

Norlys Sustainability Report 2024



E S G

NORLYS

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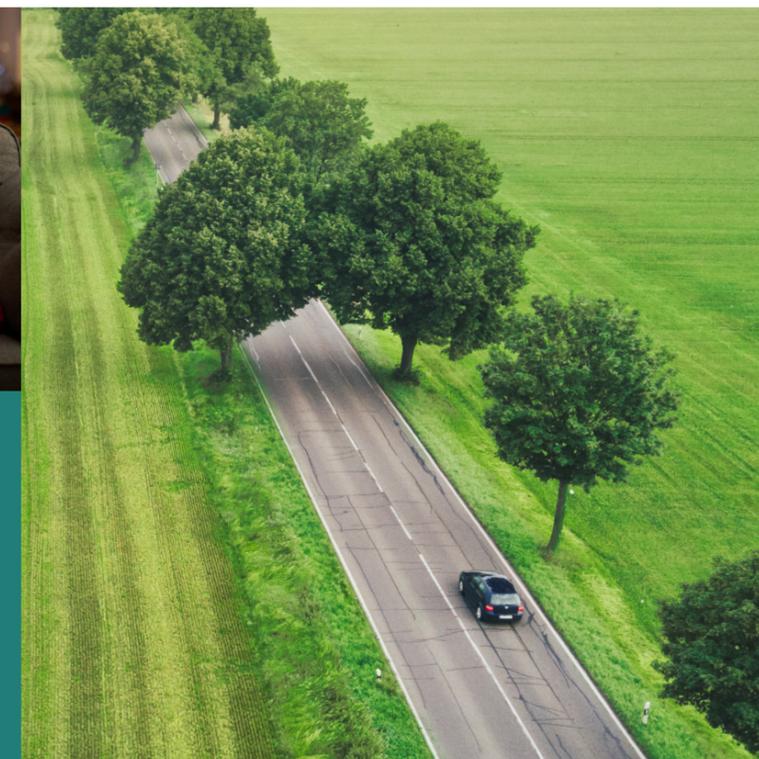
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Members*

805,000

Employees**

4,500



Electricity grid reliability

99.997%

Norlys in brief

Investments in 2024

4,175
million DKK



Norlys is Denmark's largest integrated energy and telecommunications group with 4,500 employees in Silkeborg, Aarhus, Aalborg, Esbjerg, Copenhagen and a number of smaller cities. We supply energy, charging stations, internet, TV, streaming and mobile telephony services to more than 3.5 million households and businesses. Norlys is owned by 805,000 members.

We are committed to the green transition and digitalisation. In addition to our customer-facing activities, we own Denmark's largest electricity grid and fibre network, half of Denmark's largest mobile network and charging infrastructure for electric cars. We own a majority stake in the energy trading company Norlys Energy Trading and are co-owners of Eurowind Energy, a leading developer of solar and wind farms.

Number of fibre locations

903,000

Mobile network best in test with

979 out of 1,000
possible points

Customer relationships

3,500,000



Members of the Board of Representatives*

661

*End-2024. **Number of employees is based on headcounts.

Norlys' company structure

NORLYS

a.m.b.a.

Norlys' 805,000 members

Norlys Group A/S

Active owner of Norlys' entire portfolio of companies

Core business

Ownership interest	Companies	Activity
100%	Kundeselskabet Norlys Norlys Digital A/S Telia Mobil Danmark A/S Norlys Energi A/S Norlys Charging ApS Kundeselskabet Norlys A/S	Operates Norlys' customer-facing activities with a wide range of internet, TV, mobile, electricity and charging solutions
65%	Norlys Fibernet Norlys Infrastructure Holding A/S Norlys Fiber Infrastructure A/S Norlys Fibernet A/S	Operates and develops Denmark's largest fibre network where customers are free to choose between a large number of commercial providers
100%	 Elnetselskabet N1	Operates and develops Denmark's geographically largest electricity grid, enabling a green future with more renewable energy

Other wholly and partly owned companies

Ownership interest	Companies	Activity
49.8%	 Eurowind Energy	Develops, builds and operates renewable energy farms
52.7%	NORLYS ENERGY TRADING	Risk management, electricity and gas balancing and trading
100%	 OpenNet	Collaboration platform for fibre network providers
55.9%	 GreenLab	Green and circular industrial park
50%	 TT-Netværket	Mobile infrastructure
99.9%	 Tangeværket Gudenaacentralen	Hydroelectric power plant
100%	Karlsgårde Vandkraft	Former hydroelectric power plant
60%	 AUTOMIZE	IT operations, digitalisation and business process automation
97.3%	 Mjolner	Software, data, innovation and digitalisation

See note 12 on page 45 in the annual financial report for a complete overview of the companies

Preface

The rapid change and unpredictability of the global landscape continued in 2024. Geopolitical tensions, climate change and technological breakthroughs have affected how we think about energy and communication. As Denmark's largest integrated energy and telecommunications group – and as a cooperative – we have a special responsibility to think long-term and act for our common good.

Accelerating the electrification of Denmark

The electrification of society places new demands on the capacity of our electricity grid as we increase the integration of renewable energy sources. To ensure stability and energy security, energy independence is crucial. In 2024, we therefore focused on strengthening the electricity grid infrastructure and resilience as a key part of the green transition and electrification of Denmark. We invested DKK 1.5 billion in security measures, expanded capacity and integration of large wind and solar farms.

We also took significant steps towards our ambition of establishing a nationwide EV charging network for the benefit of all Danes, installing more than 3,000 public charging stations during the year, equivalent to eight charging stations per day. We also worked to electrify Norlys' own fleet of passenger cars. Even though we have made good progress on our own cars, the electrification of our vans remains a challenge as the technological solutions available today do not yet fully match our needs.

Increased energy awareness

Helping Danes make greener choices is an important commitment for us. We want to support and increase Danes' energy awareness through products and solutions that can promote both financial responsibility and environmental considerations. It is not just about delivering energy, but also about inspiring and guiding people to make greener choices accessible and understandable for everyone.

In the field of telecommunications, digital development has accelerated, increasing the need for stable and secure high-speed connections. 5G technology, IoT and artificial

intelligence open up new opportunities, but also increase dependence on reliable networks. Our role has been to ensure that the digital transformation creates value for society, supports the digitalisation of Denmark and connects cities and rural areas. We have invested in the security of our digital infrastructure, worked to reduce the energy consumption of our masts and expanded both fibre and 5G coverage, among other things.

A vibrant cooperative democracy

As a cooperative, our reason for being is closely linked to our geographical membership catchment area. We do not have shareholders, but a commitment to create value for our members, customers and society. This structure means that our focus is not only on financial performance, but also on sustainable and long-term solutions that benefit future generations. During the year, we discussed Norlys' strategy and targets with our Board of Directors and Board of Representatives at several dialogue meetings, and we are committed to raising awareness among our members about their role and importance as co-owners of Norlys.

We know that an attractive workplace is essential for retaining and attracting talented employees. Thanks to our continuous efforts to create a strong culture, we continue to rank high in surveys of Denmark's most attractive workplaces. This year we also published our preliminary data and experience with removing the cap on children's sick days, as we want to inspire others at a time when family policy is an important topic in the social debate.

In this report, we provide insight into the progress we have made in environment (E), social responsibility (S) and governance (G), as well as the areas where there is room for improvement.

Gert Vinther Jørgensen, Group CEO of the Norlys Group



“As a cooperative group, we have a unique opportunity to think long-term and invest with patience. We see investments in critical infrastructure as an investment in the community, where assets remain in the country and create value in both urban and rural areas. We take responsibility for pushing Denmark in a greener and more digital direction for the benefit of the entire country.”

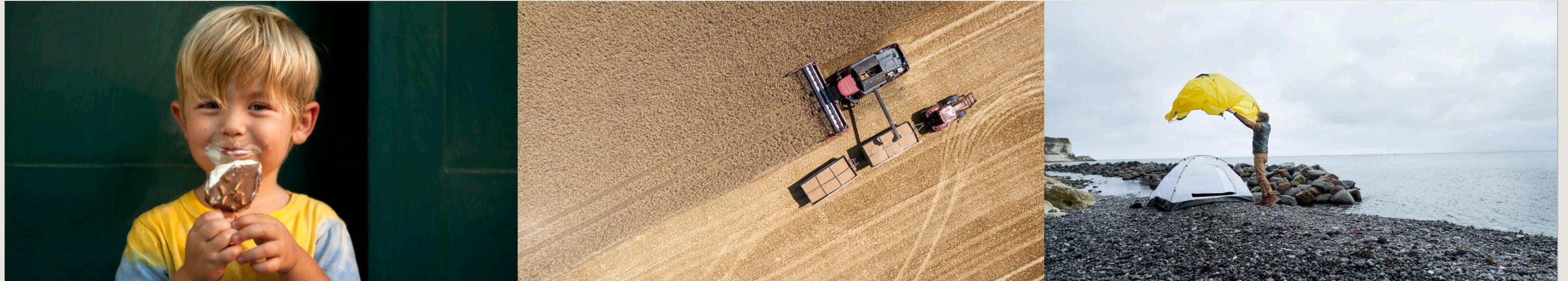
Gert Vinther Jørgensen, Group CEO

General information



General basis for preparation of sustainability statements

BP-1



About this sustainability report

This report marks an important step in Norlys’ journey towards more comprehensive and structured sustainability reporting. Although we are not yet required to report according to the Corporate Sustainability Reporting Directive, we chose to report voluntarily and gradually align parts of our reporting in both 2023 and 2024. This was done to ensure transparency and to build the necessary experience and processes to strengthen our future reporting before we are formally subject to the extended reporting requirements.

New company and management structure

In 2024, Norlys underwent a major organisational change. The new structure divides Norlys into a strategic owner company in the Norlys Group and a number of portfolio companies, including three independent companies in the core business: Kundeselskabet Norlys, Elnetselskabet

N1 and Norlys Fibernet. This structure strengthens the autonomy and execution power of the portfolio companies, allowing each company to focus on their core business. This report continues to reflect several joint projects for the Norlys Group and the core business companies, especially in areas such as People & Culture. But in the coming years, each company will have independent responsibility for working with green transition and sustainability efforts in their respective business areas.

Baseline year and improved data quality

2024 is the baseline year, where we focused on strengthening data quality. We appointed ESG data managers in all companies and significantly strengthened our governance. In 2024, we significantly improved the quality of the quantitative data. It is therefore not possible to compare data with previous years in several areas as historically we do not have sufficient data quality

in all important areas. The new baseline for our data, on the other hand, will give us a much better basis for documenting developments and trends over time.

Focus on essential topics

This report is based on Norlys’ double materiality assessment, which was revisited and revised in the third and fourth quarter 2024. Lessons learned from new guidelines, regulatory requirements and audits have led to significant changes in this report compared to previous sustainability reports. For example, we have fewer, but far more accurate impacts, risks and opportunities, based on a better methodological foundation.

Norlys’ new mobile business, Telia Mobil Danmark, is an important new business area where circularity plays a major role. Although identified as material, it will only be included in our sustainability report for the 2025

financial year once we have established the necessary data foundation.

Reporting items with insufficiently data quality have been omitted as a deliberate choice in this voluntary reporting. This ensures that we focus on the areas where we can present reliable data.

Consolidation

BP-1/5a | The sustainability report is prepared on a consolidated basis. The scope of consolidation is the same as for the financial statements. No subsidiaries included in the consolidation are excluded from the consolidated sustainability reporting.

Value chain

BP-1/5c | The sustainability report includes Norlys’ upstream and downstream value chain to the extent found relevant in connection with the double materiality assessment. This means that both the upstream and downstream value chains are covered under the climate impact topic (E1) and the downstream value chain is addressed under the impact on consumers and end-users topic (S4).

Omissions

BP-1/5d | Norlys has not used the option to omit a specific piece of information corresponding to intellectual property, know-how or the results of innovation.

BP-1/5e | Norlys has not used the exemption from disclosure of impending developments or issues during negotiation.

Disclosures in relation to specific circumstances

BP-2



Time horizons

BP-2/9 | Norlys has not deviated from the time horizons defined in ESRS 1.

Value chain estimation

BP-2/10a-c | Most categories in scope 3 are based on spend data. However, the distribution of primary and secondary data is close to 50/50. All electricity-related data is based on the distribution per price area published in Energinet’s Environmental Declaration. To increase accuracy and data quality, Norlys is continuously working to move away from spend calculations and towards more primary data. In addition, work is being done on general internal data refinement by, among other things, working closely with stakeholders and strengthening the ESG-related categorisation of data. For further information on the basis for preparation, see the appendix ‘Carbon accounting manual’ on page 83.

Sources of estimation and outcome uncertainty

BP-2/11a-b | S1 Own workforce: It has been assessed that the greatest uncertainty in relation to S1-related data (own workforce) lies in the concept definitions. Sections S1-6 to S1-17 therefore specify definitions of terms across the entire Norlys Group. In addition, minor uncertainty exists as Norlys has switched to a new HR system and aggregated data from several systems. For more insight into assumptions, assessments and methodological changes, see ‘Norlys’ workforce in numbers’ on pages 65-70.

Scope 1 and 2: The greatest uncertainty in relation to scope 1 and 2 calculations is partially due to extrapolation of the data foundation for Norlys’ vehicles due to the change of systems. This, combined with the fact that there are many systems that contain car data, can lead to uncertainties in the aggregation of data across companies in the consolidation phase. For data related to buildings (electricity and heating) and other electricity, there may

be multiple metering points at the same address on eloverblik.dk, which may involve a risk of double counting at the individual locations.

Scope 3: In relation to scope 3, there is inherent uncertainty in using spend data and other secondary data. In addition, uncertainties exist in the categorisation and assignment of emission factors to the respective financial accounts. By considering individual invoices, suppliers/creditors and case-by-case assessments of emission factor sources etc., it is sought to minimise this uncertainty.

By using a spend-based approach, it is assumed that a potential over- or underestimation of CO₂e is balanced out between the respective accounts, and that other over- or underestimates (accounting estimates etc.) are equalised over time. For more information on approximations and assessments, see the appendix ‘Carbon accounting manual’ on page 83.

