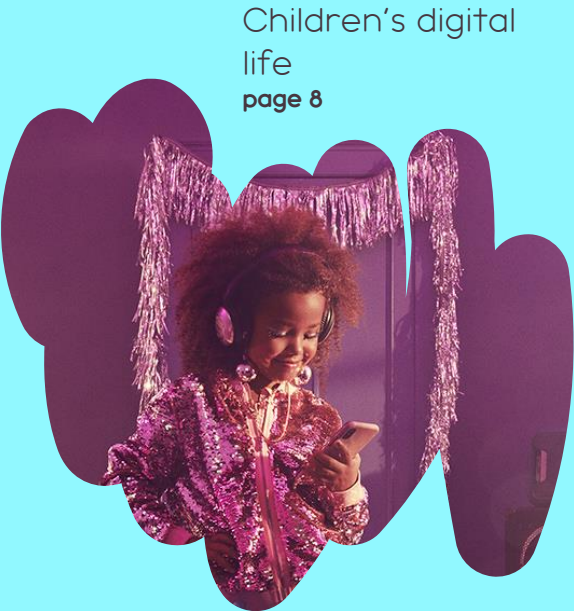


Nuuday Sustainability Report 2021

nuuday

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Shortcut to reading the ESG report
Click on the tabs in the menu to navigate quickly to the tables of contents for the report and accounts, respectively.

Letter from the CEO

2021 marked a strategic turning point for Nuuday with the appointment of a new management team, the launch of a rapid transformation journey, and Nuuday's financial separation from TDC Group as of 1 January 2022.

As an independent service provider, Nuuday is on a journey to become the most digital service provider offering Danish households and businesses the best choice and best customer experience. Likewise, we aim to implement our very ambitious sustainability agenda to become one of the most sustainable telcos in the world within this decade, rapidly moving towards carbon neutrality.

At Nuuday, we believe in running our business in a sustainable manner because we want to take responsibility for the impact we have on society. We achieve this by taking a strategic approach and focusing our sustainability efforts on three key areas: children's digital life, climate and environment, and responsible operations.

In 2021, we made good progress on all aspects of ESG (Environment, Society and Governance). We also earned a

platinum rating from EcoVadis – the world's most trusted business sustainability rating platform – a recognition of our efforts within sustainability.

Regarding environmental performance, we had the pleasure of seeing the Science Based Targets initiative approve our scope 1, 2 and 3 targets for CO2 emissions. This is fuelling our journey towards becoming one of the most sustainable telcos in the world with carbon neutrality in scopes 1 and 2 by 2028 and in scope 3 by 2030.

Nuuday's social performance included expanding our collaboration with partners, not least Børns Vilkår (Children's Welfare), with whom we launched a new digital tool, 'The Family Screen Check', which drives a responsible approach to children's exposure to digital communication.

In terms of governance, we made further progress by establishing ourselves as an independent service provider. This work will continue throughout 2022 to reflect the separation from TDC Group and the emergence of Nuuday as an independent entity.



We also adopted a Nuuday Diversity, Equity, Inclusion and Belonging Strategy, while management launched a process to further develop Nuuday's emphasis on mental well-being among our employees.

You can find much more about our sustainability targets and activities, as well as our performance and ambitions for the coming year in this report, which covers the Nuuday A/S' ESG performance and was prepared in accordance with sections 99a, 99b and 99d of the Danish

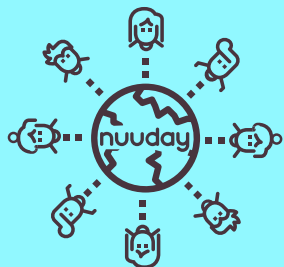
Financial Statements Act. It also serves as our Communication on Progress for the UN Global Compact, of which Nuuday is a proud member. We will continue to show commitment to the 10 principles of the UN Global Compact.

Jon James

CEO

Nuuday at a glance

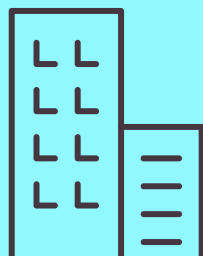
Nuuday is Denmark's leading telecoms service provider consisting of nine brands, spanning connectivity, communication and entertainment that share the common goal of helping consumers and businesses make sense with technology



5.9m

Customer relations (RGUs) in Nuuday

Our customer relations



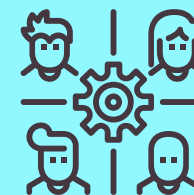
1.8m

Business incl. mobile partners



4.1m

Consumer



3,686

Employees

Revenue
(DKKbn)

14.7

EBITDA
(DKKbn)

1.8

CAPEX
(DKKbn)

1.1

Our Brands

youSee

T E L M O R E

HIPER

eesy
Bare mobil

you^{TV}

BLOCKBUSTER®

NetDesign

Relatel

TDC Erhverv

Sustainability at Nuuday

Our approach

At Nuuday, we are committed to be running our business in a responsible and sustainable manner, as we believe this is vital for the long-term sustainability of our business and a necessity to exist and compete in modern society.

As a company, we address our most material issues, and we take a stand to make a difference and make technology a force for good.

Since 2009, we have been a signatory to the UN Global Compact, and our approach to sustainability is based on the ten principles on human rights, labour, environment, and anti-corruption. We operate within an ESG framework covering the environmental, social and governance pillars that are fundamental to address sustainable and responsible development, and we have made significant commitments internally and externally to solve for a more sustainable future for all.

