

The background features the words "Do Good" in a large, stylized, rounded font. The word "Do" is in a light blue color, and "Good" is in a darker blue color. The letters are thick and have a playful, hand-drawn feel.

Nuuday Sustainability Report 2022

nuuday

Contents

Introduction	3	Diversity, equity, inclusion & belonging	13
Sustainability highlights	3	Our ambitions	13
Sustainability at Nuuday	5	2022 activities and performance	13
		Outlook for 2023	13
Combating climate change	7	Risk & Data	14
Our ambitions	7	ESG risks	14
2022 activities and performance	7	ESG data	15
Outlook for 2023	8		
Sustainable procurement & products	9	Independent auditor's assurance report	18
Our ambitions	9		
2022 activities and performance	9	Nuuday accounting principles for ESG reporting 2022	20
Outlook for 2023	9		
Children's digital life	10		
Our ambitions	10		
2022 activities and performance	10		
Outlook for 2023	10		
Responsible operations	11		
Our ambitions	11		
2022 activities and performance	12		
Outlook for 2023	12		

Children's digital lives
page 10



Combating climate change
page 7



Responsible operations
page 11





Sustainability highlights

In 2022, in close collaboration with our Board of Directors, we conducted a comprehensive materiality assessment and subsequently revised our sustainability strategy. It now reflects the status of Nuuday as an independent service provider operating separately from the former TDC Group. This revised sustainability strategy will guide our efforts in this domain going forward.

We began translating the revised strategy into action by joining the Joint Alliance for CSR (JAC), an association of telecom operators working to verify, assess and develop suppliers' sustainability implementation in the ICT industry. We also set out to explore new ways of reducing our consumption of single-use materials and expanding our take-back programme to include more devices.

Environmental and social agendas

In 2022, we continued our journey towards becoming one of the most sustainable telcos in the world, delivering on our ambitious climate agenda to become carbon neutral throughout our entire value chain before the end of this decade.

In recognition of our efforts, the leading rating agency EcoVadis awarded us a platinum score for the second consecutive year, rating us as a global top 1%

performer on sustainability. This will remain an underlying driver in 2023, as we work towards our first hard milestone on the climate change agenda by reducing Scopes 1 & 2 CO2 emissions by 50% on our way to becoming Scope 1 & 2 net-zero by 2028.

On the social agenda, we continued to support initiatives that strengthen children's digital skills and digital lives by prolonging our partnership with Børns Vilkår (Children's Welfare) to inspire, strengthen and support the role parents play in their children's digital lives. At the same time, we continued issuing technical and financial support to Børnetelefonen (Children's Helpline) and enhancing children's digital skills through our engagement in Girls' Day in Science and the Coding Class initiative.

Responding to external factors

Although not part of our strategic agenda – but rather in reaction to the outbreak of the tragic war in Ukraine – we spent considerable resources responding diligently to the situation. Initially, we focused mainly on providing physical security for our own contract agents in Ukraine and their families as well as providing free telephony traffic to and from Ukraine to help Ukrainians living in Denmark and Danes deployed in Ukraine.

This report covers Nuuday A/S' ESG performance and was prepared in accordance with sections 99a, 99b and 99d of the Danish Financial Statements Act. The statement covers the financial year 2022. It also serves as the foundation for our Communication on Progress submitted to the UN Global Compact, of which Nuuday is a proud member.

During the first months of the war, several initiatives were undertaken by Nuuday brands. YouSee offered devices to refugees in Denmark and clothing to refugees at the Polish border, while Relatel equipped buses from Ukraine with Wi-Fi. Meanwhile, TDC Erhverv set up equipment at schools converted into refugee centres.

In light of the Ukraine refugee situation, Nuuday relaunched TidsBanken - a concept that encourages employees who are regularly active in voluntary charity work to spend one day on charity work compensated by Nuuday.

As the war entered subsequent phases, and Ukrainian refugees began arriving in Denmark, Nuuday formed a joint industry initiative together with other Danish mobile service providers to hand out 20,000 SIM cards free of charge, allowing Ukrainian refugees in Denmark to contact friends and family and establish themselves in their new surroundings.

New programmes on inclusion and diversity

Internally at Nuuday, our key focus for the year was to further develop our programme on inclusive leadership and cognitive diversity, which is at the very core of our programme on diversity, equity, inclusion and belonging (DEIB). Fostering this more inclusive culture where colleagues thrive and feel they belong is a key in obtaining an improved and sustainable business performance.

In fact, 400 Nuuday leaders have received comprehensive training in this area during 2022. We also saw very high scores in our annual MyVoice survey on inclusion benchmarks, with the employees' score for feeling "able to be themselves" at work reaching 90/100, and "feeling valued" scoring 84/100.