Changes in information

BP-2/13+14 | In 2024, we focused on improving our data quality. We have ensured that there are ESG Data Officers or other ESG data responsible persons in all companies, and therefore our governance has improved significantly. Because we have a much better data foundation, the data in this report will serve as the baseline.

In 2024, Norlys acquired Telia Mobil Danmark, which affects the results to a greater or lesser extent depending on the reporting point. Had Norlys been legally subject to the CSRD, data would have to be corrected retrospectively. As Norlys has chosen 2024 as the baseline year, data is not changed retrospectively, which is why data from Telia Mobil Danmark for 2023 or earlier is not included. However, data for previous years is included to make it possible to follow Norlys’ factual development. In these comparisons, it is explicitly stated if 2024 data is exclusive Telia Mobil Danmark data.

Compared to scope 1 and 2, the biggest methodological change is that we refine the data by using a breakdown into DK1, DK2 or, where this breakdown has not been possible, an average, instead of using Electricity Denmark 125%. In addition, a change in grid loss emission factors as well as improved data quality of SF6 inventory influence the increase from 2023 to 2024.

The changes for S1 data are described in S1-6 Important comments on changes in data regarding Norlys’ own workforce’ on page 66 and in S1-6 to S1-17.

Disclosures stemming from other legislation

BP-2/15 | This sustainability report contains the reporting requirements derived from the requirements of the Taxonomy Regulation (2020/852) See the reporting in the section ‘EU Taxonomy’.

Role of administrative, management and supervisory bodies

GOV-1

In 2022, Norlys established an ESG organisation with the aim of ensuring a clear and well-defined management structure for its sustainability work. The Board of Directors of Norlys a.m.b.a. has the overall supervisory responsibility, while the strategic and tactical activities are led by an ESG Steering Committee. Relevant impacts, opportunities and risks are reported to management on a regular basis,

and we are continuously working to strengthen our due diligence processes.

The following sections describe Norlys’ management structure and the organisation of our sustainability work, including due diligence, incentive structures and risk management.

GOV-1/22

The Board of Directors of Norlys a.m.b.a.

The Board of Representatives appoints the Board of Directors of Norlys a.m.b.a., which constitutes the senior management of Norlys, approving the company’s strategy and budgets.

Norlys’ Board of Directors consists of 19 members*, 15 of which are elected by and among the Board of Representatives, and four are employee-elected. Norlys has approximately 805,000 members, who every four years elect one representative for each 1,100 members to the Board of Representatives. The 15 owner-elected members of the Board of Directors are elected by the Board of Representatives with a geographically equal representation from 15 electoral areas. Employee representation is ensured through a voluntary scheme, which has been approved by the Group’s Cooperation Committee. Consequently, the Board of Directors consists exclusively of democratically elected members. It is possible for the Board of Directors to appoint an Advisory Board, but they cannot appoint non-executive board members.

*As one member stepped down during the election period, there were 18 members as at September 2024. A new member will be elected at the meeting of the Board of Representatives in 2025.

Board committees

Norlys has set up two standing committees to oversee our corporate governance:

- The Risk and Audit Committee, which consisted of four members in 2024 elected from the Board of Directors of Norlys a.m.b.a.
- The Governance and Competence Committee, which consists of six members elected from the Board of Directors of Norlys a.m.b.a.

The Governance and Competence Committee

The Governance and Competence Committee (GKU) is responsible for preparing the Board of Directors’

consideration of issues related to the Norlys Group’s governance structure, rules of procedure and other tasks that the Board of Directors wants the committee to consider and propose for resolution by the Board of Directors. In addition, the committee is responsible for amendments to remuneration and articles of association. Finally, the committee informs the work of the Board of Directors with a view to ensuring that the Board of Directors and the Executive Board continuously have the necessary knowledge and experience to perform their respective tasks, and that the Board of Directors annually evaluates the work of the Board of Directors.

The Risk and Audit Committee

The Risk and Audit Committee is, among other things, responsible for preparing the Group Board of Directors’ consideration of audit and accounting matters, including financial reporting, risk management and reporting from the audit. An Asset Management Committee has been set up to support the work of the Risk and Audit Committee. The auditors attend all ordinary meetings of the Risk and Audit Committee. Traditionally, the Risk and Audit Committee has had a strong focus on ESG governance topics, and to ensure CSRD compliance and effective ESG risk management, the committee will increase its focus on integrating the work with the ESG impacts, risks and opportunities identified in the double materiality assessment. As a result of the increased focus, from 1 January 2025, the committee will be expanded with an additional committee member with special ESG competencies. The Risk and Audit Committee brings important ESG issues to the Board of Directors of Norlys a.m.b.a.

Executive Board

The Executive Board is responsible for the day-to-day management and is therefore also responsible for Norlys’ ESG efforts and ESG strategy.

Mandate

GOV-1/22b | Norlys’ Governance Guide provides members

of the Board of Representatives and the Board of Directors with insight into and an understanding of the framework for the day-to-day management and governance of the Norlys Group. It ensures that all members are equipped to perform their roles in the best possible way and supports openness and transparency in the Group. The Governance Guide also specifies responsibilities and mandates for the different bodies within Norlys, ensuring a clear division of responsibility for impacts, risks and opportunities – also within the ESG area.

To ensure strong governance, the Board of Directors of Norlys a.m.b.a. complies with the recommendations on corporate governance for consumer-owned utilities prepared by Green Power Denmark. Twenty-three out of 25 recommendations are complied with in full, while the recommendation concerning a maximum of 15 board members is not complied with, the aim being to ensure greater involvement of the Board of Representatives. Furthermore, the Board of Directors consists exclusively of democratically elected members. The annual reporting is publicly available on our website, norlys.dk.

The division of tasks and responsibilities regarding sustainable management is described in the Governance Guide. Norlys a.m.b.a. Board of Directors works strategically and oversee the area, while the tactical activities are led by an ESG Steering Committee, consisting of representatives from the Executive Board (CFO), ESG owners, Group ESG Finance and Group Public Affairs & Sustainability, and implemented in the companies. Relevant impacts, opportunities and risks are reported to the Board of Directors on a regular basis. The Board of Representatives is also informed of the status of the Group’s ESG efforts at the annual meeting of the Board of Representatives.

As can be seen from this sustainability report, responsibility for the policies that affect material impacts, risks and opportunities lies with the relevant VPs in the Group.

GOV-1/21

Number of executive and non-executive members

The Executive Board consists of two members (executive) who have eight members in direct reference (non-executive).

Representation of employees and other workers

Four members of the Board of Directors of Norlys a.m.b.a. are elected by the employees.

Experience relevant to the sectors, products and geographic locations of the business

Norlys’ Executive Board possesses expertise in both the business and technical areas of the energy and telecommunications industries, including competencies in sustainability-related matters.

The Board of Directors of Norlys a.m.b.a. has broad business and technical knowledge. The Board of Directors consists of democratically elected members, see the description in GOV-1/22. To ensure transparency, an overview of the competencies and experience of each board member is publicly available on our website, norlys.dk.

From 1 January 2025, the subject-specific competency needs of the Risk and Audit Committee in relation to ESG are defined as insight into ESG at a strategic level.

Percentage by gender and other aspects of diversity that the business considers

Direct reports to the Executive Board comprise three women (38%) and five men (62%).

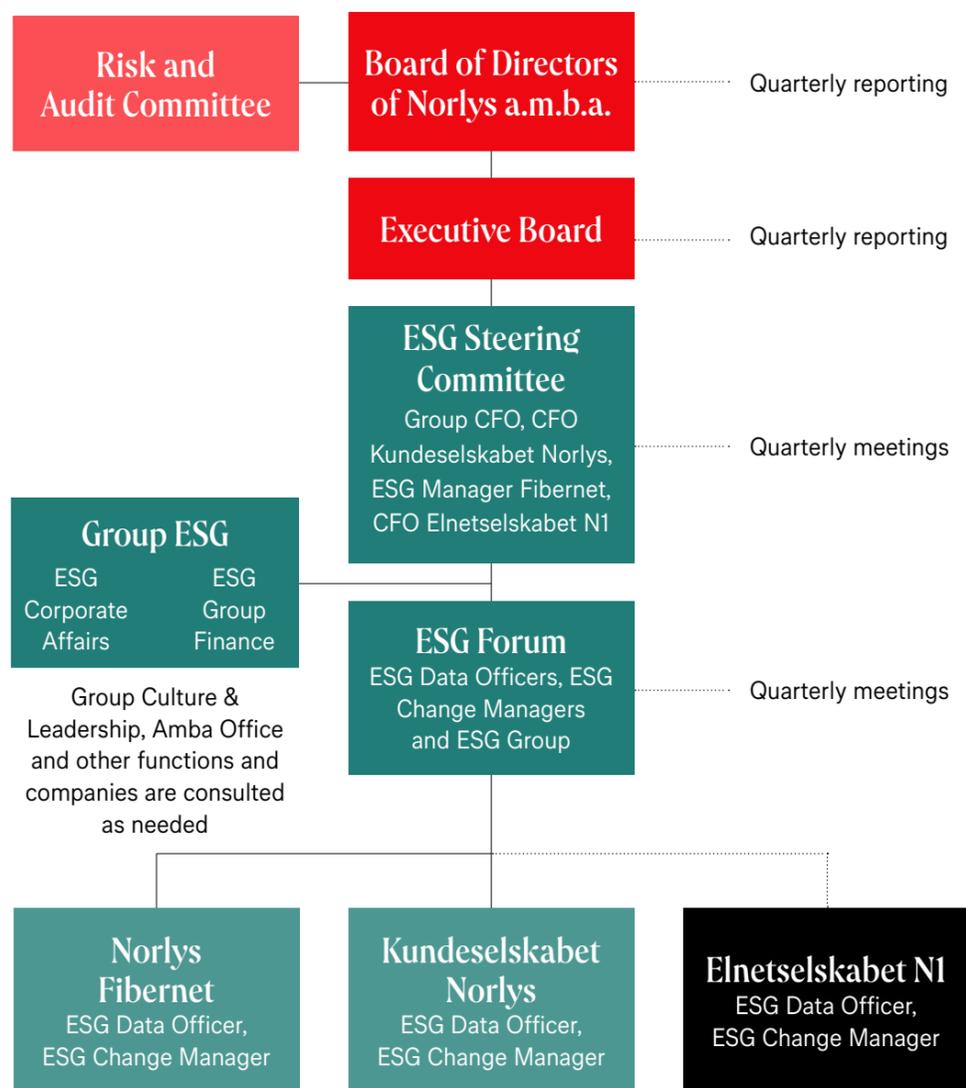
The Executive Board consists of one woman (50%) and one man (50%).

Since September 2024, the Board of Directors of Norlys a.m.b.a. consists of three women (17%) and 15 men (83%).

Percentage of independent board members

14 out of 18 board members are independent, corresponding to 78% independent members.

ESG governance



ESG governance

GOV-1/22c | As per the description of the Audit and Risk Committee in GOV-1/22a, the committee has ultimate responsibility for overseeing ESG risks, impacts and opportunities.

GOV-1/22c-i | Norlys has set up an ESG organisation which consists of an ESG Group function, an ESG Forum and an ESG Steering Committee. The ESG Steering Committee is mandated to make management decisions within ESG to ensure that we can act with due diligence. If a matter cannot be resolved within this ESG organisation, a decision can be made via other established channels, such as the Executive Board or the Board of Directors of Norlys a.m.b.a.

ESG Steering Committee

The steering committee monitors progress across the companies and addresses the demands and expectations of society and customers. The steering committee meets quarterly.

The ESG Steering Committee consists of the Group CFO and ESG owners of Elnetselskabet N1 (CFO), Norlys Fibernet (Head of Strategy and Transformation) and Kundeselskabet Norlys (CFO). Group ESG acts as the secretariat for the ESG Steering Committee.

ESG Forum

The ESG Forum consists of representatives from the Norlys Group and each of the following companies: Kundeselskabet Norlys, Norlys Fibernet and Elnetselskabet N1. The ESG Forum meets quarterly.

Each company appoints two representatives to the ESG Forum: An ESG Data Officer and an ESG Change Manager. The ESG Forum ensures progress on CSRD compliance and Norlys' ESG targets across the organisation. If dilemmas of a strategic nature arise, the ESG Forum pass them on to the ESG Steering Committee.

Group ESG

Norlys' ESG efforts are anchored in Group ESG and managed in a collaboration between Public Affairs & Sustainability and Group ESG Finance. The two teams are responsible for developing the Group's ESG strategy, ensuring CSRD and other ESG compliance at group level, monitoring progress, prioritising activities, coordinating and reporting at group level.

Reporting lines

GOV-1/22c-ii-iii | Group ESG reports quarterly to the Executive Board and the Board of Directors of Norlys a.m.b.a. on the status and progress of ESG topics, including relevant impacts, risks and opportunities. The ESG Steering Committee considers material ESG topics on a quarterly basis.

The Risk and Audit Committee is regularly notified of any reports made through the whistleblower system. The notification is based on the principles of whistleblower protection and is anonymised and general in nature.

Monitoring targets and progress

GOV-1/22d | As detailed in this sustainability report, our material impacts, risks and opportunities occur across the business and are managed in relevant parts of the organisation. Our climate targets, which include reducing pollution from driving, have been approved by both the Executive Board and the Board of Directors of Norlys a.m.b.a. Progress is monitored through the sustainability report and reporting to the Board of Directors. The Board of Directors receives quarterly reporting on the group strategy, including the non-financial targets defined in the owner strategy.

Cyber security is continuously monitored through reporting to the Risk and Audit Committee and the Executive Board. As described in section S1-2 Employee involvement on page 55, new targets for our own workforce are discussed in the Cooperation Committee and going forward in the new cooperation committees in the individual companies in which the respective CEOs participate. Progress on

work-related targets, such as work accidents, diversity metrics and sick leave, is monitored and discussed in management groups and the Core Leadership Team (CLT), where the Executive Board is also represented.