Our sustainability strategy and policy

The sustainability strategy was launched in 2019. We continue to deliver on this ambitious and publicly disclosed strategic foundation which still reflects Nuuday as an independent business. Nevertheless, we will prioritise to revise this strategy and adopt a distinct Nuuday strategy in the course of 2022 to clearly reflect

Nuuday as an independent service provider.

The strategic pillars driving our strategy and policy are:

- Children's digital life
- Climate & environment
- Responsible operations


As a signatory to UN Global Compact, we are committed to the UN Sustainable Development Goals, and not least SDG #13 on Climate Action that is supported by our Science Based Target initiative-approved carbon emissions reduction targets.


In the course of 2022, we will receive the newly appointed Board of Directors' formal approval of the SDGs that Nuuday is today informally guided by in our sustainability work.


As of 1 January 2022, Nuuday has adopted a revised sustainability policy that reflects the separation of TDC Group into Nuuday and TDC NET respectively.

Nuuday's sustainability policy is based on our three-pillared ESG-approach and reflects the markets we operate in, and the responsiveness we like to have towards our many stakeholders. This demonstrates our desire to make

Sustainability framework







Climate and environment:

Through ambitious carbon emissions reduction targets covering scopes 1, 2 and 3, we try to alleviate the negative impact our operations have on society by pursuing the goal of becoming carbon neutral.

Children's digital life:

Through partnerships and activities, we involve ourselves in the surrounding community and take a responsible approach to children's exposure to digital communication.

Responsible operations:

Through distinct programmes on a set of issues covering safety, security, diversity, procurement, and other streams, we strive to run our company in a responsible manner when dealing with suppliers, employees and stakeholders

an impact and actively operate and develop Nuuday in a way that promotes sustainability and contributes positively towards societal development.

ESG governance

Our executive management team is responsible for ensuring that our targets are achieved, and our strategy and policy are translated into activities that drive real progress.

The newly established Nuuday Board of Directors will oversee the sustainability work. Besides receiving interim updates when necessary, and a full report once a year as a minimum, the Board will conduct a thorough assessment of the strategy, progress and supporting policies.

At the operational level, our head of sustainability is responsible for the day-to-day implementation of the sustainability strategy, including achieving our KPIs, as well as policy compliance. This task involves the coordinating with multiple external and internal stakeholders, not least colleagues in Procurement, Legal and HR who are responsible for individual issue-specific policies covering data protection, privacy and data ethics, anti-corruption, IT security and other ESG-related issues.

Our governance is also supplemented by project- or topic-specific checks and balances, and our ESG data reporting has been externally assured by a third-party assessor.

We have obtained certain ISO certifications to reflect the validity of our

performance: our environmental activities align with our ISO-14001-certified environmental management system, our health and safety approach complies with our ISO-45001-certified health and safety system, and our work on data security aligns with our ISO 27001 certification at NetDesign.

Board of Directors

Executive Management

Head of sustainability

Sustainability ambassadors



A year of transition

For Nuuday, 2021 was in many ways a year in transition. We continued coping with the implications of COVID-19 on our business and society while working hard to finalise Nuuday's separation from TDC Group and launching a significant IT transformation that aims to transform Nuuday into a lean, digital and customer-centric service provider.

Becoming an independent service provider

In 2021, Nuuday completed the financial separation from TDC Group and entered 2022 as a financially independent entity with a newly appointed Board of Directors to guide and oversee Nuuday's future.

One of the first decisions by the Board was to approve the launch of a deep IT transformation with a significant investment allocated to replacing legacy platforms and systems to transform Nuuday into a lean, digital and customer-centric service provider.

Nuuday must now demonstrate its new independence in several areas – also in sustainability, where the strategy, policy and governance inherited from TDC Group must be tailored to a Nuuday context throughout 2022.

This in no way implies that Nuuday will change its sustainability aspirations, but rather that several adjustments are required to reflect the recently gained independence.

Sustainability in the shadow of COVID-19

In 2021, COVID-19 continued to cause significant disturbance in the society where Nuuday operates. COVID-19 was categorised as a critical threat to society by the Danish authorities for a large part of 2021. Nuuday employees were therefore encouraged to work from home for long periods and were ordered to do so when infection rates peaked. This complicated certain operations where physical on-site work was required, but it also fostered creativity and innovation, as society and customers demanded still more technological answers to the challenges of COVID-19.

As a large digital service provider, Nuuday continued in 2021 – as in 2020 – to turn experience gained from COVID-19 into a long-term catalyst for digitalisation. At YouSee, we quintupled our broadband speed from 100 Mbit/s to 500 Mbit/s for half a million Danish households to meet the needs of people working from home and children missing school and social activities.

We are proud to say that we once again supported our business customers in difficult times and helped critical functions during COVID-19. At TDC Erhverv we set up built-to-order fibre for test centres and continued to set up new VPN connections enabling customers' employees to work remotely. Also, SMEs made use of the 30-day free trial for our conversion solution to rapidly adapt to a home-office setup.

On the consumer side, we continued to provide more free mobile data and extra content free of charge to bring joy and simplicity to our customers in a difficult time. We also temporarily transformed the YouSee retail shops into customer call centres to support customers during forced lockdowns.



