31 and 32 and the environmental data table on page 107 of our Annual Report. Also please see the <b>Nuuday ESG Accounting Principles</b> .	
Waste	306-4	Waste diverted from disposal	Please see pages 31 and 32 and the environmental data table on page 107 of our Annual Report. Also please see the <b>Nuuday ESG Accounting Principles</b> .	
Waste	306-5	Waste directed to disposal	Please see pages 31 and 32 and the environmental data table on page 107 of our Annual Report. Also please see the <b>Nuuday ESG Accounting Principles</b> .	
Occupational health and safety	403 (103-1, 103-2, 103-3)	Management Approach	Please see page 34 of our Annual Report.	
Occupational health and safety	403-1	Occupational health and safety management system	Please see page 34 of our Annual Report.	
Occupational health and safety	403-6	Promotion of worker health	Please see page 34 of our Annual Report.	
Occupational health and safety	403-9	Work-related injuries	Please see page 34 and the Occupational Health & Safety data table on page 109 of our Annual Report and the <b>Nuuday ESG Accounting Principles</b> .	
Training and education	404 (103-1, 103-2, 103-3)	Management Approach	Please see pages 34 and 35 of our Annual Report	
Training and education	404-1	Average hours of training per year per employee	Please see the Employee training HR data table on page 108 of our Annual Report, and the <b>Nuuday ESG Accounting Principles</b> .	This figure is not collected by gender or category.
Training and education	404-3	Percentage of employees receiving regular performance	Please see the Employee training HR data table on page 108 of our Annual Report, and the <b>Nuuday ESG Accounting Principles</b> .	

		and career development reviews		
Diversity and equal opportunity	405 (103-1, 103-2, 103-3)	Management Approach	Please see Diversity and Inclusion on page 35 of our Annual Report.	
Diversity and equal opportunity	405-1	Diversity of governance bodies and employees	Please see page 35 and the Gender Representation - Board of Directors data table on page 109 of our Annual Report, and the <b>Nuuday ESG Accounting Principles</b> . Please also see the ages of the TDC Group Board of Directors on pages 35 to 37 of the TDC Group Annual Report.	
Customer Privacy	418 (103-1, 103-2, 103-3)	Management Approach	Please see pages Security on page 34 and Digital Trust on page 35 of our Annual Report.	
Customer Privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Please see pages 19 and 20 of the TDC Group Annual Report.	

Other Material Issues	Reporting Location
Digital Skills (103-1, 103-2, 103-3)	Please see pages 29 and 30 and the Children's Digital Lives data table on page 109 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Business Purpose (103-1, 103-2, 103-3)	Please see pages 7 and 12 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Innovation, Investment (103-1, 103-2, 103-3)	Please see pages 12 and 20 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Cybersecurity (103-1, 103-2, 103-3)	Please see page 34 and the data table Children's Digital Lives data table on page 109 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Good business behaviour (103-1, 103-2, 103-3)	Please see page 33 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.
Customer Experience (103-1, 103-2, 103-3)	Please see pages 7, 12 to 17 of our Annual Report. Please also refer to the Materiality Matrix on page 11 of the TDC Group Annual Report.

Document	Link
2020 Annual Report	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/nuuday-annual-report-2020.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/nuuday-annual-report-2020.ashx</a>
Nuuday ESG Accounting Principles (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/nuuday-esg-accounting-principles.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/nuuday-esg-accounting-principles.ashx</a>
TDC Group Annual Report 2020	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/tdc-annual-report-2020.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/tdc-annual-report-2020.ashx</a>
TDC Group Sustainability Policy (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc_sustainability-policy-2019-uk.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc_sustainability-policy-2019-uk.ashx</a>
TDC Group Sustainability Policy (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-policy-2019-da.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-policy-2019-da.ashx</a>
TDC Group Whistleblower Policy (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/whistleblowing-tdc-october-2020.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/whistleblowing-tdc-october-2020.ashx</a>
Whistleblower Policy (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/whistleblowing-tdc-oktober-2020.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/whistleblowing-tdc-oktober-2020.ashx</a>
2019 TDC Group Annual Report (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/upload10march/tdc-group-annual-report-2019-optimized.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/upload10march/tdc-group-annual-report-2019-optimized.ashx</a>
TDC Group Partner Code of Conduct (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-uk---september-2018.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-uk---september-2018.ashx</a>
TDC Group Partner Code of Conduct (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-dk---september-2018.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-dk---september-2018.ashx</a>
TDC Group Data Ethics Policy (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/tdc-data-ethics-policy-2019.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/tdc-data-ethics-policy-2019.ashx</a>
TDC Group Data Ethics Policy (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/tdc-politik-for-dataetik-2019.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/tdc-politik-for-dataetik-2019.ashx</a>
TDC Group Anti-Corruption & Gift Policy (UK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/uk-policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/uk-policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx</a>
TDC Group Anti-Corruption & Gift Policy (DK)	<a href="https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/dk---policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx">https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/dk---policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx</a>