Sustainability competences

GOV-1/23a | Norlys has a specialised ESG function to ensure that we comply with applicable ESG requirements and expectations. Elnetselskabet N1, Norlys Fibernet and Kundeselskabet Norlys employ ESG specialists for ESG change projects and ESG data collection. Competence building takes place both centrally in the Group and decentralised in the individual companies, and in 2024 Norlys' Group CFO completed a training course in sustainability data auditing.

The members of the Board of Directors of Norlys a.m.b.a. are democratically elected among the members, and therefore the Board of Directors has a special focus on ensuring and developing their competencies within strategic and financial management and sustainability, where we are currently awaiting the development of an industry standard. The Board of Directors' Governance and Competence Committee evaluates the competence level annually and prepares a development plan. All members undergo board training at Aarhus University, and in 2024 they completed a NIS2 course and an ESG masterclass.

In addition, the individual companies have independent boards consisting of members of the Board of Directors of Norlys a.m.b.a., members of the Norlys Group and independent external members with relevant competencies. External members are recruited based on ongoing identification of the competencies needed. The need is approved by the Board of Directors of Norlys a.m.b.a.

GOV-1/23b | As described in section SMB3 and GOV-2/26, the identified impacts, risks and opportunities are linked to specific parts of our business and business model and consequently the expertise is associated with specialised knowledge of the relevant business areas.



Information provided to and sustainability matters addressed by the business' administrative, management and supervisory bodies

GOV-2

GOV-2/26a | The Executive Board and the Board of Directors of Norlys a.m.b.a. receive quarterly status reports on Norlys' ESG work. The ESG reporting contains a description of progress on Norlys' ESG work, including projects that contribute to mitigating risks and impacts identified as material. Progress and challenges are discussed at the time of the status reporting, and a plan for the next quarter is presented. ESG reporting is carried out and coordinated by Group ESG consisting of Public Affairs & Sustainability and Group ESG Finance.

The results of the double materiality assessment are reviewed once a year in the ESG Steering Committee, the Risk and Audit Committee and the Board of Directors of Norlys a.m.b.a.

The ESG Steering Committee meets quarterly to discuss ESG issues in the Group, including progress and challenges concerning projects to mitigate significant risks and impacts.

Material impacts, risks and opportunities addressed by the administrative, management and supervisory bodies

GOV-2/26b | Several impacts, risks and opportunities are business critical and are therefore regularly discussed by management. Expansion of the electricity grid and future-proofing of the electricity grid, referred to as the degree of electrification, are discussed by management and the Board of Directors of Elnetselskabet N1 and is integrated into the strategy processes.

Similarly, safety for consumer and end-user is essential to ensure a healthy business and is therefore an integral element of risk management in our customer business and in the companies that support critical functions. IT security is the responsibility of the Group CISO and a CISO network across the companies.

Progress on the group strategy is reviewed quarterly by both the Executive Board and management, and ESG progress, including relevant impacts, risks and opportunities, is discussed with the Executive Board and the Board of Directors in continuation of the group strategy.

From 2025, ESG will be integrated into the Group's Investment Board, and the Risk and Audit Committee will be expanded with an ESG resource.

ESG impacts, risks and opportunities are thus discussed across the organisation, and trade-offs take place continuously. In particular, the actions needed to reduce carbon emissions require changed processes and perspectives on both major transactions and risks.

All material ESG topics identified in the double materiality assessment are presented to the Executive Board, the Risk and Audit Committee, the Board of Directors of Norlys a.m.b.a. and Norlys' ESG Steering Committee.

Information provided to and sustainability matters addressed by the business' administrative, management and supervisory bodies

E1 Climate change

Grid loss	Discussed in the ESG Steering Committee and management of Elnetselskabet N1.
Scope 3 data collection	Discussed in the ESG Steering Committee and in the reporting to the Board of Directors of Norlys a.m.b.a.
Expansion and future-proofing of the electricity grid	Discussed in the Board of Directors and management of Elnetselskabet N1.
Long-term investments that future-proof the green and digital infrastructure.	Investments in the electricity grid, fibre network and e-mobility infrastructure are discussed in the Investment Board, the Executive Board or in company managements according to our governance structure. In addition, the Asset Management Committee has decided to invest in the Climate Infrastructure Fund.
Climate adaptation of critical infrastructure	Discussed in the managements of Elnetselskabet N1 and Norlys Fibernet.

E2 Pollution

Conversion of vans from diesel to electricity	Discussed in the ESG Steering Committee as well as the managements of Elnetselskabet N1 and Norlys Fibernet.
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S1 Own workforce

Employee safety	Discussed in the General Health and Safety Committee.
Employee conditions	Discussed in the Cooperation Committee.
Diversity in management	Discussed in the Executive Board, in company managements and Norlys' Core Leadership Team and in the status reporting to the Board of Directors of Norlys a.m.b.a.

S4 Consumers and end-users

IT security, including consumer safety and consumer data protection	Discussed in company managements, the Executive Board and the Risk and Audit Committee.
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G1 Business conduct

Political influence and lobbying activities	The Executive Board and Core Leadership Team are informed of relevant political agendas and actions and topics that require special attention on a regular basis, such as the framework for regulation of the telecommunications sector, including negotiations on a new telecommunications agreement and the framework for investment in digital infrastructure.
Whistleblower system	WB is handled in the Amba Office, but is the responsibility of the chairman of the Risk and Audit Committee. WB is discussed at every meeting of Risk and Audit Committee.
Corporate culture	The major reorganisation of Norlys has led to a strong focus on corporate culture, with the topic being discussed in company managements, the Executive Board, the Risk and Audit Committee and the Board of Directors of Norlys a.m.b.a.

Integration of sustainability-related performance in incentive schemes

GOV-3

GOV-3/29a | Our bonus programme builds on and supports the Norlys culture. The bonus programme helps support the community and cohesion in Norlys and maintain Norlys' strong reputation. In addition, the bonus scheme drives responsible behaviour among employees, ensuring value creation in the company by rewarding both financial and non-financial performance.

All employees in the Norlys Group, Norlys Fibernet, Elnetselskabet N1 and Kundeselskabet Norlys are covered by a bonus scheme. The different bonus programmes have a built-in cap. Norlys has a remuneration policy that describes the framework for the total remuneration of the Board of Directors and the Executive Board of Norlys. The policy covers all group companies in which Norlys has an ownership interest of more than 50%. The policy is publicly available on norlys.dk.

Sustainability-related bonus targets

GOV-3/29b | In addition to operating profit and company-specific bonus targets, employee satisfaction is integrated as a target in the incentive scheme for the Executive Board and all managers.

GOV-3/29c | Norlys employs 4,500 people, and their satisfaction and motivation are key to being able to run a responsible and sustainable business. That is why we have integrated job satisfaction targets into the managers' bonus scheme in the Norlys Group, Norlys Fibernet, Elnetselskabet N1 and Kundeselskabet Norlys.

GOV-3/29d | Employee satisfaction accounts for 20% of the managers' bonus scheme.

GOV-3/29e | The remuneration policy and bonus targets are updated annually. The remuneration policy is approved by the Board of Directors of Norlys a.m.b.a. Bonus targets in the Group are set by the Executive Board and the Executive Board of the individual companies sets bonus targets for their respective companies. These are approved by the company's Chairman of the Board.

Statement on due diligence

GOV-4

GOV-4/33 | We continuously develop and improve our due diligence processes. This also applies to sustainability. Due diligence refers to the identification and handling of conditions that may impact, for example, working conditions, human rights, climate or the environment. Processes and procedures supporting our sustainability due diligence are broadly integrated in our business

activities and are described several places in the sustainability report. The overview below shows our due diligence activities and refers to relevant sections where these activities are described.

Core elements of due diligence	Sections in the sustainability report
Embedding due diligence in governance, strategy and business model	<ul style="list-style-type: none"> Norlys' ESG governance model, see GOV-1 on page 9 Process for consideration of ESG matters on the Board of Directors of Norlys a.m.b.a., see GOV-2 on page 11 Other procedures and governance structures that ensure management and control of ESG implementation, strategy and ESG targets, see GOV-1 on page 9 Health and safety due diligence, see S1-3 Health and safety on page 64 Equal treatment due diligence, see S1-4 Equal treatment and equal opportunities for all on page 61 Climate change due diligence, see E1 Climate change on page 34
Engaging with affected stakeholders in all key steps of the due diligence process	<ul style="list-style-type: none"> Health and safety of own workers, see S1-2 Employee involvement on page 55 Equal treatment and equal opportunities for own workers, see S1-2 Employee involvement on page 55 Climate change, see E1 Climate change on page 35 Protection of consumers and end-users, see S4-2 and S4-3 on page 73
Identifying and assessing adverse impacts	<ul style="list-style-type: none"> The double materiality assessment and the process of identifying material ESG impacts, risks and opportunities are described in IRO-1 on page 25
Taking actions to address those adverse impacts	<ul style="list-style-type: none"> Health and safety of own workers, see S1-4 on page 64 Equal treatment and equal opportunities for own workers, see S1-4 on page 61 Climate change, see E1 on page 35 Protection of consumers and end-users, see S4-4 on page 74
Tracking the effectiveness of these efforts and communicating	<ul style="list-style-type: none"> ESG strategy progress is monitored via ESG KPIs, see 'Sustainability in Norlys' strategy' on page 17 Norlys' sustainability reporting complies with the Corporate Sustainability Reporting Directive (CSRD), communicating our progress in the annual sustainability report. Norlys provides a quarterly ESG progress report to the Board of Directors of Norlys a.m.b.a. Health and safety targets on occupational injuries, safety and sick leave are reviewed in the health and safety organisation, see S1-2 on page 55. Moreover, we track progress through the EcoVadis corporate sustainability rating.

Risk management and internal controls over sustainability reporting

GOV-5

Risk management process

GOV-5/36a | Norlys' sustainability reporting is anchored in the Group in a partnership under Group Finance and Corporate Affairs. The departments ensure continuous monitoring of progress on the reporting. To ensure the necessary data quality, a data governance organisation has been established across the Group, consisting of data officers and data controllers in the group companies. Progress on data collection is continuously monitored to ensure the validity of the reported data and reduce risks associated with data delivery.

The Norlys Group is responsible for governance in accordance with the CSRD.

Risk assessment approach

GOV-5/36b | In Norlys, risks are assessed based on a two-dimensional heatmap focusing on impact from a financial measure, a measure of the Group's ability to deliver via the critical infrastructure we own or brand/image. In addition, a measure of the probability of an incident is assessed.

Mitigation

GOV-5/36c | See the description in BP-2/10-11.

Integration of results of the risk assessment

GOV-5/36d | The risk management work is anchored in the Risk and Audit Committee and the Board of Directors of Norlys a.m.b.a. From 2025 and onwards, Norlys' risk management work will be further anchored directly in the group companies via the Audit and Risk Committees and the companies' own Board of Directors. The identified risks will be reported to the Norlys Group, where a joint overview of the Group's risks will be established and consolidated.

Sustainability data is reported to ESG Group Finance. In 2024, test data was reported in the fourth quarter 2024 to ensure an overview of data challenges and to validate data towards the final data delivery from the companies to Norlys Group Finance in early



2025. The aim was to be able to address and manage any data challenges.

Periodic reporting

GOV-5/36e | In the preparation of the sustainability report, a steering committee consisting of the CFO and group area managers/managers has been set up to monitor progress and manage risks associated with the sustainability reporting.

In addition to the steering committee, the Risk and Audit Committee, Norlys' chairmanship and the Board of Directors of Norlys a.m.b.a. regularly consider reporting on ESG matters. This happens with a quarterly frequency. In addition, the Risk and Audit Committee and the Board of Directors of Norlys a.m.b.a. consider and approve the double materiality assessment and the sustainability reporting on an annual basis before the results are published.

Strategy, business model and value chain

SBM-1



SBM-1/38

Norlys' fundamental purpose is to address critical challenges across the energy and telecommunications value chain – from developing and operating critical infrastructure to delivering solutions that connect people, businesses and communities. This requires both scale and a long-term approach.

Our ownership mandate is to promote digitalisation and the green transition, as described in Norlys' ownership strategy. Our owners and customers will be part of a modern society through future-proof infrastructure and a sustainable energy supply that is the foundation of a green and digital Denmark.

As a cooperative group that owns electricity and digital infrastructure, we have a unique opportunity to think long-term and invest with patience. We see investments in critical infrastructure as an investment in the community, where assets remain in Denmark and benefit both urban and rural areas. Our job is to invest strategically to meet current needs and ensure future development.

Norlys' products and services

SBM-1/40a-i | Norlys is Denmark's largest integrated energy and telecommunications group. We are owned by 805,000 members whom we supply with energy daily, and we provide energy, charging stations,

internet, TV and mobile services to customers across Denmark. There is functional separation between Elnetselskabet N1 and the rest of the Norlys Group. We own Denmark's largest fibre network covering over 1 million addresses and, through our ownership of Telia Mobil Danmark, half of the country's largest mobile network. In addition, we own a majority stake in Norlys Energy Trading and the green and circular industrial park Greenlab, and just under half of Eurowind Energy, a leading Northern European developer of solar and wind farms. With OpenNet, we provide a collaborative model and an IT platform for opening up fibre networks, making it easier for service providers and network owners to work together. Our co-ownerships of Automize and Mjølner support our digitalisation journey.

In April 2024, Norlys acquired Telia's Danish mobile business, which also includes a 50% share of the mobile network, TT Netværket. As such, Norlys has expanded its business with a mobile business and network that will help ensure broad mobile coverage. Our key products and services are described below.

Products and services				
Elnetselskabet N1	Norlys Fibernet	Kundeselskabet Norlys		
Operation, maintenance and future-proofing of the electricity grid and connection of renewable energy.	Expansion, operation, maintenance and development of fibre-based communication networks and connection of new customers	Broadband, TV, landline telephony and home office solutions	Electricity and gas trading, charging infrastructure for electric and hybrid cars	Mobile telephony and mobile internet services, IoT devices, TT network
Norlys Energy Trading	OpenNet	Mjølner and Automize	GreenLab Skive	Eurowind Energy
Risk management, electricity and gas balancing and trading	Collaboration platform for fibre network providers	IT operations, software, data, digitalisation and automation	Green and circular industrial park	Land-based solar and wind energy

SBM-1/40a-ii | Norlys’ primary products and services are targeted at the Danish market. OpenNet, Norlys Energy Trading and Eurowind also have activities in the European and international markets.