Children's digital life

Our approach

At Nuuday, we support initiatives that strengthen children's digital skills and hopefully give them an appetite to pursue opportunities that lie in technologies of the future and in making sense with technology. We do this through long-standing partnerships and activities based on a responsible approach to children's exposure to digital communication.

Educating with technology: Coding Class and Girls' Day in Science

At Nuuday, we take responsibility for providing children with digital skills of the future. By giving school pupils the opportunity to challenge themselves with exercises involving coding and programming, we help future generations to gain a basic understanding of the digital foundation on which our society is built.

Through the Coding Class initiative, sixth graders learn to innovate and create digital solutions for real, everyday challenges. For the sixth time, we had the pleasure of opening our doors in Copenhagen to sixth graders from Sankt Annæ Gymnasium, who proposed programming-based solutions and ideas to help make YouSee's services more relevant to young people. During the month leading up to the visit, the pupils had worked on using IT and technology to develop solutions to real-world challenges.

We also see potential in engaging more girls and women in shaping tomorrow's digital Denmark. Therefore, we collaborate with a wide range of educational institutions to get more girls and women interested in career opportunities within IT and the future of technology. In 2021, we hosted Girls' Day in Science in collaboration with Naturvidenskabernes Hus, and Tech Career Days in collaboration with the IT University of Copenhagen.

23,000+



children have had their digital skills enhanced through the Coding Class initiative since 2016



Børns Vilkår (Children's Welfare) and YouSee: Together for a better digital daily life

Today, parents face the daunting prospect of considering and handling new challenges when their children begin exploring the many opportunities offered by a digital world. Many parents find they are ill-equipped to understand the digital sphere where their children interact. That has become evident thanks to our strong partnership with the Danish children's organisation Børns Vilkår.

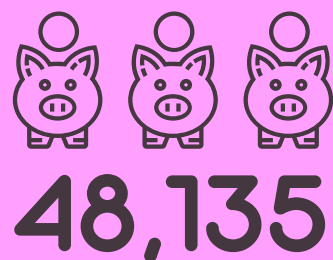
At Nuuday, we care about our customers and work to improve the digital daily lives of families in Denmark. We believe that technology can be a force for good, but we also acknowledge that the digital transformation families are undergoing brings challenges for many. We have therefore joined forces with Børns Vilkår to help families cope with the digital transition they are facing. Our joint mission is to inspire, strengthen and support the role parents play in their children's digital lives.

By increasing parents' understanding and engagement in their children's digital activities, we believe that families can more easily handle the digital challenges they face and reach the balanced digital daily life they desire. That is why we have teamed up to give families useful tools.

We launched the partnership based on the insight that two out of three Danish parents wish to become better role models regarding their children's digital

life, and that the most frequent digital conflict centres on screen time (Epinion survey among parents in Denmark with children aged 6 to 12 years).

Together with Børns Vilkår, in 2021 we developed a guiding universe for Danish parents and a new digital tool, 'The Family Screen Check', that tests parents as digital role models and provides insights into how screens affect everyday life. In a joint digital campaign across Denmark, we created awareness and engagement among parents via social platforms, newsletters and PR that reached more than 1 million Danes across digital platforms.



donations made to Børns Vilkår through the YouSee More programme

TDC Erhverv and BørneTelefonen: Round-the-clock counselling for children and young people

BørneTelefonen (Children's Helpline) is a unique support line for children and young people in need of help. It is operated by the Danish non-profit organisation Børns Vilkår, and even in a modern welfare society it plays an important role. In 2021, over 55,000 counselling sessions were conducted by telephone, chat, text message and e-mail.

Providing an open and reliable service

BørneTelefonen is staffed by 700 professionally trained volunteers. It is crucial that the technology does not fail and since BørneTelefonen was founded in 1987, TDC Erhverv has donated both the technology and services to ensure that these lines of communication are available.

Constantly improving

We are committed to helping develop BørneTelefonen's services. Most recently, we introduced a wallboard that provides an easy overview of calls throughout the day. Staffing can now be adjusted more easily, ensuring that fewer children call in vain.

In 2021, BørneTelefonen opened round-the-clock services – every day of the year – rather than closing for five hours during the night. This will also help more young callers get in touch with a volunteer when they need to.

A longstanding partnership

We are very proud to deliver the technology that enables children and young people to call anonymously and feel safe as they reach out for help – often for the first time.

We are equally grateful for the wholehearted support from our employees and customers alike. Last year, TDC Erhverv's bicycle network rode 50,000 km to fundraise for Børns Vilkår, and for eight years in a row, we have replaced our traditional Christmas gifts to customers with further donations to BørneTelefonen.



55,324

times a child in need was helped by BørneTelefonen in 2021

Climate and environment

Our approach

Digital technologies can potentially deliver significant carbon reductions. This is particularly true for a telco industry delivering high-speed connectivity that can reduce physical travel, transportation and some aspects of physical production. However, connectivity is not without environmental costs. Our offerings and services require electricity to operate, and our equipment requires large-scale manufacturing and the use of rare earth minerals. Managing this negative impact is our responsibility, and therefore Nuuday is actively engaged in the climate and environment agenda.

Nuuday has ample opportunity to play an active part in reducing CO2 emissions, increasing our focus on energy efficiency and enhancing refurbishment. We maintain a systematic framework of impact assessments, gap analyses, initiative planning and active management, all guided by our materiality matrix and based on the ISO 14001 Environmental Management System framework.

