

GRI Context Index: 2020 TDC Annual Report

TDC Group'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	TDC A/S	
General Disclosures	102-2	Activities, brands, products, and services	<p>TDC Group's mission is to build and support an innovative, open model that will ensure all of Denmark connects to the new digital opportunities.</p> <p>To achieve our mission, we are the parent company to two companies, Nuuday and TDC NET, and we have defined their separate missions. Nuuday's mission is anchored in creating technologies and services for their customers that make sense in their everyday life. TDC NET's mission is to connect Denmark through fastest fixed connections and best mobile network in Denmark.</p> <p>Please see pages 3 and 5 of our Annual Report, and for more information on our customer brands please see https://nuuday.com/.</p>	
General Disclosures	102-3	Location of headquarters	TDC A/S, Teglhølmegade 1, 0900 København C	
General Disclosures	102-4	Location of operations	Denmark	

General Disclosures	102-5	Ownership and legal form	TDC A/S is a privately held company owned by the three Danish pension funds ATP, PKA, PFA and the infrastructure fund Macquarie Infrastructure and Real Assets. Please see page 4 of the Annual Report.	
General Disclosures	102-6	Markets served	TDC Group constitutes of two separate entities, Nuuday and TDC NET, each with their own distinctive business model. The activity within TDC A/S, thus, mainly relates to corporate functions and shared services to support Nuuday A/S and TDC NET A/S' business models. Please see pages 3 and 5 of the Annual Report.	
General Disclosures	102-7	Scale of the organization	Please see the 5-year overview on page 6 of the Annual Report.	
General Disclosures	102-8	Information on employees and other workers	Please see the employee information on pages 30 and 31 of the Annual Report. Information on how the figures are calculated is in our TDC Group ESG Accounting Principles which are on our website here: https://tdcgroup.com/en/responsibility/csr-reports	These figures are for TDC Group employees only. For detail on Nuuday and TDC NET employee's, please see their Annual Reports.
General Disclosures	102-9	Supply chain	TDC Group is the parent company of TDC NET and Nuuday. In 2020, TDC NET had more than 2,500 suppliers providing products and services. With 80% of total spend spent on their top 36 suppliers. 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 teams at Group, NET and Nuuday, as well as our vendor management team are responsible	

			<p>for establishing and managing these relationships.</p> <p>As a signatory to the UN Global Compact since 2009, we take our commitment to acting responsibly in line with these principles very seriously. Our Partner Code of Conduct 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. This is published on our website.</p> <p>As a supplier ourselves, TDC is assessed through the EcoVadis ESG assessment. In 2020, we were ranked among the top 10% of evaluated suppliers for our ESG performance.</p> <p>Further information on our approach to Sustainable Procurement and Supply Chain is available on page 17 of our Annual Report.</p>	
General Disclosures	102-10	Significant changes to the organization and its supply chain	Please see pages 3, 4 and 5 of our Annual Report.	
General Disclosures	102-11	Precautionary Principle or approach	TDC is a signatory of the UN Global Compact principles since 2009. 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 our sustainability policy and page 7 of our Partner Code of Conduct. Both of which are available on TDC Group website.	

General Disclosures	102-12	External initiatives	TDC 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. Please see Memberships on page 13 of our Annual Report.	
General Disclosures	102-13	Membership of associations	Please see Memberships on page 13 of our Annual Report.	
General Disclosures	102-14	Statement from senior decision-maker	Please see Comment from our CEO on page 3 of the Sustainability Highlights 2020 document on our website.	
General Disclosures	102-15	Key impacts, risks, and opportunities	Please see Materiality on page 11, Engaging with our Stakeholders on page 13 and ESG Risks on pages 27 and 28 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 TDC 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</p>	

			<p>management focus on the topics, we have also developed a position on data ethics which is available on our website.</p> <p>A critical pillar of TDC’s commercial strategy is the Talent Agenda, which encompasses employee attraction and retention. A huge effort is made to increase employee wellbeing while ensuring satisfaction and motivation levels are high. By maintaining diverse and inclusive workplaces that provide education, training, mobility opportunities, and through close collaboration with professional associations and unions, TDC consistently satisfies the agenda’s goals for employees.</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 published our tax principles publicly to demonstrate our commitment to transparency. They are available on our website.</p> <p>Our Partner Code of Conduct, which is also available on our 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>	
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			For more, please see Our Approach in the How we do business section and Sustainable Procurement on page 18 and page 5 of our Sustainability Policy.	
General Disclosures	102-17	Mechanisms for advice and concerns about ethics	Please see our Whistleblower Policy available in both Danish and English on our website, and pages 17, 27, 31 and 34 of our Annual Report.	
General Disclosures	102-18	Governance structure	Please see information on corporate governance on pages 33 and 34, our Board of Directors on pages 35, 36 and 37, our executive management on page 38, and our sustainability governance structures on pages 10, 27 and 28 of our Annual Report, as well as on our website.	
General Disclosures	102-19	Delegating authority	Please see Management Team on page 38 and Sustainability Governance Structure on page 10 of our Annual Report.	
General Disclosures	102-20	Executive-level responsibility for economic, environmental, and social topics	Please see Management Team on page 38 and Sustainability Governance Structure on page 10 of our Annual Report.	
General Disclosures	102-21	Consulting stakeholders on economic, environmental, and social topics	Please see Materiality on page 11 and Engaging with our Stakeholders on page 13 of our Annual Report.	
General Disclosures	102-22	Composition of the highest governance body and its committees	Please see information on Our Board of Directors on pages 35, 36 and 37 of our Annual Report and on our website.	
General Disclosures	102-23	Chair of the highest	Please see page 35 of our Annual Report.	