SBM-1/40a-iii | As no more than 50 employees or 10% of Norlys’ employees are based outside Denmark, the total number of employees is not broken down by country and overall, the geographical area for Norlys’ employees is Denmark, see S1-6/40b.

SBM-1/40a-iv | Norlys does not provide products and services that are prohibited on the Danish or European market.

For insight into operating segments in accordance with IFRS 8, see the annual financial report, note 3.

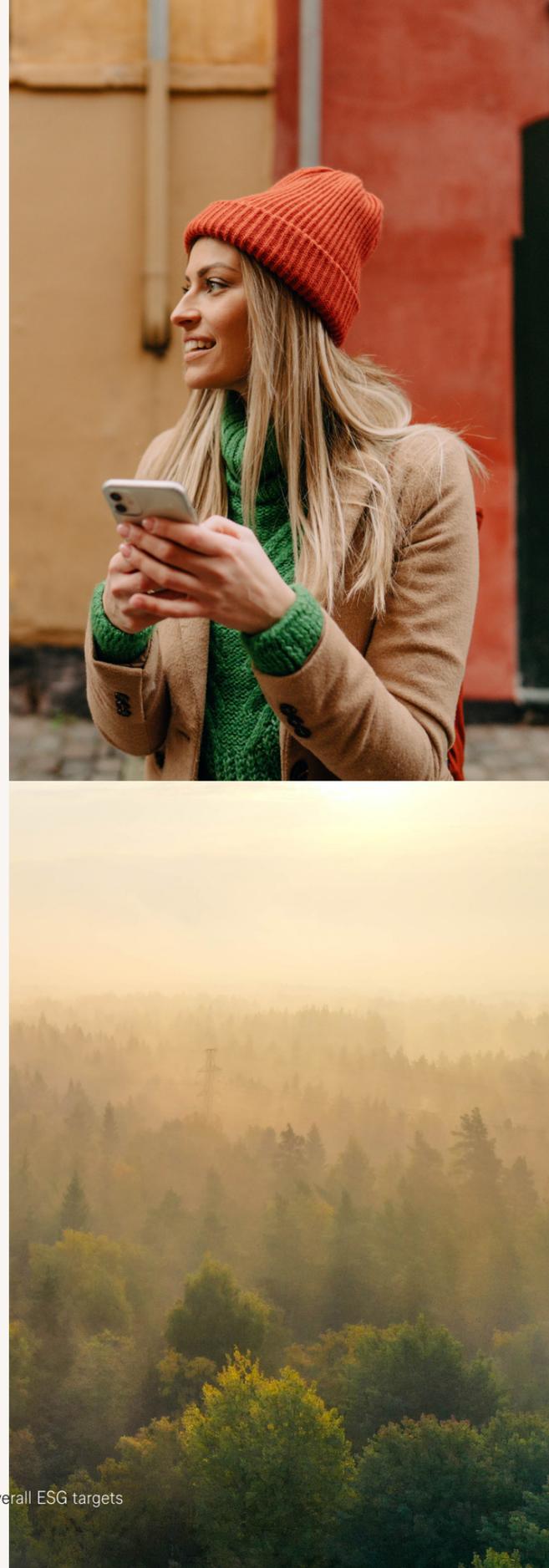
SBM-1/40d | Norlys’ energy business sells natural gas and biogas to residential and business customers. The number of gas customers is continuously declining due to the electrification of Denmark and the roll-out of district heating.

Norlys is not active in chemical manufacturing, controversial weapons or tobacco cultivation and production.

Information about specific business areas

	ESRS ref.	Amount (DKK)
Coal	SBM-1/40d i	0
Oil	SBM-1/40d i	0
Natural gas sales ^{1 2}	SBM-1/40d i	880,400,000
Sale of biogas ^{1 2}	SBM-1/40d i	90,500,000
Manufacture of chemicals	SBM-1/40d ii	0
Controversial weapons	SBM-1/40d iii	0
Tobacco growing or production	SBM-1/40d iv	0

¹Norlys Energy Trading trades in gas – revenue is excluded here as it originates from derivatives and capacities, but not physical gas.
²The figure includes direct sales of gas. The figure does not correspond to that of the annual financial report, as it considers a successful arbitration case and a service scheme.



Norlys’ overall ESG targets

SBM-1/40e | Norlys’ overall sustainability targets are set out in Norlys’ ESG strategy. Several of the targets relate to our business model, directly and indirectly. Our sustainability targets are aimed at ourselves, our customers and members, and Denmark as a whole. The targets are illustrated below.

SBM-1/40f | Elnetselskabet N1 ensures efficient connection and transport of electricity, providing our members with the opportunity to switch to electric cars, replace their gas boiler with a heat pump or install solar panels on their roof. The electrification rate shows the index of N1’s total electricity grid expansion plan monthly that has been completed according to the plan. The electrification rate measures the technical progress of the expansion of the existing electricity grid, as well as the delivery accuracy of the customer-requested expansion. The 10-year expansion plan is N1’s task regarding the electrification of our supply area in connection with the green transition and includes all types of construction tasks (cable laying, new stations, reinvestment and all types of grid connections, both consumption and production). Elnetselskabet’s activities therefore support our society-oriented ESG targets. This part of the business is subject to and complies with applicable rules on functional separation. Consequently, the Norlys Group has no influence on the target.

In addition to our main product, electricity, Norlys’ energy business also sells natural gas and biogas. However, the number of customers for these types of fuel for heating is decreasing as people switch to, for example, heat pumps or district heating. Our product portfolio also includes flexibility services and Corporate Power Purchase Agreements (cPPAs). Flexibility services help

integrate intermittent renewable energy sources such as wind and solar energy, and cPPAs help companies convert their electricity consumption to renewable energy by investing in solar parks and wind farms through Norlys. Except for our gas sales, we help businesses and consumers electrify and increase the share of renewable energy in their consumption.

We have also been very busy this year getting the charging infrastructure ready to support the green transition of the transport sector. In 2024, we commissioned more than 3,000 public charging points, which equates to more than eight new charging points per day. This means that we are already close to fulfilling our ESG target and have exceeded expectations for the strategy period.

A sustainable transformation of Denmark is closely linked to the digitalisation of society for businesses and consumers to develop and make use of new technology. Norlys’ fibre and coax networks ensure good internet connections, and our roll-out in remote areas contributes to ensuring broad coverage throughout Denmark.

Our strong cooperative democracy and ownership model support these long-term investments that future-proof the infrastructure that will support a green and digital Denmark. The long-term investments mean that Norlys contributes both directly and indirectly to the green transition for consumers and businesses by creating conditions and incentives that make it easier for them to reduce their climate footprint. That is why our members, cooperative democracy and ownership model are strongly represented in our sustainability targets.

Norlys' overall ESG targets for the strategy period 2024-2027

						
	E	We make Norlys and all of Denmark green	S	We are a strong community that reaches beyond ourselves	G	We set a new standard among customer-owned companies
Us	We include sustainability in all major decisions	Norlys aims to reach scope 1 and 2 climate neutrality by 2030 and scope 3 climate neutrality by 2040	We develop Norlys as an attractive and inclusive work community	Our employees would recommend Norlys as a workplace to others: index 85 in NOA*	People can trust that Norlys is managed responsibly and transparently	Norlys complies with the Code of Corporate Governance in consumer-owned utilities
Our customers and members	We make it easy to take part in the green transition	50% of our customers say that Norlys makes it easy to go green	We encourage others to be part of the Norlys community	35% of members know about the cooperative ownership	We strengthen ownership democracy and the importance of the Board of Representatives in Norlys	The average attendance rate is 80% at dialogue meetings and meetings in the Board of Representatives
All of Denmark	Enabling the solutions of the future	Norlys' electricity grid company has a total electrification level of 40%	We contribute to creating sustainable communities across Denmark	Norlys' growth pools support 500 initiatives every year	We demonstrate how the cooperative model can create extraordinary value	Norlys has established 3,500 publicly accessible charging points

* Norlys' job satisfaction survey (NOA)

Strategy and sustainability

SBM-1/40g | Sustainability is always at the forefront of our mind and is addressed at all levels of the strategy hierarchy.

In our owner strategy, we define our contribution to a greener and digital Denmark. The goals are to develop and invest in renewable energy and green energy solutions and make it easy for our members and customers to make green choices.

In our group strategy for 2024-2027, sustainability is elevated as a core competence and carbon emission reductions are one of six group-strategic non-financial objectives.

In the commercial strategies, sustainability is about breaking down barriers. We know that most people want to live sustainably but often believe it to be complicated. That is why it is our mission to make it easy, intuitive and attractive to make sustainable choices.

Sustainability is a key element of our infrastructure strategies. Reliable infrastructure is the foundation for the green transition. Our electricity grid transports renewable energy from wind turbines and solar panels to heat pumps and electric cars, while our fibre network increases access to high-speed networks throughout Denmark and enables solutions such as working from home which can reduce the climate impact of transport.

In our ESG strategy, sustainability ambitions are described in further detail and ESG perspectives are integrated

into all significant decisions. We have formulated clear and concrete targets that set the direction for our sustainability efforts.

The SBM3 section describes the connection between Norlys' material ESG impacts, risks and opportunities and our strategies.

However, some of the targets may challenge our business model. This, for example, applies to the target of scope 3 climate neutrality. Norlys sells physical products such as modems and charging stations, and to reach Norlys' climate neutrality target by 2040, the production of our physical products such as modems, charging stations, mobile phones etc. must be climate neutral by 2040. We have only gained a full overview of our scope 3 at the end of 2024. Therefore, we have work ahead of us to create a concrete action plan to reduce our scope 3 emissions, see E1 Climate change on page 36.

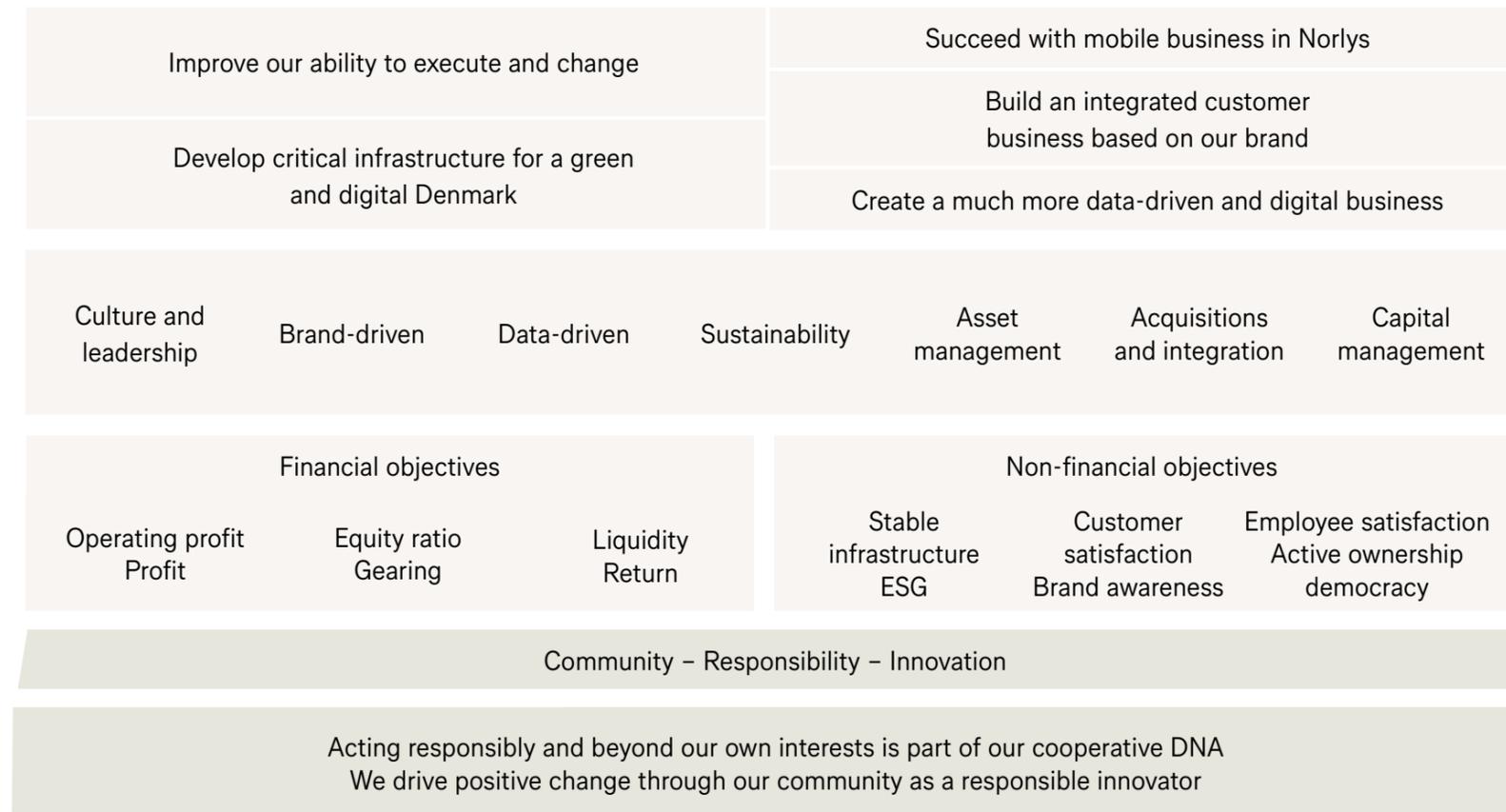
This also applies to the electrification level target. One of the biggest challenges faced by Elnetselskabet N1 will be to expand, maintain and operate the electricity grid in our supply area and at the same time achieve scope 1 and 2 climate neutrality by 2030. Read more about this challenge in E1 Climate change on page 37.