We consider both our own operations and the upstream and downstream impacts of our business when planning initiatives. We believe this approach helps us build a resilient, lean business that creates shared value for the environment, society and shareholders.

Our ambitions

We have ambitious climate targets: to be 100% CO2 neutral by 2028 in terms of our direct emissions (scopes 1 and 2), and to reduce them by 50% by 2023. We have also set a Science Based Target in line with the protocols of the Science Based Targets initiative (SBTi), including scope 3.

2021 activities and performance

In 2021, we managed to make good progress on our climate and environment agenda, fuelled by an ambitious new target to become carbon neutral in scope 3 by 2030.

The Science Based Targets initiative approved our near-term climate targets aligned with the 1.5-degree scenario, which added further impetus to our ambitious journey to become one of the most sustainable telcos in the world and carbon neutral in scopes 1 and 2 by 2028 and in scope 3 by 2030.

Through our cooperation with TDC NET, in 2021, we co-signed a power purchasing agreement for four new solar parks in Denmark that will be operational in 2022. This will result in the development of new renewable energy resources to cover our electricity consumption without compromising others' access, and a positive impact on our scope 2 electricity consumption in the years ahead.

Through a dedicated effort to increase our recycling rates, we managed to increase our refurbishment rate of total customer premise equipment units from 36% to 41%, and also increased the waste recycling rate from 47% to 51%.

Within sustainable procurement, 2021 marked a shift in emphasis highlighting our supplier dialogues based on our new scope 3 target. With annual spend data in mind, we have approached key suppliers and urged them to report to EcoVadis – the world's most trusted business sustainability rating platform. We also make sure that climate and environment ambitions are reflected in contract negotiations with new vendors.

In a wider context, our own sustainability ambitions were recognised by EcoVadis awarding us a platinum rating in recognition of our sustainability efforts.

Energy and emissions performance

In 2021, we reported a 1% decline in our operational CO2e emissions (scopes 1 and 2) compared with the previous year, driven by a small reduction in energy used. Electricity accounted for the bulk of this difference. Consumption declined despite the higher level of activity in 2021 compared with 2020, when COVID-19 had an even stronger impact on Nuuday with the closure of retail outlets and employees working remotely during lockdowns.

On top of this, we achieved a 1% reduction in the amount of transport fuel consumed (scope 1). Again, this decline in consumption should be viewed alongside the somewhat higher level of activity in 2021.

Scope 3 emissions

In 2021, we updated the first ever inventory of our scope 3 emissions that was conducted in 2020 and uncovered our indirect upstream and downstream emissions in detail and demonstrated the true climate impact of our operations relative to our whole value chain.

Following the separation of TDC Group into Nuuday and TDC NET, we have recalculated the baseline. The updated inventory shows that the scale of our scope 3 emissions is almost 22 times greater than our direct emissions, with the largest emitters being: purchased goods and services, capital goods, and use of sold products. Going forward, we will intensify dialogue with key suppliers to try to jointly reduce scope 3 emissions.

Resource management

In 2021, we recycled 51% of our waste and reported an increase of 4 percentage points compared with 2020. Almost 44% of our waste went to energy recovery (incineration), and less than 2% went to landfills. We will continue to focus on

Climate & environment (continued)

waste in our operations and will try to further increase our recycling rates.

We also continued our work on reducing the lifecycle impact of our customer premises equipment by promoting circular processes through refurbishment and reuse. In 2021, we refurbished almost 180,000 units and thus increased the refurbishment rate from 36% to 41% of all units. By doing so, we avoided 75 metric tons of e-waste in 2021, thereby reducing the need to manufacture new customer premises equipment.

Customer engagement and recognition

For most of 2021, YouSee continued to give its customers in the YouSee More programme the possibility of supporting Danish nature and biodiversity through Den Danske Naturfond. Throughout the year, YouSee More customers made more than 26,000 donations to support Danish nature.

Outlook for 2022

Having set sail on our short-, medium-, and long-term carbon emissions reduction journey, in 2022, we will focus on delivering results. In 2022, we will start to receive renewable electricity from the first solar parks that we have signed power purchasing agreements with, thereby reducing CO2 emissions and delivering on our short-term emissions reduction target for scopes 1 and 2 by

2023. Furthermore, we plan to launch a pilot project on transitioning our fleet away from fossil fuels by exploring alternative options.

Our sustainable procurement efforts will continue to strengthen our processes as we engage with key suppliers to influence their product development and strategic orientation to reduce scope 3 emissions. Following the separation of TDC Group, we are contemplating re-joining the Joint Audit Committee (JAC) to coordinate our onsite audits of suppliers with industry peers and use the EcoVadis platform to closely track supplier progress.



Responsible operations

Interacting with customers, suppliers, and stakeholders

Our approach

We are aware of our responsibility to operate in a conscientious and transparent manner. It is critical that our partners, employees and customers trust us and feel secure when using our products and services. We comply with the relevant laws and regulations and seek to continuously improve our policies and practices through external benchmarking assessments, certification and other external validation procedures.



Certifications and ESG assessments

We have three ISO certifications across our business covering environmental management (ISO 14001), occupational health and safety (ISO 45001), and IT security (ISO 27001). We publish information related to our ESG activities to increase transparency and facilitate benchmarking by our owners, investors, suppliers and other interested parties. As we were part of TDC Group throughout 2021, our activities and performance were assessed by EcoVadis as such. In 2021, we received an EcoVadis score of

75, up 10 points from 2020, thereby earning a platinum rating. This places Nuuday (TDC Group) in the top 1% among the most sustainable companies in the world.