		governance body		
General Disclosures	102-40	List of stakeholder groups	Please see Materiality on page 11 and Engaging with our Stakeholders on page 13 of our Annual Report.	
General Disclosures	102-41	Collective bargaining agreements	88% of TDC employees are covered by collective bargaining agreements. Please see pages 27 (Human Rights) and 30 of our Annual Report.	
General Disclosures	102-42	Identifying and selecting stakeholders	Please see Materiality on page 11 and Engaging with our Stakeholders on page 13 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 Materiality on page 11 and Engaging with our Stakeholders on page 13 of our Annual Report.	
General Disclosures	102-44	Key topics and concerns raised	Please see our Strategy and Materiality Matrix on pages 10 and 11 of our Annual Report.	
General Disclosures	102-45	Entities included in the consolidated financial statements	Please see our TDC Group ESG Accounting Principles which is available on our website.	

General Disclosures	102-46	Defining report content and topic Boundaries	Please see Materiality Matrix on page 11 of our Annual Report.	
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 our Annual Report.	
General Disclosures	102-48	Restatements of information	No significant restatements have been made. Any changes to previous years data is as a result of emissions factors corrections/update, but these are below the threshold for materiality. Please see page 1 and 4 of TDC Group ESG Accounting Principles .	
General Disclosures	102-49	Changes in reporting	For changes in reporting, please see pages 1 and 4 of TDC Group ESG Accounting Principles .	
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 TDC Group ESG Accounting Principles .	
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 our corporate website.	
General Disclosures	102-52	Reporting cycle	The performance content of this report is published annually. Please see reporting boundary on page 1 of TDC Group ESG Accounting Principles .	
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 page 13 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 TDC Group ESG Accounting Principles 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 page 32 of our Annual Report.	
General Disclosures	103	Management Approach	Our sustainability strategy, which is based on our material issues, guides our environmental, social and governance activities. 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. The 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 TDC Group, TDC NET and Nuuday. In addition, our governance is supplemented by project- or topic-specific	

			<p>checks and balances, which are externally audited and 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&S) approach is tied to our ISO 45001 certified OH&S 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 assured by an external third-party assessor. 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. 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 our Annual Report.</p>	
General Disclosures	103-1	Explanation of the material	Please see page Materiality on page 11 of our Annual Report.	

		topic and it's boundary		
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. 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 our 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. 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 our Annual Report.	
Economic Performance	201 (103-1, 103-2, 103-3)	Management Approach	Please see page 3 - 7 of our Annual Report for information on our management approach to economic performance and Materiality on page 11.	
Economic Performance	201-1	Direct economic value generated and distributed	Please see the 5-year overview and financial performance starting on page 6 of our Annual Report.	TDC does not report figures for donations made.
Tax	207	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 our website.	
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 our website.	
Energy	302 (103-1, 103-2 and 103-3)	Management Approach	Please see pages 14-15 of the Annual Report and page 3 and 4 of our Sustainability Policy.	
Energy	302-1	Energy consumption within the organization	Please see pages 14 and 15 and the environmental data table on page 29 of our Annual Report, and pages 1-3 of the TDC Group ESG Accounting Principles on our website.	
Energy	302-4	Reduction of energy consumption	Please see pages 14-15 of the Annual Report.	
Emissions	305 (103-1, 103-2 and 103-3)	Management Approach	Please see pages 14-15 of the Annual Report and page 3 and 4 of our Sustainability Policy.	
Emissions	305-1	Direct (Scope 1) GHG emissions	Please see pages 14 and 15 and the environmental data table on page 29 of our Annual Report, and pages 1-3 of the TDC Group ESG Accounting Principles on our website	
Emissions	305-2	Energy indirect (Scope 2) GHG emissions	Please see pages 14 and 15 and the environmental data table on page 29 of our Annual Report, and pages 1-3 of the TDC Group ESG Accounting Principles on our website.	
Emissions	305-3	Other indirect (Scope 3) GHG emissions	Please see pages 14 and 15 and the environmental data table on page 29 of our Annual Report, and pages 1-3 of the	