SBM-1/42a-c | Our business model and value chain are illustrated and described on the next page.

SBM-1/43c | The value chain is described in further detail in section E1-1.

Group strategy 2024-2027

Norlys must realise its full potential as a modern and vibrant cooperative by making its end-customer business part of its core on an equal footing with infrastructure to drive the green transition and facilitate digital life in Denmark for our owners and customers.



Business model

Energy

We produce renewable energy with activities in solar, wind, battery solutions, hydrogen, power to heat and biogas.



Norlys' grid company future-proofs and operates Denmark's largest electricity grid.

We are developing a nationwide charging network.

We balance supply and demand through efficient energy trading.



We sell electricity, gas and charging solutions for light and heavy goods transport to businesses, private and public customers.



Norlys' business model combines our role as Denmark's largest energy and telecommunications group with our cooperative DNA. Our goal is to create the greatest possible value for our members, customers, employees and society as a whole.

Telecommunications

We invest long-term in critical infrastructure and create value for our members and for society – made possible by our cooperative ownership model. Our 4,500 employees work tirelessly to develop and connect Denmark with energy and telecommunications solutions.



We develop, future-proof and operate telecommunications infrastructure through our ownership of the largest fibre network in Denmark and co-ownership of the country's largest mobile network.



We support free competition in the fibre market through a collaboration platform for network owners and service providers for the benefit of consumers.

We deliver mobile telephony, internet and TV solutions as well as IoT at competitive prices to businesses, private and public customers.



We work right across the energy and telecommunications value chain – from developing and operating critical infrastructure to delivering solutions that connect people, businesses and communities.

We connect Denmark with our energy, TV, EV charging, mobile and internet solutions

Interests and views of stakeholders

SBM-2

Dialogue is particularly important in a cooperative. Norlys therefore has an obligation towards our members and Board of Representatives to ensure transparency, dialogue and involvement.

We are currently seeing a significant increase in stakeholder awareness and demands for sustainability among our members, our customers and not least authorities. The interests and views of our stakeholders are crucial to our business and so naturally account is taken of their interests in our strategy and business model.

The overview shows Norlys' stakeholders, their involvement, organisation and the purpose and result of the involvement and organisation.

SBM2/45b | Employees, board members, industry organisations and specialist contributions were involved in our double materiality assessment. Read more about stakeholder engagement in GOV-1 on page 9, S1-2 Employee involvement on page 55 S4 on page 72, G1-1 on page 77 and G1-5 on page 80.

Key stakeholders	Organising collaboration	Purpose and results of collaboration	Relationship with strategy and business model
Members	<ul style="list-style-type: none"> Information about election to the Board of Representatives Election of members to the Board of Representatives every four years Norlys may only communicate directly with members in connection with elections to the Board of Representatives 	<ul style="list-style-type: none"> For the members to elect the Board of Representatives to represent them in relation to the development of Norlys Increase awareness of cooperative democracy and increase voter turnout 	See GOV-1/22 on page 9
Board of Representatives	<ul style="list-style-type: none"> Dialogue meetings with the chairmanship and the Executive Board every six months Annual meeting of the Board of Representatives Board of Representatives intranet with news, discussion forum and knowledge bank 	<ul style="list-style-type: none"> Strengthen cooperative democracy Ensure that our members benefit from their ownership of Norlys To lead Norlys in a direction that is aligned with the interests of our members 	See GOV-1/22 on page 9
Employees	<ul style="list-style-type: none"> Employee satisfaction survey (NOA survey) and statutory workplace assessment (APV) People Review Cooperation Committee Health and safety organisation Communication on the intranet 	<ul style="list-style-type: none"> To include employee perspectives and experiences in strategy, activities and decisions Better working conditions, well-being, inclusion, health and safety 	See S1-2 on page 55
Customers	<ul style="list-style-type: none"> Customer panels Qualitative analyses with customers Dialogue through customer support 	<ul style="list-style-type: none"> To ensure that Norlys delivers the products and services that customers demand Understand errors and defects, for example in the event of outages 	See S4 on page 72
Investors	<ul style="list-style-type: none"> Board meetings in relevant companies ESG-ratings Ongoing reporting and dialogue 	<ul style="list-style-type: none"> Increase transparency Improve capital generation Plan for better ESG ratings Norlys Fibernet's GRESB score has improved significantly 	
Suppliers	<ul style="list-style-type: none"> Contractual relationships and supplier due diligence Norlys Kundeselskab has begun the implementation of ESG screening of major suppliers 	<ul style="list-style-type: none"> Compliance with Norlys' Supplier Code of Conduct Eliminate ESG risks in the supplier chain Reduce carbon emissions in our value chain Better social conditions, including working conditions in our value chain 	See G1-1 on pages 78-79
Authorities	<ul style="list-style-type: none"> Direct dialogue with authorities Consultation responses Professional sparring with working committee 	<ul style="list-style-type: none"> Ensure compliance Contribute knowledge and experience in the legislative work 	See G1-5 on pages 80-81
Industry organisations	<ul style="list-style-type: none"> Networking, meetings, committee work, joint consultation responses 	<ul style="list-style-type: none"> Promote the interests of the industry Exchange experiences 	See G1-5 on pages 80-81

Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3

Norlys' material impacts, risks and opportunities are described below, except for circular economy impacts, which according to BP-1 About this report will not be included until the financial year 2025. It describes where the material impacts, risks and opportunities are concentrated in Norlys' business model, their interaction with strategy and business model. For the material impacts, it is stated whether they affect people or the environment, and whether they stem from the strategy and the business model as well as the expected time horizons.

ESG topic	Description of Norlys' material impacts, risks and opportunities	Affected companies	Impact, risks or opportunity	Location value chain	Interaction with strategy and business model(s)	Impact from the strategy or business model	Impact on the environment or people	Time horizon
	SBM 3/48a		SBM 3 E1-SBM3/18	SBM 3/48a SBM 3/48c - iv	SBM 3/48b	SBM 3/48c - ii	SBM 3/48c - i	SBM 3/48c - iii
Climate adaptation E1-1	Climate adaptation of infrastructure Extreme weather events due to climate change pose a risk of destruction of infrastructure and can cause temporary supply disruptions and outages. As a company responsible for critical infrastructure, including electricity grids, fibre networks, coax and TT networks, Norlys faces challenges that can have a potential negative impact on end-users if the infrastructure is not adapted to climate change.	Elnetselskabet N1 Norlys Fibernet Kundeselskabet Norlys	Potential negative impact	The impact potentially affects our infrastructure: the electricity grid, fibre network, charging infrastructure, coax and mobile networks. The impact is therefore important for our own activities, but also downstream towards customers and members who could potentially be affected.	Norlys delivers critical infrastructure that contributes to the transition to a climate-neutral society. Climate proofing is necessary to secure our services and is therefore an increasingly strategic priority as the risk of extreme weather events increases.	The potentially negative climate impacts are not caused by Norlys, but according to our business model we need to secure the infrastructure needed to deliver our services.	Failure to adapt to climate change can lead to disruptions in the supply of electricity, internet services or mobile signal for consumers and communities.	Long
Climate adaptation E1-1	Impact of extreme weather events on critical infrastructure Climate change increases the risk that our infrastructure such as technical hubs and technical installations can be affected by extreme weather events. It can therefore potentially pose a financial risk if the infrastructure is not adapted to climate change.	Elnetselskabet N1 Norlys Fibernet Kundeselskabet Norlys	Potential financial risk - Climate-related physical risk	The impact potentially affects our infrastructure: the electricity grid, fibre network, coax, charging infrastructure and mobile network. The impact is therefore important for our own activities, but also downstream towards customers and members who could potentially be affected.	Norlys delivers critical infrastructure that contributes to securing the transition to a climate-neutral society. Climate proofing is necessary to secure our services and is therefore an increasingly strategic priority as the risk of extreme weather events increases.	Climate-related physical risk	Failure to adapt to climate change can lead to disruptions in the supply of electricity, internet services or mobile signal for consumers and communities.	Long
Climate change mitigation E1-2	Delivery of electricity and connection of renewable energy production A stable and efficient electricity grid is crucial for the green transition, as it enables Elnetselskabet N1's more than 805,000 grid customers to electrify their energy consumption. N1 also connects renewable energy production, helping to ensure that the electrification is increasingly powered by green power. Consequently, N1 has a material positive impact on reducing climate change.	Elnetselskabet N1	Actual positive impact	The impact is associated with activities in Elnetselskabet N1 but affects our downstream value chain towards consumers who depend on electricity from renewable energy sources to be able to transition their own activities.	Operation, maintenance and expansion of electricity grids and rapid connection of renewable energy are the foundation of our business model and thus fully aligned with the strategic priorities of Elnetselskabet N1.	The delivery of electricity is inherent in our business model, and rapid connection of renewable energy production is a strategic priority.	No direct impact	Short
Climate change mitigation E1-2	Expansion of the electricity grid As part of the green transition of the transport, heating and industrial sectors, consumption is shifting from fossil fuels to electricity, resulting in a growing need for transporting electricity. It is therefore essential that Elnetselskabet N1 can operate and expand the electricity grid to meet the growing demand.	Elnetselskabet N1	Potential financial risk	The impact is associated with activities in Elnetselskabet N1, but affects our downstream value chain towards consumers who depend on electricity from renewable energy sources to be able to transition their own activities.	Operation, maintenance and expansion of electricity grids and rapid connection of renewable energy are the foundation of our business model and thus fully aligned with the strategic priorities of Elnetselskabet N1..	Climate-related physical risk	No direct impact	Long

ESG topic	Description of Norlys' material impacts, risks and opportunities	Affected companies	Impact, risks or opportunity	Location value chain	Interaction with strategy and business model(s)	Impact from the strategy or business model	Impact on the environment or people	Time horizon
	SBM 3/48a		SBM 3 E1-SBM3/18	SBM 3/48a SBM 3/48c - iv	SBM 3/48b	SBM 3/48c - ii	SBM 3/48c - i	SBM 3/48c - iii
Climate change mitigation E1-2	Long-term investments in infrastructure Norlys' ownership model as a cooperative supports long-term investments that future-proof the infrastructure that will support a green and digital Denmark. The long-term investments mean that Norlys contributes both directly and indirectly to the green transition for consumers and businesses by creating conditions and incentives that make it easier for them to reduce their climate footprint.	The Norlys Group Elnetselskabet N1 Norlys Fibernet Kundeselskabet Norlys	Actual positive impact	The impact is associated with activities in our electricity grid company, customer company and fibre network as well as subsidiaries, but affects our downstream value chain towards consumers and communities that depend on the infrastructure provided by Norlys to transition their own activities.	Norlys invests strategically in expanding critical infrastructure in line with our business model. In the strategy period 2024-2027, approximately DKK 7 billion will be invested in future-proofing the electricity grid, DKK 3.4 billion in fibre networks and DKK 2.3 billion in charging infrastructure.	Norlys' ownership model enables long-term and socially relevant investments, which is supported strategically in Norlys' ownership strategy.	No direct impact	Long
Energy E1-4	Transport of electricity leads to grid loss When electricity is transported from energy-generation facilities to electricity customers, energy is lost along the way as heat in cables, heat in overhead lines and heat in substations. Elnetselskabet N1, like all other grid companies, therefore experiences grid loss in the transported electricity. The grid loss is a significant source of Norlys' emissions, and because the amount of electricity that Norlys' electricity grid company will have to transport in the coming years will increase, grid loss will – all things being equal – also increase.	Elnetselskabet N1	Actual negative impact	The impact occurs in our own activities in our electricity grid company.	The strategic goal of Elnetselskabet N1 is to reduce the climate impact, including reducing emissions from grid loss. N1 is exploring the possibility of entering a PPA to reduce carbon emissions from grid loss. However, a change in legislation is required to make it possible for N1 to enter a PPA. See G1-5 Political influence and lobbying activities	The grid loss is a consequence of our core activities and stems from our business model	The grid loss results in direct carbon emissions to the environment.	Short
Pollution of air E2-1	Emissions from fossil-powered vans Most of Norlys' vans run on diesel and cover a large geographical area, resulting in many kilometres driven annually. The vans often idle to power generators and tools such as welding equipment. The combustion of diesel emits SOx and NOx, which has a negative impact on air quality.	Elnetselskabet N1 Norlys Fibernet Kundeselskabet Norlys	Actual negative impact	The impact occurs in our own activities in Elnetselskabet N1, Norlys Fibernet and Kundeselskabet Norlys, which all use diesel or petrol-powered vans.	As stated in Norlys' climate targets and action plan in E1 Climate change, strategic efforts are going into converting our car fleet to fossil-free cars.	The impact stems from driving in own operations and a derivative effect of the current business model.	Fossil fuel vans cause direct emissions to the environment.	Short