Sustainable procurement

In our supply chain, we focus on the environmental impact of the products we buy, as well as human and labour rights, and health and safety along the whole value chain. In 2021, we strengthened our sustainable procurement programme in partnership with peers through industry initiatives involving screening of and engagement with our suppliers. In 2022, we will continue to raise the bar concerning the level of feedback we expect from our suppliers.

Stakeholder dialogue

To ensure we capture stakeholder concerns, we actively engage with all stakeholders to identify material issues and strategic priorities. Our stakeholders include the authorities and regulators, customers, employees, investors, management, media, owners, partners, interest organisations, suppliers and business partners.

Memberships

Nuuday is a proud member of specially selected organisations and is committed to sustainable development.

We collaborate with the Telecoms Industry Association (TI), the Danish Chamber of Commerce (Dansk Erhverv), and Danske Mediedistributører (DMD). We also participate in the association of mobile network operators worldwide (GSMA), and the Joint Audit Committee (JAC), an association of telecom operators working to further ESG implementation in the ICT supply chain. Membership of JAC was through TDC Group, and Nuuday must therefore reapply for membership in 2022.

In Q4 2021, Nuuday was approved as a signatory to the UN Global Compact, replacing the historic relationship of TDC Group. Adhering to the UN Global Compact principles, we have a suite of policies and procedures. Employees who are unfamiliar with these must complete a training course. The policies and procedures are all publicly available and include our whistleblower policy, anti-corruption and gift policy, sustainability policy, data ethics policy, data privacy policy and partner code of conduct.

Through TDC Group, we signed the UN Business Ambition for 1.5°C Pledge and are working towards fulfilling our commitments and CO2 emissions reduction targets approved by the Science Based Targets initiative.



Health and safety

Our approach to health and safety

Our organisation is structured in line with the Danish Working Environment Act and based on our ISO 45001 certification. In Q4 2021, we began the initial preparations for separating the Joint Health & Safety Committee from the former TDC Group setup. In 2022, Nuuday will establish its own Health & Safety Committee consisting of the head of health and safety, employee representatives from the health and safety organisation, representatives from the trade unions, and representatives from the executive management.


Health and safety risks

In 2021, the major health and safety risk for Nuuday employees was primarily the spread of COVID-19. Nuuday formed its own COVID-19 Task Force to ensure alignment with the guidelines from the Danish Authorities and to keep Nuuday employees safe.

2021 performance

In the autumn of 2021, Nuuday combined its internal MyVoice and Bradley surveys to conduct one survey that measures both employee engagement and the maturity of our health and safety culture. The MyVoice/Bradley score for Nuuday was 82/100 in 2021. The score reflects that the health and safety culture is mature and based on a high level of awareness and personal responsibility among employees and managers. To

further strengthen the culture, we will develop and implement action plans throughout the organisation.

 **2022 health & safety outlook**

In 2022, we will run two large projects to increase our focus on mental health and safety:

- "Looking after you and me": A project to build stronger understanding of the elements and effects of our social behaviour
- "Stress prevention skills": A project to increase people's resilience to stress

Occupational health and safety data		2021
Fatalities		0
Incidents with lost time		8
Incidents without lost time		30
Total		38
Days of absence		216
Injury incidence (lost-time injuries per 10,000 employees)		20
Rate of fatalities (per 1,000,000 hours)		0
Rate of high-consequence work-related injuries (per 1,000,000 hours)		1.24
Rate of work-related injuries (per 1,000,000 hours)		5.91
Rate of near-miss accidents (per 1,000,000 hours)		8.24

Diversity and inclusion

Our approach

At Nuuday, we pride ourselves on our diversity. But as we accelerate our transformational journey, we must strengthen our focus on building an even more diverse and inclusive culture where everyone can bring their best efforts to work and feel they belong. We see this as a key enabler for remaining competitive and adapting to rapidly shifting market dynamics.

To that end, in 2021, we developed our Nuuday Diversity, Equity, Inclusion & Belonging (DEIB) Strategy, which describes not only our aspirations and our ambitions in terms of the progress we want to make but also our approach. It is the trajectory we believe we must follow to truly accelerate.

Our DEIB aspirations are anchored in the four pillars that guide our approach and support the integration of DEIB into our culture, leadership and core people processes. The four pillars centre around our mission: 'We care to do better' for our society, our customers, our workplace and our people.

2021 performance

Our commitment to the DEIB agenda is reflected in our Nuuday DEIB Policy, which was adopted at the end of 2021. Also, in 2021, we established the Nuuday DEIB Council specifically to provide strategic governance and oversight of the roll-out of our Nuuday DEIB Strategy.

To further strengthen cultural awareness at Nuuday, we hosted 3 'Women in Tech' events, and during Copenhagen Pride Week, we hosted a 'Diversity@Work Academy'. We also ran a Diversity and Inclusion Culture survey, which provided not only great insights but also a baseline for measuring our progress in this important area.

To build a more diverse Nuuday, our focus in 2021 was to increase our pool of diverse applicants for vacant positions. One key lever in this regard was the implementation of software that supports bias-free writing by recognising biased words and proposing inclusive alternatives. Another initiative involved introducing new vendor agreements with our head-hunters to produce more diverse shortlists of potential candidates.

