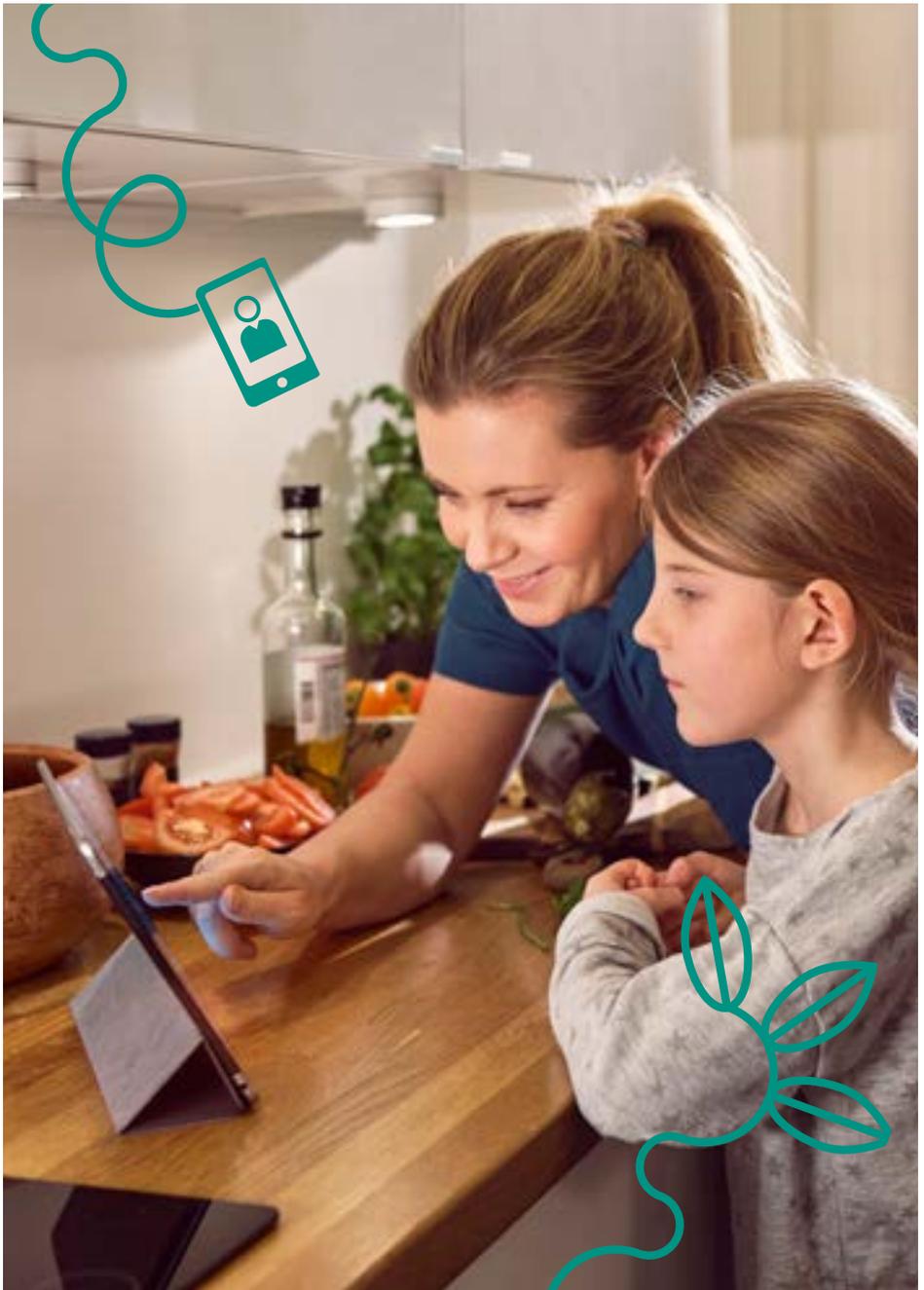
An aerial photograph of a rural landscape. In the foreground, there are green agricultural fields with distinct furrows. A dirt road runs diagonally across the middle ground, with a red tractor and a white car visible. To the left of the road is a small pond. In the background, there is a larger body of water, possibly a lake or reservoir, surrounded by trees and rolling hills under a clear blue sky.

Sustainability Policy

March 2019



Scope of Policy

At TDC Group, responsibility is a natural part of our business, based on our heritage and the role we play in society as a leading technology and communications company. We appreciate that as part of society, we have an important role to play in operating responsibly.



Our sustainability policy outlines our CSR commitments and strategic priorities and is intended to guide the actions of TDC management, employees, and suppliers in achieving our sustainability objectives. This policy is applicable to TDC Group and its operations in Denmark.

Strategy & Commitments

We are committed to take a proactive approach to operating responsibly, which includes at a minimum compliance with all relevant laws and regulations but is more extensive than this. We actively engage with our stakeholders to determine our material issues and strategic priorities. In each of our strategic priority areas we are working towards internal KPIs.

Our Strategic Priorities

1 Environmental Impact

We are committed to protect the environment and as a result, we continuously seek to reduce our operational, products' and services' impacts on the environment through a systematic framework of planning, managing, and reviewing of actions. We do this as part of our investment in our ISO 14001 certification. Our EMS incorporates initiatives on effective resource use, energy consumption, carbon emissions, waste / WEEE, and managing environmental risk.





Climate target:

100 % CO₂ neutral
by 2028

2 **Responsible Procurement & Sustainable Supply Chain**

Since 2009, we have been a signatory to the UN Global Compact and our commitment to acting responsibly in line with these principles is one we take seriously. We are committed to the principles of responsible procurement and our Partner Code of Conduct outlines our requirements for both TDC Group and our suppliers in relation to human rights, the environment, and other areas of concern. We use industry endorsed third party ESG monitoring and assessment platforms to evaluate our suppliers ESG performance and are committed to work with our suppliers on corrective actions if their ESG performance falls below the required level.



3 Community

We are committed to ensuring Digital Denmark through both country wide connectivity, as well as through promoting digital citizenship for all. We work as one company as well as in partnership with dedicated and knowledgeable representatives of civil society in promoting digital literacy, fostering innovation, and protecting vulnerable citizens online.



4 Ethical Behavior

It is critical that our customers trust us and feel secure when using our products and services. As a result, we are committed to the highest standards of ethical behaviour. Our approach to data security, privacy, and ethics are outlined in our various policies. We take a systematic approach to risk management around security, with regular assessments made both by in-house and external parties, continuous investments, control and management focus, we strive to be the best in the Nordic countries. Each brand within the TDC Group has its own privacy policy. As a group, we have also developed a position on data ethics. You can read more on our position on data ethics on our website. We are also proud that as a company that we are contributing financially to Danish society. We are committed to paying taxes in accordance with laws and regulation wherever we do business and we aim to report the right and proper amount of tax according to where value is created. You can read more on our tax principles [here](#).



Governance & Reporting

This policy is maintained and reviewed on an annual basis by our CSR team. Responsibility for the implementation of the policy lies with each employee whose work falls within the scope of this policy and we strive to ensure that all employees and suppliers understand its contents.

CSR Reporting

We are committed to transparency and alignment with global best practice. We produce an annual CSR Report to document our CSR performance and progress against our targets, including our contribution to the UN Sustainable Development Goals.



Policy Owner: Mr. Jens Aaløse, Senior Executive Vice President, Stakeholder Relations & Group Chief People Officer, TDC A/S
Approved By: TDC A/S Board of Directors
Date: 12th June 2019