ESG topic	Description of Norlys' material impacts, risks and opportunities	Affected companies	Impact, risks or opportunity	Location value chain	Interaction with strategy and business model(s)	Impact from the strategy or business model	Impact on the environment or people	Time horizon
	SBM 3/48a		SBM 3 E1-SBM3/18	SBM 3/48a SBM 3/48c - iv	SBM 3/48b	SBM 3/48c - ii	SBM 3/48c - i	SBM 3/48c - iii
Working conditions S1-1	Good and flexible working conditions Our employees are our most important resource, and the conditions offered by Norlys have a major impact on employee well-being and job satisfaction. We offer flexibility and the possibility for our employees to influence their own work, which positively affects our employees' work-life balance and well-being and contributes to a healthy work culture.	The Norlys Group	Actual positive impact	The impact affects our own employees in Norlys' core business.	Employee well-being is crucial to Norlys' business. Employee well-being is therefore a KPI that is actively pursued in the ownership and ESG strategy. See Norlys' overall ESG targets on page 16.	The impact stems from Norlys' business model and strategic priorities.	Good employee conditions have a direct positive impact on people in our own workforce.	Short
Health and safety S1-1	Safety risks for some employee groups Some of Norlys' employees perform tasks related to electricity, coax, mobile and fibre networks as well as warehouse and canteen jobs. Working with excavations, technical installations, large machinery, electricity and high voltage can be risky without the right safety measures and can potentially have a negative impact on these employee groups.	Kundeselskabet Norlys Norlys Fibernet Elnetselskabet N1	Actual negative impact	The impact occurs in our own activities in Elnetselskabet N1, Norlys Fibernet and Kundeselskabet Norlys, all of which have field technicians and warehouse and canteen employees who may be at risk.	Norlys' business model is based on the delivery of infrastructure, including the electricity grid, fibre network, coax and mobile networks. This involves potentially risky work. For this reason, we have a well-established health and safety organisation that works strategically to reduce these risks. See S1-2 Employee involvement on page 55.	The impact stems from activities in our business model.	Potential negative impact on people in own workforce	Short
Equal treatment and equal opportunities for all S1-1	Diversity and inclusion There is a potential risk that lack of diversity and inclusion can lead to an inability to attract and retain employees, damage our reputation and hinder innovation.	The Norlys Group Elnetselskabet N1 Norlys Fibernet Kundeselskabet Norlys Norlys	Potential financial risk	The risk occurs in own activities in those companies that have a material financial impact on the Norlys Group, including the Norlys Group, Elnetselskabet N1, Kundeselskabet Norlys and Norlys Fibernet.	Norlys works strategically to ensure diversity and inclusion. See S1-1 Equal treatment and equal opportunities for all on page 59.	The risk is not associated with our business model.		Short
Safety of consumers and end-users S4	IT security and protection of consumption data There is a risk of third-party impact on our services across the business that can compromise IT systems and consumption data. This may affect the supply of power or charging solutions to customers in all business units, including both private and business customers, industry, public institutions etc. who use our internet services, mobile telephony or network. At the same time, internet and mobile phone users are at risk of being exposed to illegal material that may be harmful.	The Norlys Group	Potential negative impact Entity-specific	The risk of impact stems both from suppliers and own activities in large parts of our business, but the potential negative impact also affects our downstream value chain towards customers, members and society who depend on Norlys providing the necessary security and protection of IT and personal data.	IT security and protection of consumption data is a prerequisite for delivering our many services. IT security is fundamental to our operations and an established part of Norlys' governance and strategic priorities. See S4 Consumers and end-users on page 71.	The potential impact is linked to our business model.	Potential negative impact on customers and members.	Short

ESG topic	Description of Norlys' material impacts, risks and opportunities	Affected companies	Impact, risks or opportunity	Location value chain	Interaction with strategy and business model(s)	Impact from the strategy or business model	Impact on the environment or people	Time horizon
	SBM 3/48a		SBM 3 E1-SBM3/18	SBM 3/48a SBM 3/48c - iv	SBM 3/48b	SBM 3/48c - ii	SBM 3/48c - i	SBM 3/48c - iii
Corporate culture G1-1	<p>Value-based corporate culture Norlys is a cooperative which is guided by three core values: community, responsibility and innovation. These values guide both managers and employees in their daily work and create a community-oriented and innovative corporate culture where people take responsibility for more than themselves. Our value-based leadership has a positive impact on employee satisfaction, well-being and loyalty, which helps retain and attract talented employees.</p>	The Norlys Group Norlys Fibernet Elnetselskabet N1 Kundeselskabet Norlys	Actual positive impact	The impact affects our own employees in Norlys' core business.	<p>The idea behind Norlys' value-based leadership is grounded in our ownership strategy and operationalised in our business through our management culture.</p> <p>See G1-1 Corporate culture and business conduct on page 77.</p>	The impact is enabled by our cooperative model and supported by strategic prioritisation.	Actual positive impact on people in our own workforce	Short
Protection of whistleblowers G1-2	<p>Protection of whistleblowers To promote good business conduct, it is important that employees feel safe raising concerns about inappropriate behaviour. Protection of whistleblowers is therefore crucial to ensure that employees and other relevant parties feel confident about reporting business fraud, harassment and similar incidents. This helps Norlys maintain a responsible and healthy corporate culture. However, lack of protection can have a negative impact on our corporate culture.</p>	The Norlys Group	Actual negative impact	Whistleblower channels and protection are relevant in all parts of the Norlys Group and therefore affect both upstream, downstream and our own activities.	<p>Whistleblower systems are integrated into our group governance structure.</p> <p>See G1-1 Corporate culture and business conduct on page 77.</p>	The impact is not specifically linked to our business model.	Potential impact on people can occur in all parts of the value chain.	Short
Political influence and lobbying activities G1-5	<p>Political influence and lobbying activities A major player in critical industries, Norlys represents over 800,000 members. Our status as a cooperative gives us an important voice in society. We contribute knowledge and experience in digitalisation and electrification through political influence and lobbying activities as well as dialogue with decision-makers.</p> <p>Due to the functional separation, the interests of Norlys' electricity grid company are managed separately from the interests of the rest of the Group.</p>	The Norlys Group Elnetselskabet N1 Norlys Fibernet Kundeselskabet Norlys	Actual positive impact	The impact is related to our role as Denmark's largest member-owned integrated energy and telecommunications group, and especially our business areas in Elnetselskabet N1, Norlys Fibernet and Kundeselskabet Norlys. The impact affects our downstream value chain, including consumers, business partners and society.	<p>Political influence and lobbying activities are a strategic priority. Norlys' political influence and lobbying activities are handled by the Public Affairs & Sustainability department, which executes our PA strategy. The work with influence and lobbying activities in Elnetselskabet N1 is handled by the Regulation department.</p> <p>See G1-5 Political influence and lobbying activities on page 80.</p>	The impact is enabled by our cooperative model and supported by strategic prioritisation.	No direct impact on people or the environment	Short

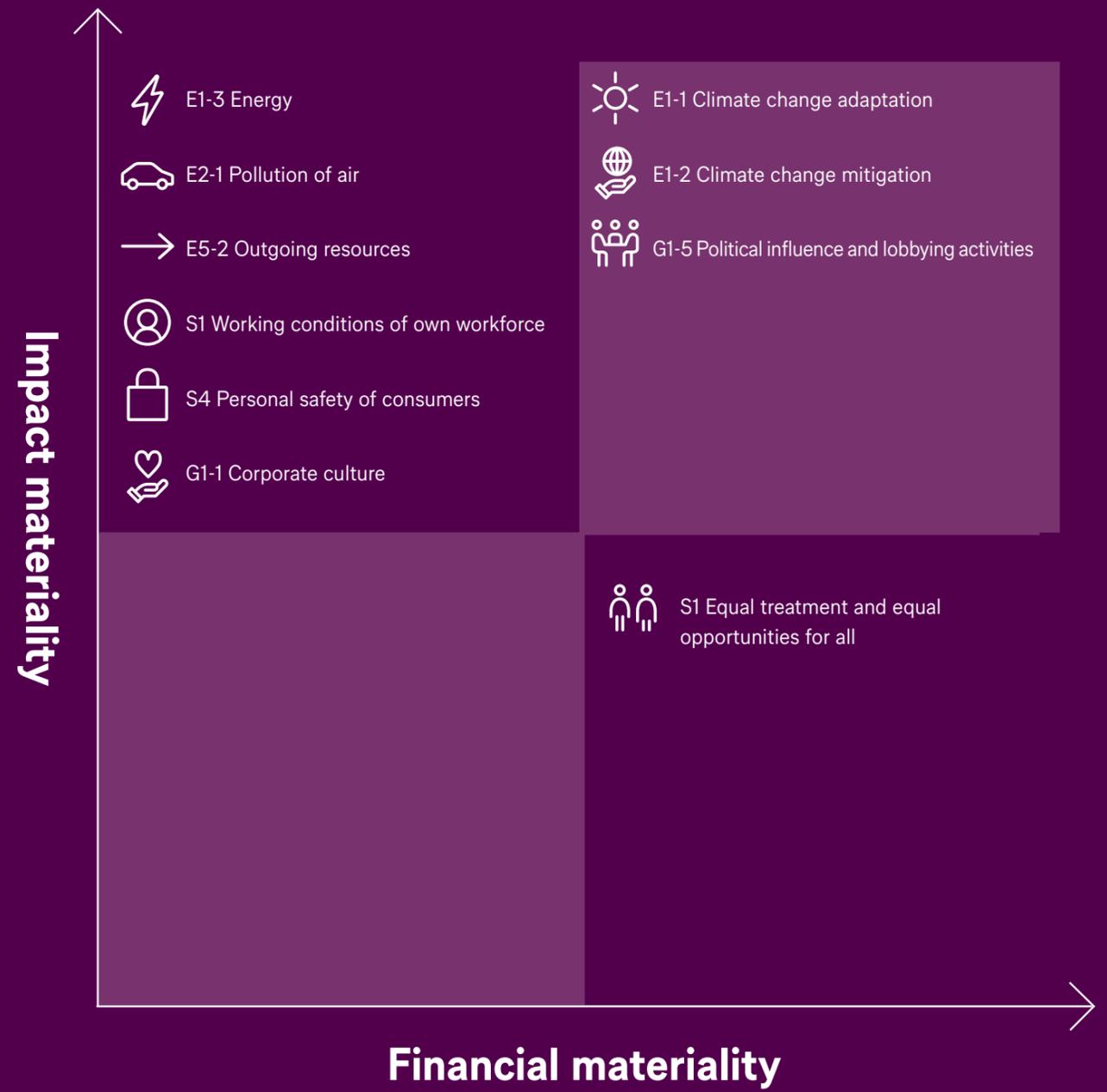
ESG topic	Description of Norlys' material impacts, risks and opportunities	Affected companies	Impact, risks or opportunity	Location value chain	Interaction with strategy and business model(s)	Impact from the strategy or business model	Impact on the environment or people	Time horizon
	SBM 3/48a		SBM 3 E1-SBM3/18	SBM 3/48a SBM 3/48c - iv	SBM 3/48b	SBM 3/48c - ii	SBM 3/48c - i	SBM 3/48c - iii
Political influence and lobbying activities G1-5	<p>Political focus on critical infrastructure Norlys provides critical infrastructure and operates in highly regulated industries. Many of Norlys' activities are therefore subject to strict regulatory requirements, and changing political conditions can affect the company's ability to invest in the green transition and digitalisation of Denmark. Ongoing political influence and lobbying activities are crucial to ensure stable and predictable framework conditions and reduce the risks associated with changing political decisions.</p> <p>Due to the functional separation, the interests of Norlys' electricity grid company are managed separately from the interests of the rest of the Group.</p>	The Norlys Group Elnetselskabet N1 Norlys Fibernet Kundeselskabet Norlys	Potential financial risk	The impact affects our own activities – especially the critical infrastructure and, by extension, our business areas in Elnetselskabet N1, Norlys Fibernet and Kundeselskabet Norlys, whose financial conditions may be significantly affected by political regulation.	<p>Political influence and lobbying activities are a strategic priority. Norlys' political influence and lobbying activities are handled by the Public Affairs & Sustainability department, which executes our public affairs strategy. The work with influence and lobbying activities in Elnetselskabet N1 is handled by the Regulation & Security department.</p> <p>See G1-5 Political influence and lobbying activities on page 80.</p>			Short

- S1-SBM3/14a-d See description in the table above (SBM-3/48a)
- S1-SBM3/14e No material impact on employees has been identified as a result of transition plans
- S1-SBM3/14f Norlys does not have activities with a significant risk of forced labour
- S1-SBM3/14g Norlys does not have activities with a significant risk of child labour
- S1-SBM3/15 Norlys keeps statistics on which employee groups are at risk of work accidents. Read more in section S1-1 Health and safety on page 63
- S1-SBM3/16 For specific employee groups exposed to impacts, see the description in the table above under S1-1 Health and safety on page 22.

Description of the processes to identify and assess material impacts, risks and opportunities

IRO-1

IRO-1/51 | In 2024, Norlys revisited its double materiality assessment (in the following referred to as 'DMA') according to the guidelines of the European Sustainability Reporting Standards (ESRS). The DMA was performed at group level and included all legal entities as described in BP-1 General basis for preparation of sustainability statements. This resulted in a complete and updated DMA. As described in the introductory section of this report, reporting is voluntary. As the DVV was conducted in the third and fourth quarter 2024, newly identified material issues are not included in this report to ensure that we can provide the necessary data quality. These issues will be included in the 2025 reporting.



Process

1

Review and update

A review of the 2023 material was conducted to identify changes in Norlys' activities that may affect the double materiality assessment. The review included organisational structure, business practices, value chains including geographical mapping, thresholds and input from internal and external contributors.

2

Identification of impacts, risks and opportunities

Where no changes in business activities have been identified, impacts, risks and opportunities are carried forward from 2023. However, in 2024, the impacts, risks and opportunities carried forward were rewritten and consolidated based on the experience from last year and recommendations from our audit partners. Changes in the business, new business areas or conditions, such as the acquisition of Telia Mobil Danmark, have resulted in the identification of new impacts, risks and opportunities. This was done by combining Telia Company's double materiality assessment with interviews with employees from Telia Mobil Danmark. The same methodology was used as for the other companies in the Group.

3

Assessment of impacts, risks and opportunities

Impacts, risks and opportunities have been assessed internally based on a combination of in-house expertise and research. In 2024, new and significantly changed impacts, risks and opportunities were reassessed. Rewritten and consolidated impacts, risks and opportunities from 2024 are only reassessed if the changes result in a significant adjustment of content.