Finally, in 2021, we repositioned our policy on harassment prevention and resolution, and to increase trust and ensure anonymity, we decided to outsource our whistleblower case handling to an external party.

Gender diversity in management

When it comes to gender diversity in management, we operate with clear ambitions but do not aim to achieve those by setting quotas. Instead, we apply a programmatic and leader-led approach to attracting diverse applicants at all levels of our company by identifying and eliminating potential barriers, to ensure equity in advancement opportunities and foster an inclusive work environment

where diversity thrives in support of our strategic ambitions and priorities.

At the end of 2021, 19% of all leaders in Nuuday – and 31% of our workforce – were women. Our ambition is to get the gender balance right, as this will also pave the way for a more inclusive and diverse culture in general. This is supported by specific target commitments for gender balance in management at all Nuuday Business Units.

Nuuday's newly appointed Board of Directors comprises five male members and one female member. At Nuuday's subsidiary, TDC TELCO ApS, the Board of Directors has two male members and one female member. Nuuday's Board has in 2021 decided that the underrepresented gender must constitute no less than 1/3 of the Board members by the end of 2023. Nuuday has not yet reached this target as the Board was just recently established. However, we will make the necessary adjustments to meet the target in 2023.



2022 outlook

In 2022, all leaders will be trained in 'Inclusive leader: Driving High-Performing teams'.



Digital trust

Our approach

Compliance with data regulations is of utmost importance, and we aim to ensure that general data protection regulation (GDPR) requirements and provisions are upheld. Through both organisational and technical measures, we ensure that we process personal data safely, securely and in compliance with relevant legislation.

In connection with the separation of TDC Group into Nuuday and TDC NET, a Nuuday Data Protection Officer (DPO) was appointed. The DPO drives the data protection agenda at Nuuday from a central viewpoint and is supported by Data Privacy Managers (DPMs) anchored locally across the entire organisation. The DPMs are responsible for the day-to-day processes and GDPR compliance. The DPO liaises with the supervisory authority and reports to the Board of Directors via the Audit Committee.

All employees should complete e-learning training on GDPR and personal data compliance and pass a test every 18 months. This is also a mandatory component of the onboarding process for all new employees. Other supplementary educational and awareness initiatives apply for employees who handle personal data every day. Over the past year, 87% of all Nuuday employees have completed e-learning training on GDPR and personal data compliance.

Nuuday Data ethics policy

As the final phase of separating TDC Group into Nuuday and TDC NET progressed during 2021, we developed a Nuuday version of the former TDC Group policy on data ethics, which was adopted by year-end. The policy has been developed with input from managers at Nuuday who specifically handle personal data and work in areas that involve aspects of data ethics.

The updated policy includes guidelines and is supported by a consideration model that will steer decision-making and promote a certain course of development when working with data at Nuuday. The model ensures that we include the necessary considerations in relation to external actors regardless of whether a specific situation is covered by our guidelines. In

parallel with this work, discussions and plans began for further anchoring the policy in the organisation. Implementing data ethics will be an extension of our existing structures and processes for security and data protection.

2022 outlook

Our focus in 2022 will be on policy anchoring and implementation. The first step will be to integrate the guidelines and model for ethical considerations into the existing Data Privacy Process in Nuuday's Department for Data and AI. We will also develop a governance structure to ensure that the policy is solidly anchored throughout the organisation.



Security

Our approach

In what was another record year for the number of reported data breaches globally, security is and remains a top priority, with our own approach based on four principles: to protect our company, customers, employees, and citizens.

As part of the recently completed demerger of TDC Group into Nuuday and TDC NET, in 2021, Nuuday establish an independent security organisation. Our comprehensive security policy is rooted in best practices and compliance with ISO 27001 standards and encompasses IT as well as information and physical security. Risk identification and mitigation are priorities, in addition to providing situational awareness training and information for all Nuuday employees.

2021 security performance

We continued to invest in and strengthen our operational security, and effectively managed the risk from Log4 that hit most companies in Q4.

We conducted security awareness training and other activities to increase the knowledge level among Nuuday employees. For simulated phishing campaigns carried out, there was a noticeable improvement on the previous year concerning the number of employees who reported the phishing e-mails, the number who clicked on links, as well as the

number of employees who submitted data. Also, once again, the Nuuday brand NetDesign achieved ISO 27001 recertification.



2022 Security outlook

In 2022, we will continue to focus on security awareness with a tailored approach for individual functions and roles, while aiming to integrate security risk management into Nuuday's overall enterprise risk management setup.