Sustainability at Nuuday

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

Our approach

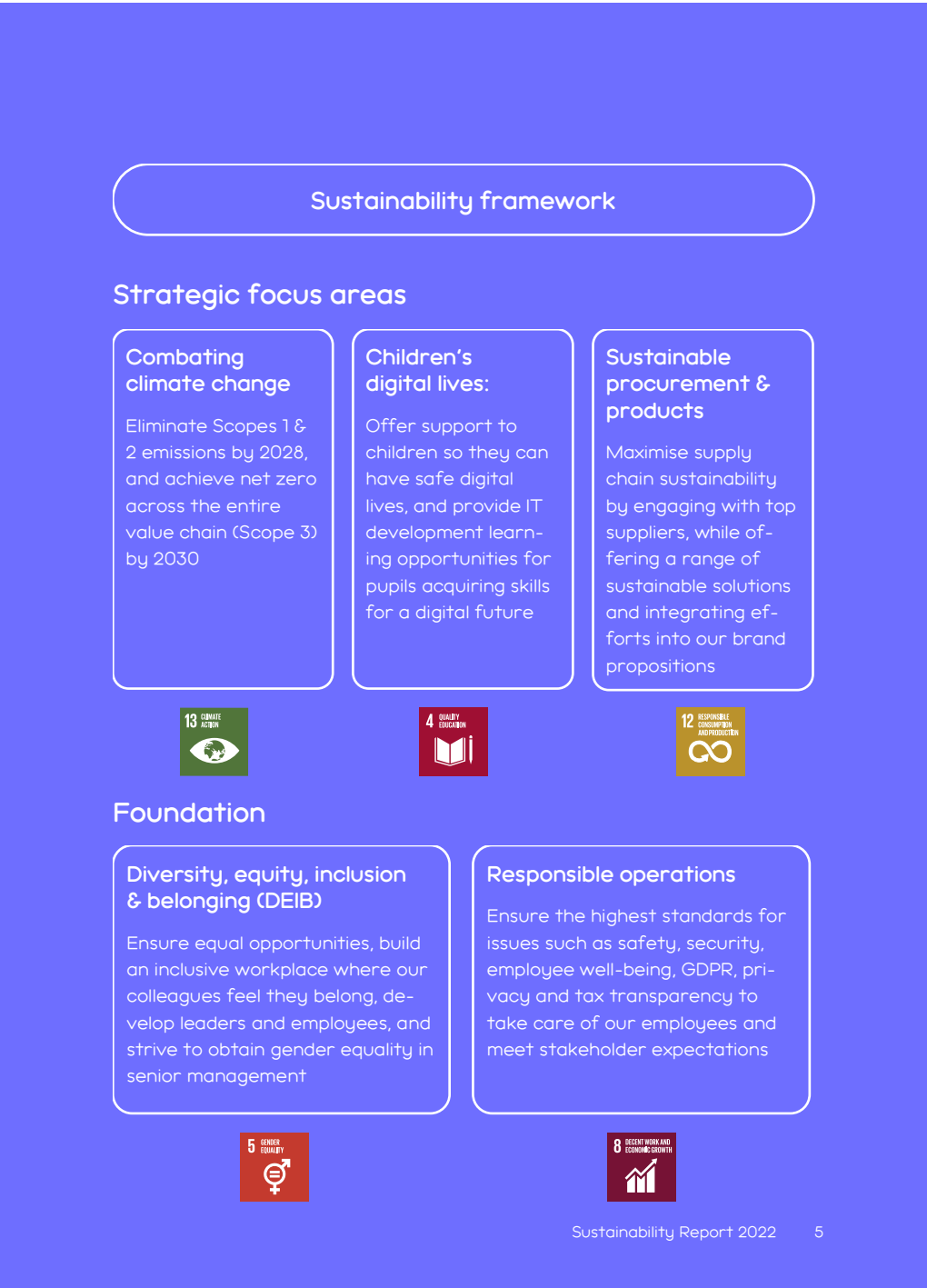
At Nuuday, we are committed to running our business in a responsible and sustainable manner, as we believe this is both vital for the long-term sustainability of our business and a necessity for existing and competing in modern society.

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.

Our sustainability framework

Nuuday’s sustainability strategy is centered on three key pillars: Combating climate change, children’s digital lives and sustainable procurement & products. These pillars stand on a foundation of responsible operations and diversity, equity, inclusion, and belonging (DEIB) that are deeply engrained in the way Nuuday operates its business internally.

We are committed to the UN Sustainable Development Goals and have aligned our sustainability strategy with the goals, namely Quality Education (SDG #4), Gender Equality (SDG #5), Decent Work & Economic Growth (SDG #8), Responsible Consumption and Production (SDG #12) and Climate Action (SDG #13).



Governance

Our executive management is responsible for ensuring that our targets are achieved, and our strategy and policies are translated into activities that drive tangible progress. Nuuday's Board of Directors is overseeing the sustainability work and receives regular update reports. The Board also conducts a thorough assessment of the strategy, progress and supporting policies every year.

At 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 coordinating with multiple external and internal stakeholders, not least colleagues in Procurement, Legal, Finance and HR who are responsible for individual issue-specific domains covering data protection, privacy and data ethics, anti-corruption, IT security and other ESG 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 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.



Combating climate change

Despite rising demand for digital connectivity, increasing energy consumption and carbon emissions, the overall effect of the telco industry is one of enablement, as digital technologies can deliver significant carbon reductions since high-speed connectivity replaces physical travel, transport and some aspects of physical production.

However, connectivity is not without environmental costs. Our products 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 actively engages in the climate and environment agenda.

Our ambitions

To address our own negative climate impact, we have set an ambitious target to reach net zero in Scopes 1 & 2 (removing emissions from Nuuday-owned sources and the purchase of electricity and

heat) by 2028, including a medium-term 50% reduction target by the end of 2023.

Further, we are aiming for Scope 3 net zero (emissions throughout the entire value chain from activities not owned by Nuuday) by 2030.

2022 activities and performance

In November 2022, the third of four newly erected solar parks, that we have contracted through TDC NET, opened its

doors, providing us with a larger share of sustainable power and bringing net zero in Scopes 1 & 2 a huge step closer. This key initiative will be a major enabler for us to reach our medium-term target in 2023.

Also together with TDC NET, we launched a pilot project to begin transitioning our fleet away from fossil fuels by exploring alternative options. This project will now form the basis for a decision in 2023 on how and when to convert our car fleet to renewable alternatives.

Energy and own emissions

In 2022, we reported a 3.7% increase in our operational CO₂e emissions (Scopes 1 and 2) compared with the previous year. This was driven by an increase in transportation mainly due to employees returning to office after COVID-lockdowns in 2021.

Our CO₂ emissions from electricity is declining as we are sourcing electricity from the newly established solar parks from where we estimate zero emissions.



Scope 3 emissions

In 2022, we updated our Scope 3 model to include the emissions from network operators, but it has not been possible to recalculate previous years. Therefore, we have now chosen 2022 as the new base line year for carbon emissions calculations.

The major change in 2022 Scope 3 emissions is employee commuting. Again, we have now been through a full year of almost no lock-down, and thus an increase in emissions from commuting was expected.

The updated inventory shows that our Scope 3 emissions accounts for more than 98% of total emissions. Going forward, we will therefore continue to intensify dialogue with key suppliers to jointly reduce Scope 3 emissions.

Resource management

In 2022, we recycled 51% of our waste – a decrease of 0.4 percentage points compared with 2021. A total of 42% of our waste went to energy recovery (incineration), and less than 0.62% ended in landfills. Our focus on waste in our operations will continue as we maintain efforts to further improve our recycling rates.

We also continued working on reducing the lifecycle impact of our customer premises equipment by promoting circular processes through refurbishment and reuse. In 2022, we refurbished 180,336 units and thus obtained a refurbishment rate of 36% of all units. This achievement avoided 71.6 metric tons of e-waste in 2022, thereby reducing the need to

manufacture new customer premises equipment.