			TDC Group ESG Accounting Principles on our website.	
Emissions	305-4	GHG emissions intensity	Please see the environmental data table on page 29 of our Annual Report, and pages 3 and 4 of the TDC Group ESG Accounting Principles on our website.	
Waste	306 (103-1, 103-2 and 103-3)	Management Approach	Please see pages 14, 15, 17 and the environmental data table on page 29 of our Annual Report, and page 4 of the TDC Group ESG Accounting Principles on our website of the Annual Report and pages 3 and 4 of our Sustainability Policy.	
Waste	306-2	Management of significant waste-related impacts	Please see pages 14, 15, 17 and the environmental data table on page 29 of our Annual Report, and page 4 of the TDC Group ESG Accounting Principles on our website of the Annual Report and pages 3 and 4 of our Sustainability Policy.	
Waste	306-3	Waste generated	Please see the environmental data table on page 29 of our Annual Report and page 4 of the TDC Group ESG Accounting Principles on our website.	
Waste	306-4	Waste diverted from disposal	Please see pages 15 and 17 of the Annual Report and the environmental data table on page 29 of our Annual Report. Also please see page 4 of the TDC Group ESG Accounting Principles on our website.	
Waste	306-5	Waste directed to disposal	Please see pages 15 and 17 of the Annual Report and the environmental data table on page 29 of our Annual Report. Also please see page 4 of the TDC Group ESG Accounting Principles on our website.	
Occupational health and safety	403 (103-1, 103-2 and 103-3)	Management Approach	Please see page 18 of our Annual Report.	

Occupational health and safety	403-1	Occupational health and safety management system	Please see page 18 of our Annual Report.	
Occupational health and safety	403-6	Promotion of worker health	Please see page 18 of our Annual Report.	
Occupational health and safety	403-9	Work-related injuries	Please see page 18 and the Occupational Health & Safety data table on page 31 of our Annual Report and page 4 of the TDC Group ESG Accounting Principles on our website.	
Training and education	404 (103-1, 103-2 and 103-3)	Management Approach	Please see pages 18-21 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 31 of our Annual Report and page 4 of the TDC Group ESG Accounting Principles on our website.	This figure is not collected by gender or employee category.
Training and education	404-3	Percentage of employees receiving regular performance and career development reviews	Please see the HR data table on page 30 of our Annual Report and page 4 of the TDC Group ESG Accounting Principles on our website.	
Diversity and equal opportunity	405 (103-1, 103-2 and 103-3)	Management Approach	Please see Diversity and Inclusion on page 21 of our Annual Report.	
Diversity and equal opportunity	405-1	Diversity of governance bodies and employees	Please see Diversity and Inclusion on page 21, the data table Employees by employment category on page 30 and the Gender Representation - Board of Directors data table on page 31 and our Board of Directors on pages 35 to 37 of	

			our Annual Report, and page 4 of the TDC Group ESG Accounting Principles on our website.	
Customer Privacy	418 (103-1, 103-2 and 103-3)	Management Approach	Please see pages 19 and 20, and the data table GDPR and Security e-learning on page 31 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 our Annual Report.	

Other Material Issues	Reporting Location
Digital Skills (103-1, 103-2 and 103-3)	Please see page 16 and the Digital Denmark data table on page 31 of our Annual Report. Please also refer to our Materiality Matrix on page 11.
Business Purpose (103-1, 103-2 and 103-3)	Please see pages 3 and 10 of our Annual Report. Please also refer to our Materiality Matrix on page 11.
Innovation, Investment (103-1, 103-2 and 103-3)	Please see pages 6, 7, 8 and 12 of our Annual Report. Please also refer to our Materiality Matrix on page 11.
Cybersecurity (103-1, 103-2 and 103-3)	Please see page 20 and the Digital Denmark data table on page 31 of our Annual Report. Please also refer to our Materiality Matrix on page 11.
Good business behaviour (103-1, 103-2 and 103-3)	Please see How we do business on page 17 of our Annual Report. Please also refer to our Materiality Matrix on page 11.
Customer Experience (103-1, 103-2 and 103-3)	Please see pages 23 and 24 of our Annual Report. Please also refer to our Materiality Matrix on page 11.

Document	Link
2020 Annual Report	https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/tdc-annual-report-2020.ashx
TDC Group ESG Accounting Principles (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsibility/tdc-group-esg-accounting-principles.ashx

Sustainability Policy (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc_sustainability-policy-2019-uk.ashx
Sustainability Policy (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-policy-2019-da.ashx
Whistleblower Policy (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/whistleblowing-tdc-october-2020.ashx
Whistleblower Policy (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/whistleblowing-tdc-oktober-2020.ashx
2019 Annual Report (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/credit-report/2020/upload10march/tdc-group-annual-report-2019-optimized.ashx
2019 Sustainability Highlights (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-highlights/tdcesg2019uk-090320201815.ashx
2019 Sustainability Highlights (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/sustainability-highlights/tdcesg2019dk-090320201815.ashx
Partner Code of Conduct (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-uk---september-2018.ashx
Partner Code of Conduct (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/documents/csr-2018/partner-code-of-conduct-for-tdc-group-dk---september-2018.ashx
Data Ethics Policy (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-data-ethics-policy-2019.ashx
Data Ethics Policy (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/tdc-politik-for-dataetik-2019.ashx
Anti-Corruption & Gift Policy (UK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/uk-policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx
Anti-Corruption & Gift Policy (DK)	https://tdcgroup.com/-/media/files/tdccom/documents/responsability/dk---policy-for-at-modtage-og-give-gaver-samt-deltagelse-i-arrangementer---tdccom.ashx