ESG risks

Risks	Safeguards	Governance
<p>Human rights</p> <p>Nuuday’s risks relating to human rights concern our direct employees, our customers, and the employees of partners and companies in our supply chain; including the risk of forced labour, discrimination or harassment and misuse or loss of personal data, or data breaches.</p>	<p>The inalienable right of all people to live free of discrimination and degrading treatment and to have their right to freedom of association, collective bargaining and (data) privacy are strongly supported at Nuuday. We have in place an array of procedures and policies that support our efforts in these areas. Based on a thorough risk assessment, we conduct audits at our suppliers each year particularly screening for adherence to the UN Global Compact Principles on labour.</p> <p>These are supported by activities including training, awareness raising, auditing, reporting and external certification.</p> <ul style="list-style-type: none">• Our Partner Code of Conduct includes respect for human rights• Personnel policy: 88% of employees are covered by collective agreements• Occupational health and safety policy and certification to ISO 45001 standard• Group security policies are aligned with ISO 27001. NetDesign is ISO 27001 certified	<p>The following governance structures are in place: the H&S Committee of the Board of Directors (from Q1 22), the Audit Committee of the Board of Directors, and the Executive Management. Each of these committees has a system of monitoring and reporting.</p>
<p>Anti-corruption and bribery</p> <p>Nuuday is a large employer in Denmark with suppliers across the globe. There is always a risk that bribery or corrupt practices could influence business decisions.</p>	<p>We have a zero-tolerance approach to corruption in any form. Our activities revolve around policy development, awareness raising and putting in place resources and training for employees.</p> <p>These are supported by:</p> <ul style="list-style-type: none">• Our whistleblower policy that allows for the anonymous reporting of suspected wrongdoings at the company.• Our gifts and anti-corruption policy commits Nuuday to complying with the UN Convention against Corruption• Our Partner Code of Conduct for suppliers, partner organisations and employees	<p>Governance for anti-corruption and bribery is the responsibility of the Executive Management and the Audit Committee of the Nuuday Board of Directors.</p>
<p>Environment and climate</p> <p>Several potential environmental and climate risks may be linked to our operations and supply chain. These include issues related to the physical impacts of climate change that may also threaten to disturb our supply chain through extreme weather events.</p>	<p>Our commitment to the UN Business Ambition for 1.5°C Pledge and the UN Global Compact principles anchor our work on environmental issues.</p> <p>These commitments and activities are captured in various policies and certifications:</p> <ul style="list-style-type: none">• Our sustainability policy• ISO 14001 certification covering our whole operation• Detailed emissions reporting• Circular economy activities in operations and supplier engagement• Sustainability by design in our services	<p>Governance for climate and environment activities is the responsibility of the Executive Management and the Board of Directors.</p>

ESG data

Environmental data

Energy & emissions

	2021	2020	2019
Electricity (GWh)	6,8	6,9	7,1
Heat (GWh)	10,9	11,3	11,1
Transport (GWh)	6,8	6,8	7,1
Total energy consumption (GWh)	24,5	24,9	25,3
2030 baseline			
Scope 1 (metric tons CO ₂ e)	1,745	1,768	1,819
Scope 2 location based (metric tons CO ₂ e)	1,487	1,388	1,796
Scope 2 market-based (metric tons CO ₂ e)	3,106	3,127	3,395
Scope 3 (metric tons CO ₂ e)	105,123	96,069	113,940
Total Scopes 1, 2 & 3 market-based emissions (metric tons CO₂e)	109,975	100,964	119,154

Waste

	2021
Non-hazardous – landfill (metric tons)	10,98
Non-hazardous – composting (metric tons)	19,75
Non-hazardous – recycling (metric tons)	303,45
Non-hazardous – energy recovery & incineration (metric tons)	270,88
Total non-hazardous waste (metric tons)	605,05
Hazardous – landfill (metric tons)	0,04
Hazardous – composting (metric tons)	0
Hazardous – recycling (metric tons)	16,12
Hazardous – energy recovery & incineration (metric tons)	0,1
Hazardous – other, incl. recycling and energy recovery (metric tons)	0
Total hazardous waste (metric tons)	16,26
Total waste disposed of (metric tons)	621,32
Waste recycled (%)	51,4

Scope 3 by category

	2021	2020	2019
1: Purchased goods and services & 2: Capital goods (metric tons of CO ₂ e)	76,041	71,234	77,227
3: Fuel and energy-related activities (metric tons of CO ₂ e)	1,133	900	933
4: Upstream transportation and distribution (metric tons of CO ₂ e)	44	158	141
5: Waste generated by operations (metric tons of CO ₂ e)	14	36	31
6: Business travel (metric tons of CO ₂ e)	168	158	994
7: Employee commuting (metric tons of CO ₂ e)	1,039	1,069	7,745
11: Use of sold products (Direct) (metric tons of CO ₂ e)	26,654	22,460	26,839
12: End-of-life treatment of sold products (metric tons of CO ₂ e)	30	53	30
Total Scope 3 emissions (metric tons of CO₂e)	105,123	96,069	113,940

Customer product refurbishment

	2021	2020
Refurbished CPEs (number)	179,672	156,731
Percentage refurbished of total units (%)	41	36
Avoided e-waste (metric tons)	75,4	77

Note: Due to the split of TDC Group into Nuuday and TDC NET, constituting a structural change, a recalculation of the baseline has been conducted with retroactive impact for the years before 2021. Please see our Nuuday ESG Data Accounting Principles on our corporate website for an explanation of the calculations and boundaries of the data presented here.