Outlook for 2023

Having set out on our short-, medium-, and long-term carbon emissions reduction journey, in 2023, we will concentrate on delivering improved results. In 2023, we will receive renewable electricity from one additional solar park, thereby reducing CO₂ emissions and delivering on our short-term 50% emissions reduction target for Scopes 1 and 2 by the end of 2023.

For Scope 3, we will continue engaging with key suppliers to influence their strategic orientation and reduce Scope 3 emissions, and on that basis discuss progress with the Board of Directors.



Sustainable procurement & products

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. 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.

At Nuuday, we strive to join the circular economy where possible. We offer our customers take-back programmes to ensure circulation of IT equipment materials, we source from suppliers that vow to

honour the ten principles of the UN Global Compact, and we are determined to reduce single-use materials in our production.

Our ambitions

We aim to maximise supply chain sustainability by engaging with top suppliers and making sure that they are able to document their commitments and performances in alignment with the ten principles of the UN Global Compact. This supports our Scope 3 ambition to alleviate climate change.

We also aim to ensure that we are in alignment with customer needs and preferences, providing sustainable alternatives and perpetually mainstreaming the sustainable solutions.

2022 activities and performance

In 2022, we strengthened our engagement in influencing our suppliers' product development and strategic orientation on sustainability via Requests for Proposals and contract processes, but also at a more general level. To accelerate this work, we joined JAC – the Joint Alliance for CSR – to verify, assess and develop sustainability implementation by suppliers to the ICT industry.

In the field of product refurbishment, our consumer business contracted with



Foxway, which enables circular tech by offering takeback, refurbishment and materials recycling programmes. This complemented our existing B2B collaboration with 3SteplT, offering similar solutions.

One initiative launched in 2022 to integrate more sustainable materials in our product portfolio featured our new DOCSIS 4.0 technology router, made from recycled plastics. Another launch, involving the new TV & streaming offering YouSee Play, enables customers to deselect the set-top box, thereby securing tangible production and consumption savings.

Outlook for 2023

Based on our JAC membership, during 2023 we will conduct a series of onsite audits of our key suppliers. By tapping into JAC's joint auditing pool, we will also ensure that our suppliers and our industry meet high sustainability standards.

With annual spend data in mind, we will develop a new self-assessment tool to send out to main suppliers as well as all new suppliers contracting with Nuuday.

During 2023, we will develop a Nuuday strategy for reducing use of single-use materials, and we have new innovations in the pipeline that will further accelerate our box-less entertainment endeavours. At the same time, we will explore new ways of optimising content transcoding, thereby saving some 10-20% of energy consumption in that part of the value chain.



Children's digital lives

Through partnerships and activities, we maintain a responsible approach to children's exposure to digital communication, and we take responsibility for providing children with the digital skills for the future.



Our ambitions

We want to equip children for enjoying safe digital lives. Through our longstanding partnership with Børns Vilkår (Children's Welfare), we empower schools, children and parents in their daily digital lives, and our B2B brand TDC Erhverv provides free technical services plus donations that ensure Børnetelefonen (Children's Helpline) has voluntary counsellors trained to offer the help and guidance needed by children and adolescents calling the hotline.

We also want to provide IT development learning opportunities for pupils acquiring skills for a digital future. Through

active participation in the initiatives Coding Class and Girls' Day in Science, we help future generations to gain a basic understanding of the digital foundation on which our society is built, while introducing the concepts of coding and programming.

2022 activities and performance

Digital skills

Coding Classes introduce pupils to computer programming, and sixth graders learn to innovate and create digital solutions for real, everyday challenges.

For the seventh time, we had the pleasure of welcoming pupils from Sankt Annæ Gymnasium into our Copenhagen offices, where together we brainstormed programming-based solutions and ideas with YouSee. During the month leading up to the visit, the pupils had worked on using IT and technology to develop solutions to real-world challenges. Since we launched the Coding Class in 2016, 31,624 pupils have had their digital skills enhanced thanks to this initiative.

Again in 2022, Nuuday hosted Girls' Day in Science, which invites a group of

young women in upper secondary school to visit us for talks about careers, education, and jobs within IT. They had the opportunity to try working on concrete tasks about "designing the future self-service universe" while meeting some of our cool female role models.

Together with the Center for Digital Pædagogik, Story House Egmont and the Telecoms Industry Association (TI), we produced a special printed edition of Donald Duck 'Anders And & Co – Online med Anders'. This magazine teaches children to cope with the digital world in a sensible, healthy and safe way, while helping parents to engage in a good and safe conversation with their children about digital life and using the internet safely. The magazine was made available online and also handed out in YouSee's 40 stores free of charge.

Safe digital lives

Together with Børns Vilkår, we developed a guiding universe for Danish parents, and a new digital tool, 'The Family Screen Check' in 2021. It tests parents as digital role models and provides insights on how screens affect everyday life. In 2022, we continued this partnership to inspire, strengthen and support the role parents play in their children's digital lives, and prolonged our collaboration into 2023.

In 2022, Børnetelefonen celebrated its 45th birthday. Via assistance from



Nuuday's brand TDC Erhverv, in 2022, Børnetelefonen effectuated 60,450 counselling sessions with children and youngsters, as well as more than 5,000 with adults.

In addition, TDC Erhverv's bicycle network collected money for Børns Vilkår, thereby enabling even more children to connect safely and anonymously with the organisation's volunteers. Nuuday also invited employees and guests to hand in used mobile phones for refurbishment or recycling and the money generated from devices was donated to Børns Vilkår.

Outlook for 2023

In 2023, we will continue pursuing meaningful partnerships and collaboration options to deliver on our commitment to encouraging children to enjoy safe digital lives. This will include a new partnership with Red Barnet (Save the Children) that we entered in early 2023 supporting their campaign on preventing digital offences and helping provide safe digital spaces for children.

Responsible operations

In line with the UN Global Compact principles, we follow a suite of policies and procedures that are all publicly available at [Nuuday.com/sustainability](https://nuuday.com/sustainability) and include e.g. our whistleblower policy, anti-bribery and corruption policy, data ethics policy, data privacy policy and partner code of conduct including our approach on human and labour rights. Through distinct programmes, we strive to run our company in a responsible manner with suppliers, employees and stakeholders.