4

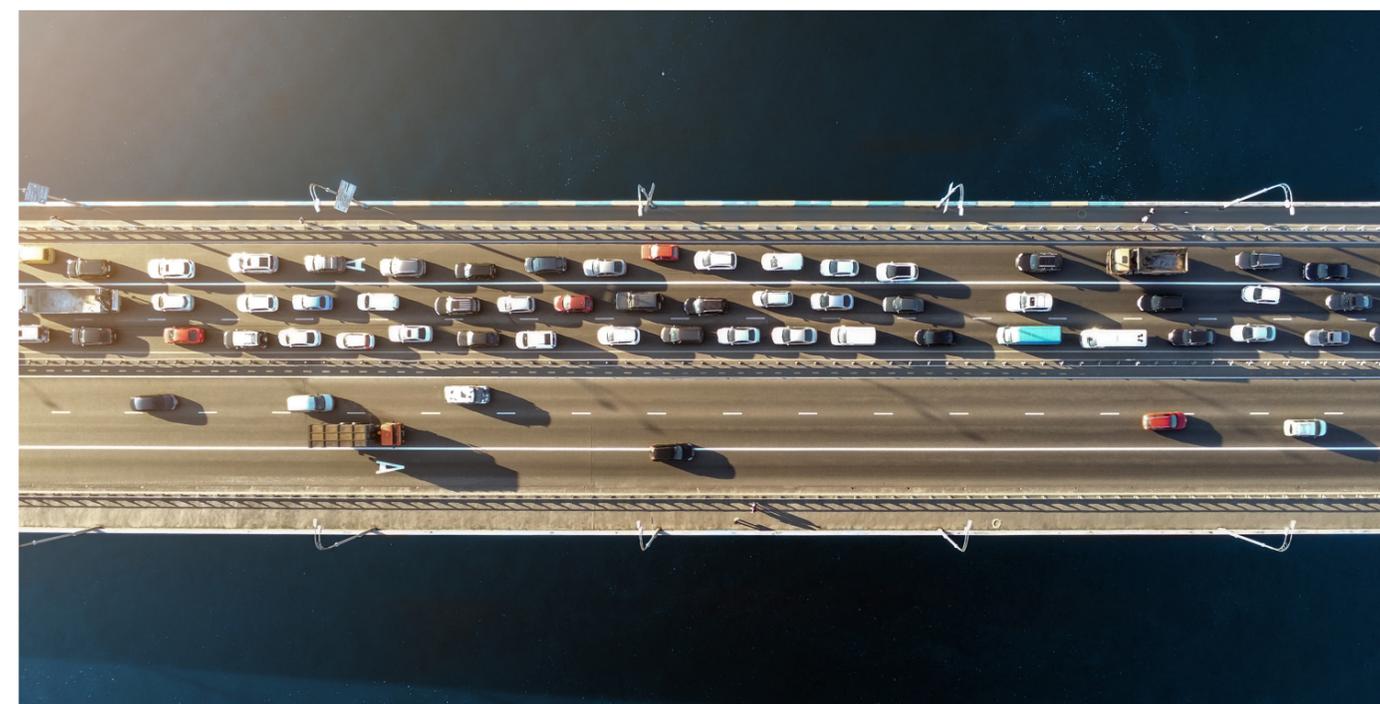
Validation

The result has been reviewed with the ESG Steering Committee. This ensures that the results of the analysis represent the activities of the entire Group. The results have subsequently been reviewed by the Risk and Audit Committee and the Board of Directors of Norlys a.m.b.a.

5

Documentation

The overall materiality assessment, including impacts, risks and opportunities, is documented and includes value chains for each of Norlys' business components. In 2024, special emphasis was placed on strengthening documentation to ensure robustness and support Norlys' ongoing sustainability efforts.



Process description

IRO-1/53a | The process follows the updated implementation guidance from EFRAG* published on 24 May 2024.

The process consists of five steps:

- 1) Review and update
- 2) Identification of impacts, risks and opportunities
- 3) Assessment of impacts, risks and opportunities
- 4) Validation
- 5) Documentation

The work builds on the methodology and process applied in 2023 but has been adjusted based on experience and guidance from EFRAG. In the process, Telia Mobil Danmark has been fully integrated into the double materiality assessment on the same terms as the other companies. Due to the diversity of the Group's activities, impacts, risks and opportunities are identified at company level but assessed in a group context.

Key assumptions in the process

The analysis is a continuous process as it builds on double materiality assessments from previous years. It is assumed that no material new impacts, risks and opportunities will arise unless there are changes in the underlying business model, value chain and/or activities. The assessment performed is a snapshot based on Norlys' knowledge at the time. The assessment is based on the best knowledge of employees and key stakeholders, and the results are subsequently reviewed by the ESG team before final approval by management.

IRO-1/53b | Norlys is committed to reviewing the double materiality assessment annually. Organisational anchoring is continuously strengthened across Norlys, with the ESG organisation responsible for the periodic review. See the process description in IRO-1/53a.

Value chain, geography and business model

IRO-1/53b-i/ii | Identification, assessment, prioritisation and monitoring of impacts, risks and opportunities follow a consistent

process that includes value chain and geographical mapping and business model descriptions.

Stakeholder consultation

IRO-1/53b-iii | The analysis included stakeholder consultation and perspectives from external experts. Internal interviews validate and complement the identification of impacts, risks and opportunities.

Scoring methodology

IRO-1/53b-iv | Norlys uses an objective scoring methodology based on ESRS1 that ensures consistent treatment of all impacts, risks and opportunities. There is a fixed threshold for impact and financial materiality.

The thresholds are designed to prioritise consequence over probability. The financial materiality threshold is assessed annually in collaboration with Group Finance and follows the financial thresholds used in the Group's risk management framework.

Financial materiality reflects financial impact and likelihood.

Impacts are assessed based on scale, scope, irreversibility and likelihood and classified as positive/negative and actual/potential.

A sustainability issue is considered material if an impact, risk and opportunity exceeds the defined threshold for either an impact or a financial impact.

IRO-1/53c-i | See description in IRO-1/53b-iv

IRO-1/53c-ii | As stated in sections SBM-1 and SBM-3, Norlys' financial sustainability risks are linked to our business activities and therefore integrated into our existing risk management and/or management treatment across the business.

Decision-making process and control procedures

IRO-1/53d

- A critical decision in the process was the selection of contributors to identify and assess impacts, risks and opportunities. The selection was based on their professional expertise and knowledge of the business.
- The assessments were conducted in accordance with European Sustainability Reporting Standards. Software was used to ensure consistency in the documentation and assessment.
- Impact assessments were based on the affected stakeholders. All impacts, risks and opportunities are documented with a description, scoring and the rationale behind the score to create transparency and reproducibility. All assessments were performed on the basis of the inherent risk and did not include mitigating actions.
- Data is continuously checked by ESG Data Officers and Group ESG.

Risk management process

IRO-1/53e | As our business model is associated with several impacts, risks and opportunities, see page 18, they are subject to continuous risk management. The statutory methodology of the double materiality assessment is new and as a result the process is not yet integrated into the company's risk management, but we are working on increasing integration going forward.

Management of potential ESG opportunities

IRO-1/53f | Work is ongoing to firmly anchor ESG across Norlys, including a link between strategic priorities and the double materiality assessment. If ESG opportunities are identified in the organisation, these can be presented to the relevant leadership team, the ESG Steering Committee or the Executive Board.

Changes in methodology

IRO-1/53g | See the process description in IRO-1/53a for changes in relation to the previous reporting period. The materiality assessment is expected to be revised in the third quarter 2025.

Topical information

In connection with the updated materiality assessment, climate change (E1), pollution (E2), water and marine resources (E3), biodiversity and ecosystems (E4) as well as resource use and circular economy (E5) have been addressed in accordance with the other standards and following the same process as described in IRO-1. The following should be seen as complementary to this. All assessments are based on the best estimate, knowledge and professional expertise of internal representatives and have subsequently been validated by management.

Climate change

E1/20 | Climate change has been assessed based on data from the company's carbon accounting in accordance with the GHG Protocol (scope 1, 2 and 3), see the description in E1 Climate change on page 30. Transition risk and potential future emissions have been assessed through dialogue with stakeholders from the portfolio companies responsible for the main emissions. Focus has been on emissions related to future capital investments and operations because of the increased electrification of society and Norlys' opportunities and risks in this transition. Climate scenarios are not used in the process.

Physical climate risks are assessed based on internal knowledge and historical data on incidents, consequences and remediation costs. The same time horizons have been used as for the remainder of the process, which is not related to asset lifetime. Geocoordinates and climate scenarios have not been used in the process.

Pollution

E2/11 | Norlys' pollution-related impacts, risks and opportunities are identified and assessed with a focus on air, water and soil pollution, including microplastics and substances of concern. The analysis is based on the activities Norlys is engaged in and is not location-specific. This is due to the nature of Norlys' infrastructure, which is not geographically centred but extends over large areas. The assessments are based on the frequency of the activities in question.

The Environmental Footprint method has not been used as part of

the assessment, and there has been no consultation with affected stakeholders.

Water and marine resources

E3/81 | Our assessment covers water consumption and marine resources. Impacts related to water and marine resources have been assessed with a focus on the activities of Norlys and its value chain.

Marine resources have been assessed based on the company's relation to Karlsgårde Lake. The Water Framework Directive has not been used in the assessment. No impacts, risks or opportunities related to other parts of the business and its value chain have been identified.

Water consumption is assessed based on the company's actual consumption.

Biodiversity and ecosystem

E4/17 | No specific assessment tools other than the ESRS guidelines have been used in the assessment. See IRO-1.

Resource use and circular economy

E5/11 | Resource use and circular economy is assessed based on Norlys' direct and indirect contribution to resource use and generated waste. The assessment is based on internal data covering the entire Group. Priority is given to materials that either occur in large quantities and/or are scarce resources.

The assessment takes into account the materials' use in Norlys' facilitation of consumer products and electronics as well as long-term infrastructure solutions. This includes their environmental impact, circularity and waste generation.

Business conduct

G1/6 | No parameters other than those described in IRO-1 have been used.

List of disclosure requirements

IRO/2-56 See page 2.

Climate and environment



Norlys' path to climate neutrality

Norlys is committed to becoming a climate neutral company. At the same time, we must not forget that we can make the biggest difference by laying the foundation for the green transition of society. That is why Norlys in 2024 worked hard to drive the green transition in Denmark through electrification, renewable energy and energy efficiency, all with the ambition to contribute to a greener society.

To support the increasing electrification, we have installed over 3,000 new public charging points and we are involved in agreements for five new HGV charging hubs. We have also launched new high-speed charging hubs designed as modern meeting places with green spaces, refreshments and interactive learning activities. Elnetselskabet N1 has also strengthened grid resilience through modernisation and optimisation of the infrastructure to reduce the increase in grid loss. The electrification of our own vehicle fleet once again won us a Green Fleet Award.

Through Norlys Energy Trading's Energy ResearchLab, we have partnered with Aalborg University to develop energy storage solutions that ensure better utilisation of renewable energy sources. We have also launched Corporate Power Purchase Agreements (cPPAs) that allow companies to invest in new renewable energy and secure power from renewable energy sources at stable prices.

The following section provides insight into our achievements, our key initiatives and the challenges we still face in working towards scope 1 and 2 climate neutrality by 2030.



Highlights 2024



Launch of cPPAs for companies

Norlys launched Corporate Power Purchase Agreements (cPPAs), where several companies jointly invest in the development of new solar and wind farms and secure renewable energy at a fixed, predictable price. With the cPPAs, companies contribute to increasing the amount of renewable energy in the Danish electricity grid.



Towards a nationwide charging network

Norlys installed more than 3,000 new public charging points across Denmark, equivalent to eight per day.



Electrification of HGV transport

Norlys established strategic partnerships with DFDS and MAN Truck & Bus to develop the charging infrastructure for their growing fleet of electric trucks in Denmark. Agreements were signed for the establishment of the first five HGV charging hubs. Four of these charging hubs were initiated by private actors without public support – and Norlys has agreements covering all five.



More renewable energy to cover Norlys' consumption

In 2024, Norlys secured the construction of a solar and wind farm to cover the majority of power consumed by Norlys Digital, Norlys Fibernet and Telia Mobil Danmark. The power comes from a long-term power purchase agreement (cPPA), which we expect to deliver the first power to the grid in 2026.



New intelligent battery park

Norlys established an intelligent battery park with 30 units in collaboration with XOLTA, with the aim to ensure better utilisation of green energy through flexible storage and contribute to grid balancing.



Balancing of energy consumption in Telia's masts

Telia Mobil Danmark is continuously working to reduce energy consumption in their mobile network through 5G modernisation, which makes data transfer more energy efficient, and intelligent capacity management. Customers' growing need for data usage increases energy consumption, which Telia continuously tries to balance through a combination of increased capacity and focus on energy efficiency.

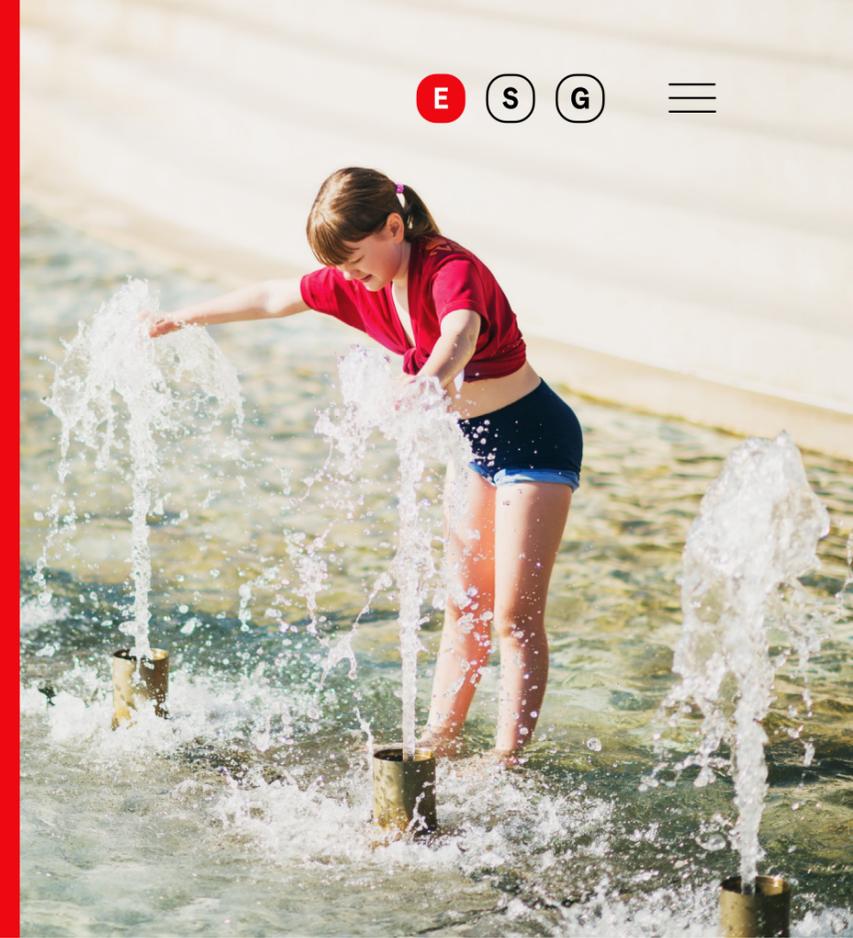


E1 Climate change



Norlys' climate targets

Climate neutral in scope 1 and 2 by 2030
Climate neutral in scope 3 by 2040



E1-1

Transition plan for climate change mitigation

E1-1/14 | Climate change is the most pressing challenge of our time. Businesses play a crucial role in providing the green solutions that help us reach the goals of the Paris Agreement. As an energy company, investor in solar and wind and owner of a central electricity grid, Norlys has both the responsibility and the opportunity to lead the way which is why we set ambitious climate targets, supported by concrete actions here and now.