ESG data (continued)

HR and occupational health & safety data

Employees by gender	2021	2020
Men (number)	2,688	2,945
Women (number)	1,223	1,337
Men (%)	69	69
Women (%)	31	31

Employees by contract type	2021	2020
Employees on permanent contracts - male (number)	2,677	2,934
Employees on permanent contracts - female (number)	1,207	1,330
Employees on temporary contracts - male (number)	11	11
Employees on temporary contracts - female (number)	16	7

Employees by employment type	2021	2020
Employees in full-time employment - male (number)	2,570	2,800
Employees in full-time employment - female (number)	1,111	1,212
Employees in part-time employment - male (number)	118	145
Employees in part-time employment - female (number)	112	125

Employees by age group	2021	2020
Employees aged under 30 (%)	37	37
Employees aged 30 - 50 (%)	44	45
Employees aged over 50 (%)	19	17

Employees by age group	2021	2020
Employees aged under 30 (number)	1,451	1,603
Employees aged 30 - 50 (number)	1,729	1,937
Employees aged over 50 (number)	731	742

Employees by employment category	2021	2020
Manager - male (number)	321	352
Manager - female (number)	74	77
Non-manager - male (number)	2,367	2,593
Non-manager - female (number)	1,149	1,260

Employees by employment category	2021	2020
Manager - male (%)	81	82
Manager - female (%)	19	18
Non-manager - male (%)	67	67
Non-manager - female (%)	33	33

Employee statistics - other	2021	2020
Fathers and non-birth mothers taking parental leave (%)	78	84
Different nationalities (number)	39	44
Age of oldest employee (years)	68	76
Age of youngest employee (years)	18	18

Please see our Nuuday ESG Data Accounting Principles on our corporate website for an explanation of the calculations and boundaries of the data presented here.

ESG data (continued)

HR and occupational health & safety data

Occupational health & safety (number)	2021	2020
Fatalities	0	0
With lost working time	8	13
Without lost working time	30	13
Total	38	26
Days of absence	216	87
Injury incidence (lost working time injuries per 10,000 employees)	20	30
Rate of fatalities (per 1,000,000 hours)	0	0
Rate of high consequence work-related injuries (per 1,000,000 hours)	1.24	1.9
Rate of work-related injuries (per 1,000,000 hours)	5.91	3.7
Rate of near-miss accidents (per 1,000,000 hours)	8.24	2.6

Gender representation - Board of Directors	Nuuday	TDC TELCO ApS
Men (number)	5	2
Women (number)	1	1
Total (number)	6	3
Men (%)	83	67
Women (%)	17	33

Other metrics	2021	2020
Whistleblower reports to Nuuday A/S Board of Directors		
Number of reports submitted to the whistleblower system (number)	0	1
EcoVadis score (number)	75	65
Digital citizenship: Coding Class / IoT at Folkeskolen		
Classes participated in Coding Class and IoT at Folkeskolen (number)	217	218
Children helped with acquiring digital skills through the Coding Class initiative since 2016 (number)	23,000	12,000
Customer engagement		
Donations made to Den Dansk Naturfond through the YouSee more initiative (Number)	25,831	26,043
Donations made to Børns Vilkår through the YouSee more programme (Number)	48,135	63,651
GDPR & security e-learning		
Employees completing GDPR e-learning (%)	91	92
Employees completing security e-learning (%)	51	62

Please see our Nuuday ESG Data Accounting Principles on our corporate website for an explanation of the calculations and boundaries of the data presented here.

Independent Auditor's Assurance Report

To the stakeholders of Nuuday A/S

We have reviewed the Nuuday Sustainability Report 2021 ("the Report"), which covers Nuuday's activities from 1 January to 31 December 2021, to provide limited assurance that the ESG performance data on pages 18-20 of the Report have been stated in accordance with the criteria defined by the accounting principles.

We express a conclusion providing limited assurance.

Management's responsibility

The Management of Nuuday A/S is responsible for collecting, analysing, aggregating and presenting the information in the Report and ESG data tables, ensuring that data are free from material misstatement, whether due to fraud or error. Nuuday's non-financial Accounting Principles for 2021 contain Management's defined reporting scope for each data type, which can be found on Nuuday's website: <https://nuuday.com/sustainability>.

Auditor's responsibility

Our responsibility is to express a limited assurance conclusion on whether the ESG performance data on pages 18-20 of the Report have been stated in

accordance with the criteria defined by the accounting principles. We have conducted our work in accordance with ISAE 3000 "Assurance Engagements Other than Audits or Reviews of Historical Financial Information" and additional requirements under Danish audit regulation to obtain limited assurance about our conclusion.

Deloitte Statsautoriseret Revisionspartnerselskab is subject to International Standard on Quality Control (ISQC) 1 and, accordingly, applies a comprehensive quality control system, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the requirements for independence and other ethical requirements of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, and ethical requirements applicable in Denmark.

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement. Consequently, the level of assurance obtained in a

limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Considering the risk of material misstatement, we planned and performed our work to obtain all information and explanations necessary to support our conclusion.

We performed our review from March 2022 to April 2022. Our work has included interviews with key functions in Nuuday A/S, inquiries regarding procedures and methods to ensure that selected ESG data and information have been incorporated in accordance with the accounting principles. As part of the work, we have assessed whether the process for reporting greenhouse gas emissions data complies with the principles of the Greenhouse Gas Protocol methodology as referred to in the accounting principles. We have assessed processes, tools, systems and controls for gathering, consolidating and aggregating ESG data at Group level, and performed analytical review procedures and tested ESG data prepared at Group level against underlying documentation. We have reviewed the reported ESG data as well as evaluated the reliability and validity of the underlying sources.

We have not performed site visits or interviewed external stakeholders, nor have we performed any assurance

procedures on baseline data or forward-looking statements such as targets and expectations. Consequently, we draw no conclusion on these statements.

Conclusion

Based on our work, nothing has come to our attention causing us to believe that the ESG data tables on pages 18-20 of the Nuuday Sustainability Report for the period from 1 January to 31 December 2021 have not been stated in accordance with the criteria mentioned in the accounting principles.

Copenhagen, 28 April 2022

Deloitte

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