We aim to ensure the highest standards in a range of fields, spanning from health & safety to security and data ethics, to take care of our employees while meeting stakeholder expectations. We also have three ISO certifications across our business, covering environmental management (ISO 14001), occupational health and safety (ISO 45001), and IT security (ISO 27001).



Nuuday is a proud member of selected organisations through which we engage in ESG dialogues. In addition to the Global Compact and the Joint Alliance for CSR (JAC) already mentioned, we are members of the Telecoms Industry

Association (TI), the Danish Chamber of Commerce (Dansk Erhverv), Danske Mediedistributører (DMD), the Danish ICT Industry Association (IT-Branchen) and ElRetur.



Our ambition

Health and safety

Our health and safety strategy focuses on developing a preventive culture to mitigate and reduce negative effects on the physical and psychological work environment. To ensure we understand our employees' sentiments, awareness and knowledge, we regularly survey our people and run trainings sessions.

Human rights and anti-corruption

We firmly denounce bribery or corruption and do not accept or tolerate corruption in any form. Also we believe that human rights are inalienable, and we insist that suppliers to Nuuday must respect basic rights.

To ensure proper conduct of employees and partners, we have developed and promoted an anti-bribery and corruption policy that guides internal behaviours as well as a partner code of conduct that suppliers and partners must obey with regards to anti-bribery and corruption and respect for human rights.

Digital trust and data ethics

With our strong and uncompromising focus on data privacy, at Nuuday we consistently empower more colleagues to work with data, guided by data ethics as a moral compass for everyday tasks and assignments that extend beyond

regulation. Our full policy on data ethics is available at <https://nuuday.com/sustainability>.

Security

Nuuday's security work encompasses information security, including IT security as well as physical security. We operate with a risk-based approach to protect our company, our customers, our employees and citizens at large.



2022 activities and performance

Health & Safety

Two Nuuday pilot projects in 2022 highlighted increasing the psychological resilience among our youngest call-centre employees: 'Looking after You & Me' with a cultural analysis and nine clear recommendations for the call-centre management, and 'Stress prevention skills' to create new perspectives and perceptions when under pressure.

A driving course, 'Preventive driving', was offered to Nuuday employees with company cars – one-third participated. In 2022, we were also recertified to hold the ISO 45001 (international Health & Safety certification) and the Crown Smiley (Danish Health & Safety Authorities' certification).

Human rights and anti-corruption

In 2022, we received no reports on violations of human rights or our anti-corruption policy.

Digital trust and data ethics

In 2022, Nuuday's Artificial Intelligence (AI) team established a common process for AI development that counteracts unconscious bias. We have set up a general AI platform and will migrate all AI initiatives there that are not embedded in a system. The platform enables transparent AI programmes as well as logging all AI activities.

We held a series of workshops to draft data ethics guidelines and a model for weighting key elements. The participants discussed how to draw on data ethics cases in everyday work and the insight

generated will be further conceptualised.

Security

In 2022, Nuuday reorganised its work practices to better support the "three lines of defence model" from The Institute of Internal Auditors. Now, operational security functions (the 1st line of defence) are separate from security governance, compliance, fraud and risk functions (the 2nd line of defence) at Nuuday.

We also completed a project related to identifying and analysing the security risks to, and compliance with, internal security controls for all assets underpinning critical customer services at Nuuday. Using recently published versions of both ISO 27001 and ISO 27002, we also updated Nuuday's security policy and standards.

Outlook for 2023

Health and safety

In health and safety, we plan on changing the health & safety organisation to leave H&S groups free to plan and act according to local and specific needs.

We will again be offering the course 'Preventive driving', and the stress prevention pilot course will continue into Q1. From that point onwards, we will offer learning points and materials to the rest of Nuuday. We also expect to introduce a campaign to prevent spare-time drug and alcohol abuse among our employees.

Human rights and anti-corruption

In 2023, we are expanding our work on supplier due diligence with more

assessments on anti-corruption and human rights compliance.

Digital trust and data ethics

In the field of digital trust and data ethics, we will work to conceptualise data ethics across Nuuday, including non-IT related roles, by embedding this topic in the current data privacy process – already a familiar digital tool for our employees.

Security

In security, in 2023 we will highlight security awareness training for all employees, including regular phishing tests,

while aiming to integrate security risk management in Nuuday's overall enterprise risk management organisation. Other updating initiatives in 2023 will focus on our Information Security Management System meeting the requirements of both the Centre for Cyber Security and the recently published NIS2 EU directive, as well as mitigating fraud and minimising the likelihood and impact of security incidents.



Diversity, equity, inclusion & belonging (DEIB)

At Nuuday, our diversity, equity, inclusion & belonging (DEIB) aspirations are anchored in four pillars: we care to do better for our society, our customers, our workplace and our people. These pillars guide our approach and support the integration of DEIB in our culture, leadership and core people processes.

Our ambition

At Nuuday, we pride ourselves on our diversity, believing that cognitive diversity is key to an improved and sustainable business performance. We see inclusion as a powerful driver for innovation and growth that promotes the creativity and inspiration required to successfully transform our company. We strive to create an inclusive culture where diversity can flourish.

2022 activities and performance

In 2022, close to 400 leaders participated in mandatory training on how to lead with inclusion and cognitive diversity. Today, new tools and approaches have become integral in our ways of working, contributing to better decisions and timely actions. Our Q4 engagement survey, for example, revealed very high scores on perceived levels of psychological safety, which is critical for fostering the inclusion and innovation that leads to healthier, more productive and more inclusive teams.

We have made pleasing progress in 2022 in terms of gender diversity in management. 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. In 2022, we reached 23% women in management, up from 19% at the end of 2021, reflecting progress as planned towards reaching 30% women in management in 2025.

The gender composition of the board in terms of members elected by the General Meeting was 66.67% male and 33.33% female on 31 December 2022. The Board of Directors therefore achieved its objective that among board members elected by the General Meeting, both genders shall be represented by at least 33% by the end of 2023. Nuuday's subsidiary, TDC TELCO ApS, with two male and one female member of the Board of Directors also accomplished this gender balance target.

Outlook for 2023

In 2023, we will further embed many of the new practices from leader training courses to support our DEIB agenda at Nuuday. For example, all newly recruited or promoted leaders will participate in training dedicated to leading with inclusion and cognitive diversity.

In response to the new stricter requirements for targets and policies for the underrepresented gender outlined in the Danish Companies Act, we will seek approval from the Board of Directors for our new policy in this domain.



ESG risks

Risk & trend	Risk domain	Details & impact	Mitigation initiatives
Human rights Stable >	Image, PR & Public Affairs / Legal & Compliance	<p>Nuuday has responsibility for our direct employees, 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>If Nuuday or Nuuday partners violate fundamental human rights, this may lead to legal action as well as bad publicity and customer reactions negatively impacting Nuuday.</p>	<ul style="list-style-type: none"> • Procedures and policies & partner code of conduct • Based on a thorough risk assessment, we conduct audits at our suppliers each year, particularly screening for adherence to the UN Global Compact Assessment • Industry collaboration through JAC – the Joint Alliance for CSR
Anti-corruption and bribery Stable >	Image, PR & Public Affairs / Legal & Compliance	<p>Nuuday is a large employer in Denmark with suppliers across the globe. With multiple contract relationships there is always a risk that bribery or corrupt practices could occur, influencing business decisions.</p> <p>If corruption or bribery occurs, it may lead to legal action as well as bad publicity and customer reactions negatively impacting Nuuday.</p>	<ul style="list-style-type: none"> • Anti-corruption policy commits Nuuday to complying with the UN Convention against Corruption • Raising awareness and putting in place resources and training for employees • Whistleblower policy that allows for the anonymous reporting of suspected wrongdoings at the company • Partner Code of Conduct for suppliers, partner organisations and employees
Environment and climate Stable >	Image, PR & Public Affairs / Legal & Compliance	<p>Several potential environmental and climate risks may be linked to our operations and supply chain. Nuuday has a responsibility to try to reduce our own resource consumption, emissions and waste in production and to influence partners and suppliers to act equally responsibly.</p> <p>If Nuuday does not show credible action on environment and climate matters, it may generate bad publicity and customer reactions negatively impacting Nuuday.</p>	<ul style="list-style-type: none"> • Nuuday has set ambitious carbon emissions reduction targets for Scopes 1, 2 & 3 • ISO 14001 certification covering our whole operation • Detailed ESG reporting on climate and environment metrics • Nuuday has embarked on a revised sustainability strategy with sustainable procurement and products as a key pillar • Nuuday aims to retain an Ecovadis platinum rating as a token of recognition that Nuuday is a leader in sustainability
Social and employees Stable >	Human Resources / Health & Safety	<p>Nuuday focuses on retaining the services of its key personnel and invests in attracting suitable and qualified talents to ensure a good working environment e.g., with no accidents or stress incidents. Nuuday's success depends largely on our ability to attract and retain key personnel. The competition for qualified personnel is intense and with limited availability of candidates with the required knowledge of the telecoms industry and relevant experience in Denmark.</p>	<ul style="list-style-type: none"> • 88% of employees are covered by collective agreements • Occupational health and safety policy and certification to ISO 45001 standard • Flexible working conditions. • Quarterly employee engagement surveys • Diversity, equity, inclusion & belonging (DEIB) Policy

ESG data

Environmental data

Energy & emissions	2022	2021	2020
Electricity (GWh)	8.4	6.8	6.9
Heat (GWh)	10.1	10.9	11.3
Transport (GWh)	6.9	6.8	6.8
Total energy consumption (GWh)	25.4	24.5	24.9
2022 new baseline			
Scope 1 (metric tons CO ₂ e)	1,761	1,620	1,643
Scope 2 location-based (metric tons CO ₂ e)**	1,173	1,325	1,369
Scope 2 market-based (metric tons CO ₂ e)**	3,224	3,186	3,124
Scope 3 (metric tons CO ₂ e)	274,413	*) -----	*)-----
Total Scopes 1, 2 & 3 market-based emissions (metric tons CO₂e)	279,398	-----	-----

*) New calculation model for Scope 3 in 2022, as network distribution is now included in category 1 – Purchased goods and service.

**) Recalculation of minor parts in Scopes 1 and 2 for 2020 and 2021, so numbers deviate slightly from previous ESG reports.

Waste	2022	2021
Non-hazardous – landfill (metric tons)	3.6	10.98
Non-hazardous – composting (metric tons)	31.29	19.75
Non-hazardous – recycling (metric tons)	287.21	303.45
Non-hazardous – energy recovery & incineration (metric tons)	250.88	270.88
Total non-hazardous waste (metric tons)	572.98	605.05
Hazardous – landfill (metric tons)	0.01	0.04
Hazardous – composting (metric tons)	0	0
Hazardous – recycling (metric tons)	10.56	16.12
Hazardous – energy recovery & incineration (metric tons)	0.35	0.1
Hazardous – other, incl. recycling and energy recovery (metric tons)	0	0
Total hazardous waste (metric tons)	10.92	16.26
Total waste disposed of (metric tons)	583.9	621.32
Waste recycled (%)	51.0	51.4

Scope 3 by category	2022	2021	2020
1: Purchased goods and services & 2: Capital goods (metric tons of CO ₂ e)	243,784	-----	-----
3: Fuel and energy-related activities (metric tons of CO ₂ e)	1,146	1,133	900
4: Upstream transportation and distribution (metric tons of CO ₂ e)	4	44	158
5: Waste generated by operations (metric tons of CO ₂ e)	13	14	36
6: Business travel (metric tons of CO ₂ e)	381	168	158
7: Employee commuting (metric tons of CO ₂ e)	3,678	1,039	1,069
11: Use of sold products (Direct) (metric tons of CO ₂ e)	25,395	26,654	22,460
12: End-of-life treatment of sold products (metric tons of CO ₂ e)	13	30	53
Total Scope 3 emissions (metric tons of CO₂e)	274,413	*)-----	*)-----

Customer product refurbishment	2022	2021
Refurbished CPEs (number)	180,336	179,672
Percentage refurbished of total units (%)	36	41
Avoided e-waste (metric tons)	71.6	75.4

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.

ESG data (continued)

HR and occupational health & safety data

Employees by gender	2022	2021
Men (number)	2,645	2,688
Women (number)	1,199	1,223
Men (%)	69	69
Women (%)	31	31

Employees by contract type	2022	2021
Employees on permanent contracts - male (number)	2,632	2,677
Employees on permanent contracts - female (number)	1,192	1,207
Employees on temporary contracts - male (number)	13	11
Employees on temporary contracts - female (number)	7	16

Employees by employment type	2022	2021
Employees in full-time employment - male (number)	2,529	2,570
Employees in full-time employment - female (number)	1,092	1,111
Employees in part-time employment - male (number)	116	118
Employees in part-time employment - female (number)	107	112

Employees by age group	2022	2021
Employees aged under 30 (%)	38	37
Employees aged 30-50 (%)	41	44
Employees aged over 50 (%)	21	19

Employees by age group	2022	2021
Employees aged under 30 (number)	1,452	1,451
Employees aged 30-50 (number)	1,590	1,729
Employees aged over 50 (number)	802	731

Employees by employment category	2022	2021
Managers - male (number)	298	321
Managers - female (number)	91	74
Non-managers - male (number)	2,347	2,367
Non-managers - female (number)	1,108	1,149

Employees by employment category	2022	2021
Managers - male (%)	77	81
Managers - female (%)	23	19
Non-managers - male (%)	68	67
Non-managers - female (%)	32	33

Employee statistics - other	2022	2021
Fathers and non-birth mothers taking parental leave (%)	82	78
Different nationalities (number)	40	39
Age of oldest employee (years)	69	68
Age of youngest employee (years)	17	18

ESG data (continued)

HR and occupational health & safety data

Occupational health & safety (number)	2022	2021
Fatalities	0	0
With lost working time	13	8
Without lost working time	34	30
Total	47	38
Days of absence	151	216
Injury incidence (lost working time injuries per 10,000 employees)	13	20
Rate of fatalities (per 1,000,000 hours)	0	0
Rate of high consequence work-related injuries (per 1,000,000 hours)	0.57	1.24
Rate of work-related injuries (per 1,000,000 hours)	7.5	5.91
Rate of near-miss accidents (per 1,000,000 hours)	5.36	8.24

Gender representation - Board of Directors	Nuuday	TDC TELCO ApS
Men (number)	4	2
Women (number)	2	1
Total (number)	6	3
Men (%)	67	67
Women (%)	33	33

Other metrics	2022	2021
Whistle blower reports to Nuuday A/S Board of Directors		
Number of reports submitted to the whistle blower system (number)	2	0
EcoVadis score (number)	75	75
Digital citizenship: Coding Class / IoT at Folkeskolen		
Classes participated in Coding Class and IoT at Folkeskolen (number)	221	217
Children helped with acquiring digital skills through the Coding Class initiative since 2016 (number)	31,624	23,000
GDPR & security e-learning		
Employees completing GDPR e-learning (%)	65	91
Employees completing security e-learning (%)	32	51

The Nuuday ESG Data Accounting Principles on our corporate website explain the calculations and boundaries of the data presented here.

Independent auditor's assurance report on Nuuday sustainability report 2022

To Management and broader stakeholders of Nuuday A/S

Nuuday A/S engaged us to provide limited assurance on the ESG performance data for the year ended 31 December 2022, presented on pages 15-17 in Nuuday Sustainability Report 2022 ("the Report").

Management's responsibility

Management of Nuuday A/S is responsible for designing, implementing, and maintaining internal controls over information relevant to the preparation of the ESG performance data and information in the Report, ensuring they are free from material misstatement, whether due to fraud or error. Furthermore, Management is responsible for establishing objective accounting principles ("Accounting principles") for the preparation of ESG performance data, for the overall content of the Report, and for measuring and reporting ESG performance data in accordance with the Accounting principles stated on pages 15-17 of the Report.

Auditor's responsibility

Our responsibility is to express a limited assurance conclusion based on our engagement with Management and in accordance with the agreed scope of work. We have conducted our work in accordance with ISAE 3000 (Revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information, and ISAE 3410 Assurance Engagements on Greenhouse Gas Statements, and additional requirements under Danish audit regulation, to obtain limited assurance about our conclusion. Greenhouse Gas emissions quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emission factors and the values needed to combine emissions of different gasses.

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the ESG performance data are free from material misstatement, whether due to fraud or error, and prepared, in all material respects, in accordance with the Accounting principles;
- forming an independent conclusion, based on the procedures we performed and the evidence we obtained; and

- reporting our conclusion to the Management and broader stakeholders of Nuuday A/S.

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.

Work performed

We are required to plan and perform our work in order to consider the risk of material misstatement in the ESG performance data. To do so, we have:

- conducted interviews with data owners and internal stakeholders to understand the key processes and control activities for measuring, recording and reporting the ESG performance data;
- performed limited substantive testing on a selective basis to check that data has been appropriately measured, recorded, collated and reported;
- performed analysis of data, selected based on risk and materiality;
- made inquiries regarding significant developments in the reported data;
- considered the presentation and disclosure of the ESG performance data;
- assessed that the process for reporting greenhouse gas emissions data follows the principles of relevance, completeness, consistency, transparency and accuracy outlined in The Greenhouse Gas Protocol Corporate Standard Revised edition (2015);
- evaluated the evidence obtained

Our conclusion

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us not to believe that the ESG performance data on pages 15-17 in Nuuday Sustainability Report 2022 for the year ended 31 December 2022, has been prepared, in all material respects, in accordance with the accounting principles.

Copenhagen, 31 March 2023

Deloitte

Statsautoriseret
Revisionspartnerselskab
Business Registration No. 33 96 35 56

Lars Siggaard Hansen
State Authorised Public Accountant
MNE no 32208

Marie Voldby
Lead Reviewer

Nuuday accounting principles for ESG reporting 2022

Overview

The Nuuday non-financial accounting principles set out the criteria, assumptions and principles upon which we calculate our non-financial environmental, social & governance data, including our energy consumption, greenhouse gas emissions, waste, and employee data.

The ESG data is published in our Annual Report and our Sustainability Report. Where possible, the ESG performance data includes all brands within the Nuuday family.

The data reported covers the time period from 1st of January 2022 to 31st of December 2022.

Accuracy, Completeness & Estimations

We do our best to ensure that the activity data we collect is complete and based on actual data, e.g. invoices, meters, fuel cards. If this is not possible, we rely on estimations. Following the split of TDC Group into Nuuday and the dissolution of TDC Group all the remaining emissions associated from TDC Group (below 5% in 2021) are assigned to Nuuday for completeness purposes.

For input data for the energy consumption that is not split between TDC Group, TDC NET and Nuuday, we use a distribution key to allocate the part of the consumption from each of the different companies. The distribution keys are also corrected historically for comparability and completeness purposes as the updated numbers are considered more accurate for the actual split of the company.

Environmental Data Reporting Boundaries

CO₂e emissions calculation methodology

In order to calculate our CO₂e emissions, we collect activity data, e.g. litres of gasoline and diesel consumed by our technicians in their vans and GWh of electricity purchased across our operations on an annual basis.

This data is sourced from:

- Fuel data: Only data from company fuel cards, as these cards should be used for 100% of fuel purchased.
- Electricity: Consumption is measured directly from ~15,000 meters across our sites.
- Oil, natural gas, district heating: Taken directly from supplier invoices as volume or cost.

We use fuel conversion factors to convert our fuels into kWh. For petrol, diesel, oil and natural gas, we use the official UK government / DEFRA fuel conversion factors. These factors are updated on an annual basis, according to the newest published factors from DEFRA.

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

To calculate emissions, we apply specific conversion factors to our activity data. We use emission factors from our suppliers, from Energinet and from DEFRA (*Department for Environment, Food & Rural Affairs (2022) – UK Government GHG Emission Conversion Factors for Company Reporting*) to translate this

activity data into CO₂ and greenhouse gas (GHG) or CO₂e emissions.

For location-based emission factors there is significant time lag between our publication and the issuance of the correct factor for the given year. In our reporting we use the latest available emission factors.

Scope 3 Emissions Reporting

Nine of the fifteen Scope 3 categories have been found to be relevant for our business. In 2020, we performed our first Scope 3 inventory and reported for 2019 and 2020.

In 2022 we are including emissions from net distributors in our scope 3, category 1. Since we cannot recalculate previous years (TDC Group was one company with own net distribution), we have now chosen 2022 as new base line year.

In 2021, a series of minor methodological changes were made, and the 2019 and 2020 figures were updated retrospectively. These included:

The allocation of TDC Group emissions to either TDC NET or Nuuday. This was done using an allocation key based on the number of employees post-split. The exception is certain select category 1&2 emissions that were allocated to TDC NET.

Upstream transportation now accounts for only emissions that result from transportation emissions from suppliers that we purchase services from directly.

For employee commuting, only Nuuday employees were considered.

Category 1: Purchased Goods and Services & Category 2: CAPEX

These two categories are reported together. There are two different methodologies to calculate emissions depending on availability of data. They range from most to least accurate:

Financial Allocation Method: If the transparency of supplier data for scopes 1, 2 and 3 is 'sufficient', then we calculate our share of their emission by using the following formula:

$\text{TDC Spend} / \text{Supplier Revenue} * \text{Supplier Footprint}$

There is a threshold for what is considered 'sufficient', where the supplier must:

- Publish scope 1 emissions
- Publish preferably, market-based Scope 2 emissions but location based used otherwise
- Have a full Scope 3 inventory for upstream emissions, with a minimum of purchased goods and services reported publicly
- Be on the CDP A-List AND/OR have an approved Science Based Target according to the SBTi

The suppliers meeting the above criteria were slightly higher in 2022 compared to previous years reflecting more accurate emissions. The 'sufficiency' criteria are expected to be updated every 3 years and the suppliers adjusted accordingly. Average annual exchange rates are used and most recent available 12-month data from each supplier.

Environmentally Extended Input Output Method: If suppliers' scopes 1, 2 and 3 data is insufficient, then we estimate the footprint using EEIO modelling, based on the "Open Input Output Model" (2011) from the Sustainability

Consortium, University of Arkansas. The EEO emission factors have been updated by Carbon Trust to 2021 values reflecting adjustments in relation to inflation and global improvements in technology and have in 2022 been updated with regards to inflation.

Category 3: Fuel and Energy Related Activities

To calculate these emissions, we use activity data from scope 1 and market-based scope 2. Emission factors are taken from DEFRA (Department for Environment, Food & Rural Affairs (2022) – UK Government GHG Emission Conversion Factors for Company Reporting). Emission factors for transmission and distribution (T&D), well-to-tank (WTT) and T&D WTT for electricity have been calculated using the published methodology from DEFRA 2022 and electricity net loss reported by Energinet.

Category 4: Upstream transportation

All transportation is accounted for in this category as we source the transportation. We use actual activity data provided by our transportation suppliers.

Category 5: Waste

We use supplier specific tonnage for all waste for TDC Group for which Nuuday accounts for a certain percentage of waste based on number of employees. We use emission factors from DEFRA (Department for Environment, Food & Rural Affairs (2021) – UK Government GHG Emission Conversion Factors for Company Reporting) to translate this activity data into CO₂ equivalent emissions.

Category 6: Business travel

Air: Use supplier specific data on km travelled on short, medium, long-haul, business and economy, with DEFRA emission factors (2022)

Hotel: Use nights spent in each country and the DEFRA emission factor. Where DEFRA emission factors have not been available emission factors from Green View (hotel footprints) have been used.

Rental cars: Use of spent data and assumption on percentage of spend related to fuel. Fuel

has been assumed to be 50/50 split of petrol and diesel.

Taxi: Use invoice data and DEFRA emission factor for taxis.

Public transport: Use invoice data and supplier specific emission factor for InterCity trains from DSB (spend/revenue*CO₂ footprint of Danske Statsbaner (DSB).

Sea travel: Use of supplier specific emission factor from Molslinjen and assumption of weight related to one ferry crossing of a Nuuday employee.

Category 7: Employee commuting

In 2020, we conducted a survey of employees where we got detailed responses on the pre-corona commuting habits from 262 Nuuday employees. Based on this information, we have modelled the relative distribution in choice of transportation type for commuting of our employees in three regions (Sjælland, Fyn and Jylland) and calculated average transportation distances of the different transportation types of our employees per region. We use average office occupancy rates of the reporting year from facility management to address commuting days per week and remote working days per week. For commuting days, we use most recent transportation-specific emission factors from DSB, Movia, Metroselskabet and DEFRA. For remote working days we use an emission factor from a Carbon Trust study for average daily remote-working emissions.

Category 11: Use of Sold Products

This category includes direct emissions from use of leased customer premise equipment and equipment sold to customers. Indirect use emissions from sold and leased products are not included. We have calculated the lifetime power consumption for use of most of our product categories, including modems, WIFI extenders, Set-Top Boxes, mobile phones, tablets, laptops, business telephones and networking equipment. We have estimated the lifetime power consumption of the individual product categories based on the wattage usage of

specific products and taking into account sleep function where relevant. To calculate the lifetime of the device, we make type specific assumptions, and for Customer Premise Equipment, we include customer churn rate. Using the power consumption generated from the exercise, we calculate emissions using the most recent grid emission factor from the Danish Energy Agency. Around 2,5% of our sold and leased products are excluded due to lack of data. Around 23% of our sold and leased products are excluded.

Category 12: End of Life of Sold Products

We calculate the end-of-life emissions of all sold products, including products excluded in category 11 due to lack of direct use emissions. We use average product-specific weights and assumed end of life treatment. We add 5% weight to all products to account for packaging and assume 90% paper and cardboard for closed-loop recycling and 10% plastic for incineration (in weight). For the product we assume 90 % electronic waste for open-loop recycling and 10% electronic waste for incineration (in weight). Around 3% of total sold and leased products are excluded due to lack of data.

Intensity Metric: Emissions Intensity (Scope 1 & 2 CO₂e emissions)

Our emissions intensity is calculated based on total direct emissions from operations (Scope 1 and 2 greenhouse gas emissions measured in tons of CO₂e) per Terabyte of actual data traffic output in our network. The traffic reported is the average output traffic measured at the periphery of the network over a year.

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

Waste

Our suppliers provide our consumption data. The data is then split, based on the location of the waste into three categories: TDC Group, TDC NET and Nuuday. The waste flows that belong to TDC Group are then assigned to TDC NET and Nuuday based on the employee ratio, excluding the employees that are "on-site" technicians. The waste flows are assigned

to GRI categories, based on the type of waste and the final waste route. The detailed guidance for the split of the waste flows is provided in the "Waste Data tool" which is annually updated.

Our procurement team provides our Customer Product Refurbishment data. This data is:

- The number of customer premises equipment (CPE) units that were refurbished in the reporting year is a tally of all the CPE units that were called back and refurbished for reuse during the reporting year. CPE units include routers and TV set-top boxes that Nuuday deploys to its customers.
- The percentage of refurbished of total CPE units is the number of all the CPE units Nuuday purchased that were refurbished in 2022 divided by the total number of CPE units Nuuday purchased in 2022, expressed as a percentage.
- The avoided e-waste is the weight of the refurbished units in metric tonnes that were purchased by Nuuday in the reporting year.

Non-Environmental Data Reporting Boundaries

Occupational Health & Safety (OH&S) data

Our OH&S is calculated based on a headcount as per HR data. Other definitions include:

- The number of fatalities is the tally of incidents reported during the year.
- The number of accidents with lost time is the tally of incidents reported during the year where the employees did not come to work the following day due to the accident.
- The number of accidents without lost time is the tally of incidents reported during the year where the employees came to work the day after the accident.
- The number of days of absence is the total combined number of days where employees were absent from work due to work-related incidents.

- The rates are calculated in line with GRI reporting standard 403-9, where the rate of X is equal to the number of incidents of X in the reporting year per 1 million of hours worked. Hours worked is calculated based on the total headcount, as per HR data, over 46 weeks (average work year minus 6 weeks of annual leave).

Due to changes in our company structure, and our reporting process, historical figures for the ratios before 2020 are not available.

HR data

Our HR data is calculated based on year end, headcount data, and is taken from internal HR systems. Other definitions include:

- The number/percentage of employees by gender is the tally/percentage of employees who are men and who are women who are employees of the company during the reporting year at year end.
- The number/percentage of employees who are employed by contract type is the tally/percentage of employees who are employed at the company during the reporting year at year end who had either a permanent or a temporary contract, divided across gender (male / female).
- The number of employees by employment type is the tally of employees who are employed at the company during the reporting year at year end, who were either employed in a full-time or a part-time capacity, divided across gender (male / female).
- The number/percentage of employees by age group is a tally/percentage of employees who are employed at the company during the reporting year at year end, divided across three age brackets.
- The number/percentage of employees by employment category is a tally/percentage of employees who are employed at the company during the reporting year at year end, who have managerial or non-managerial responsibilities, divided across gender (male / female).
- The percentage of fathers and non-birth mothers taking parental leave is a

percentage of the total number of eligible fathers and non-birth mothers who are employed at the company during the reporting year at year end, who took parental leave during the reporting year.

- Number of nationalities is delivered primo every year, from Statistics Denmark and refers to the number of different nationalities in employees that are hired in the company per 31 December of the previous year. HR representative provides a list with civil registration number of the active employees at the end of 2022/beginning of 2023. After this, Statistics Denmark runs Nuuday data together with their information on nationality. Nuuday then receives a status that meets all the requirements of anonymity.

Due to changes in our company structure, historical figures before 2020 are not available.

Other Metrics

- Gender representation: The number/percentage of gender representation on the Board of Directors is a tally/percentage of the number of Directors on our Board of Directors who are men and who are women, at year end of the reporting year.
- Whistleblower: The number of Whistleblower reports to the Nuuday A/S Board of Directors is the tally of reports that came to the Board through the whistleblower program channels in the reporting year, that were deemed to be valid and appropriate.
- GDPR learning: The percentage of employees who completed a GDPR e-learning is the number of employees who were employed at the company at year end who completed a GDPR e-learning during the reporting year divided by the average number of employees who were employed at the company in the reporting year.
- NB: Due to technical issues the accounting principle is changed for 2022, as it is not possible retrospective to identify the employees who were eligible to complete the

training. The GDPR training should be completed every 18th month.

- Security learning: The percentage of employees who completed a voluntary security e-learning, is the number of employees who were employed at the company at year end, who completed a security e-learning during the reporting year, divided by the total number of employees who were employed at the company at year end and were eligible to complete the training. Year end is defined as 31 December, only e-learning completed before this date are to be included in the calculation for the reported figure.
- EcoVadis rating: The score received by Nuudays (in 2022 by the parent company TDC Group A/S) from the EcoVadis ESG assessment for the year 2022, which is based on previous years' data reporting and ongoing sustainability initiatives.
- Children's digital life: The number of classes that participated in Coding Class and IoT in Folkeskolen is a tally of all the classes that have participated in the programmes in 2022.
- Children's digital life: The number of children helped with acquiring digital skills through the Coding Class initiative since 2016 is a tally of the children who have participated in the industry-wide programme since the start of the programme in 2016 to the end of the reporting year 2022.

nuuday