E1-1/16a | Norlys' climate targets must live up to the Paris Agreement, and we have therefore committed to the Science Based Targets initiative (SBTi). Norlys expects to submit climate targets for validation in 2025.

Climate initiatives

E1-1/16b | Norlys' emissions are described in more detail under E1-4, but a brief overview is provided here. In scope 1, SF6 gas from the substations is the largest source of emissions. In scope 2, grid loss are the largest source of emissions, while scope 3 largely consists of sold electricity and sold gas, which are becoming less carbon-intensive year by year. Norlys' climate initiatives are described in section E1-3.

Norlys' largest emissions occur in scope 3.

Scope 1
7,073 tonnes

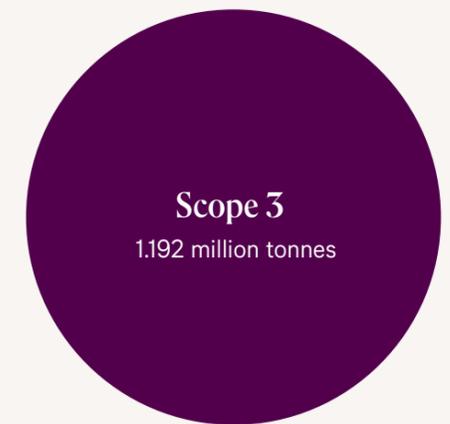


Scope 2
58,503 tonnes



Climate neutral 2030

Scope 3
1.192 million tonnes

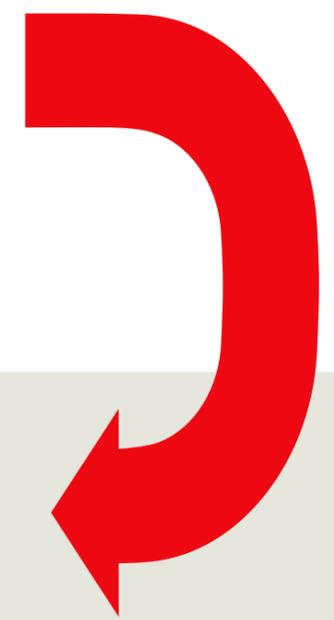


Climate neutral 2040



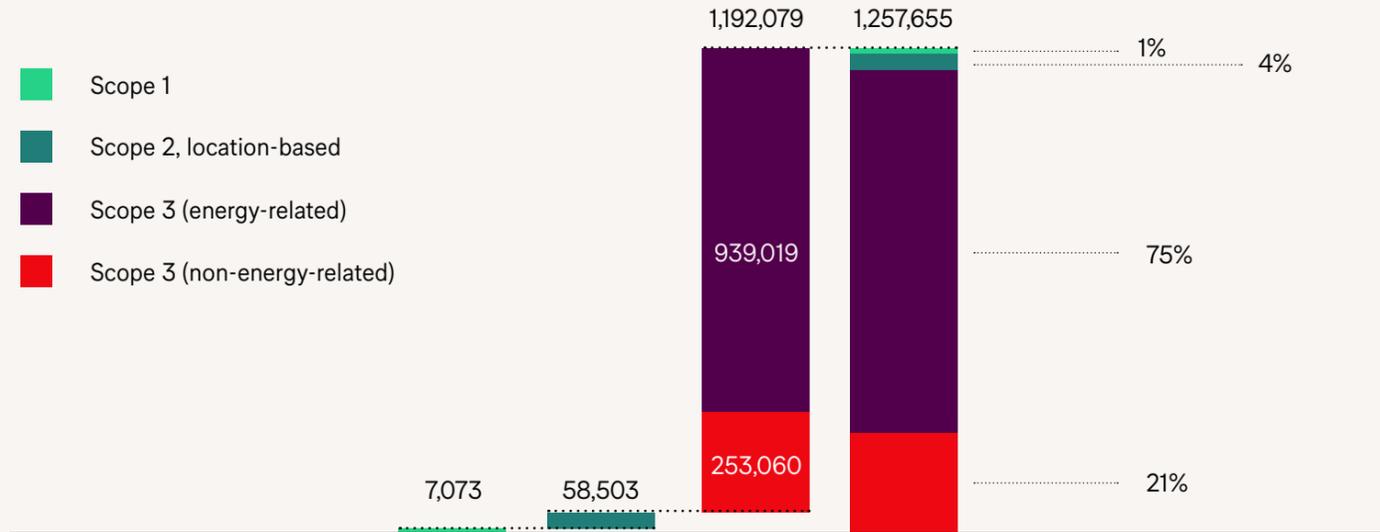
							Scope 3 Upstream activities Suppliers
Procurement of goods and services	Capital goods	Fuel and energy-related activities	Transport and distribution	Waste	Business travel	Employee commuting	
144,242 tonnes	53,801 tonnes	514,242 tonnes	2,860 tonnes	69 tonnes	3,946 tonnes	6,389 tonnes	

Scope 1				NORLYS					Scope 2	
Petrol	Diesel	SF6 gas	Natural gas	Grid loss	Buildings	Other electricity consumption	District heating	Electricity for electric cars		
116 tonnes	3,173 tonnes	3,327 tonnes	124 tonnes	52,016 tonnes	1,050 tonnes	3,569 tonnes	395 tonnes	286 tonnes		

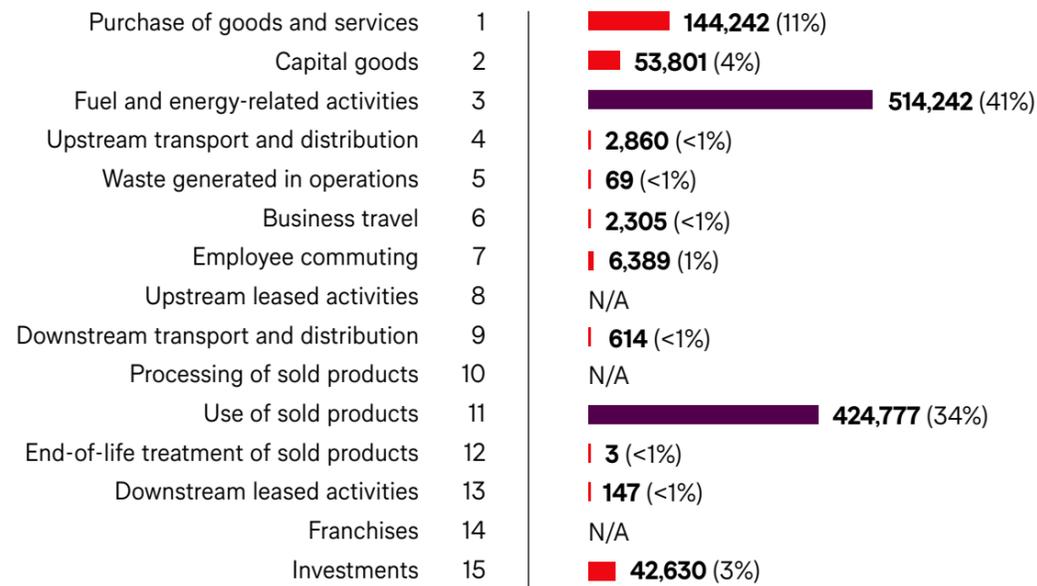


Scope 3 Downstream activities Customers						
		Transport and distribution	Use of sold products	End-of-life treatment of sold products	Downstream leased assets	Investments
		614 tonnes	424,777 tonnes	3 tonnes	147 tonnes	42,630 tonnes

Norlys' greenhouse gas emissions, 2024 (tCO₂e)



Breakdown of scope 3 by category (tCO₂e)



Sources of Norlys' emissions

Scope	Category	Description
1	Company buildings	Gas, oil and refrigerants for heating and cooling buildings
	Company vehicles	Fuels used in owned and leased company vehicles
	Substations	Leakage of SF6 gases from substations
2	Electricity and heating	Purchased electricity for company facilities and electric cars, purchased heating for buildings and N1 distribution loss.
3 – Upstream	1. Purchased goods and services	All purchased goods and services (OpEx) not included in other categories (e.g. transformers, cables, consultants, office cleaning).
	2. Capital goods	All CapEx-related purchases, i.e. major purchases that are recorded on the balance sheet and depreciated (for example construction of new buildings).
	3. Fuel and energy-related	Upstream emissions (i.e. extraction, processing and distribution) from consumed energy (scope 1 and 2) and electricity sold to customers.
	4. Transport and distribution	Upstream transport of goods and downstream transport of goods paid by Norlys.
	5. Waste generated through operations	All waste generated in Norlys' operations (handled by Marius Pedersen or Hals Metal).
	6. Business travel	Business-related travel activities (e.g. flights, taxis, hotel stays), excluding employee commuting and company vehicles.
	7. Employee commuting	Employee commuting in vehicles not owned or leased by Norlys (e.g. employees' own vehicles or public transport).
3 – Downstream	9. Transport	Transport not paid by Norlys of goods to customers.
	11. Use of sold products	Gas sold to customers and emissions from sold products throughout the lifetime of the product (e.g. routers, stand-by consumption from EV charging stations).
	12. End-of-life treatment of sold products	End-of-life treatment of all physical products sold (such as TV hardware).
	13. Leased assets	Energy consumed in buildings owned by Norlys but leased to others.
	15. Investments	Scope 1-3 emissions from financial investments and strategic partnerships outside Norlys' operational control (e.g. RAH or SEF).

Locked-in emissions

E1-1 16d | Norlys' climate targets are challenged by the so-called 'locked-in emissions', which are difficult to reduce.

Locked-in emissions in Norlys	Description	Actions	Risk to climate targets	Size
Vans (Elnetselskabet N1 and Fibernet)	Norlys' and N1's fleet of vans is to a high degree fuelled by diesel. All passenger cars in the company car scheme will soon be replaced, but replacing fossil-powered vans with electric vans has proven to be more difficult. Many of the vans are heavily loaded and need to have a relatively high traction capability. This places high demands on the vehicles, posing a challenge to the transition to electric vans.	Norlys Fibernet has conducted trials with electric vans. N1 has initiated an analysis to see if some of the transport needs can be covered by electric vans. The results of this analysis will form the basis for market dialogue, tenders and future leasing agreements.	If the car fleet continues to run on diesel in 2030, it will jeopardise Norlys' climate targets.	Emissions from diesel accounted for 3,173 tonnes in 2024, corresponding to a reduction of 25%.
SF6 gas (Elnetselskabet N1)	The thousands of SF6-containing switches in N1's transformers have an estimated life of 40 years. Nowadays, most SF6-containing switches are replaced with SF6-free switches in the event of failure.	Around 70 switches are replaced per year and at that rate, SF6 gas is expected to be phased out by 2064. In 2025, N1 will draw up a reduction plan that can form the basis for a potentially faster phase-out of SF6 gas.	SF6 gas will pose a challenge to Norlys' 2030 climate neutrality targets and will likely need to be addressed by means of carbon offsetting.	Emissions from SF6 gas accounted for 3,327 tonnes in 2024, an 85% increase. The SF6 gas inventory has improved data quality from 2023 to 2024, which mainly explains the increase in 2024 figures.
Purchases (Kundeselskabet Norlys, Elnetselskabet N1 and Norlys Fibernet)	Norlys' companies purchase billions of DKK worth of goods every year, which emit greenhouse gases during production, transport and installation. N1 in particular will have to significantly expand the electricity grid in the coming years, involving excavation work with heavy machinery and the purchase of high carbon-footprint materials.	Kundeselskabet Norlys, N1 and Norlys Fibernet introduced climate considerations as a fixed criterion in most major tenders in 2024. The evaluation criteria vary but will typically be that the supplier has climate targets in place that live up to the Paris Agreement and LCA/EPD at product level.	Purchases of goods and services will pose a challenge to our climate targets if climate-neutral products are not available.	Purchases (cat. 3.1 and 3.2) accounted at 198,043 tonnes of CO ₂ e in 2024.



E1-1/16g | Norlys is not excluded from Paris-aligned EU benchmarks.

E1-1/16h | Information on how climate change actions are incorporated into Norlys' strategy is described in sections SBM-1/40 and SBM-1/48.

E1-1/16i | The transition plan has not yet been approved by Norlys' supreme governing body as the full analysis of Norlys' scope 3 emissions was only completed in late 2024.

E1-1/16 | Progress on the implementation of a transition plan can be seen in section E1-3.

Interaction with strategy and business model(s)

E1-SBM-3/19b | Norlys' strategy and business model contribute to the fight against climate change as described in the section 'General information'.

Climate-related scenario analysis

E1-SBM-3/19a-c | Norlys has not yet performed a full analysis of the company's resilience to climate change. However, our electricity grid company has prepared contingency plans with a timeframe of 50-60 years. The plans take into account climate-related events such as flooding, dike breaches, high and low water levels, heat waves, freezing of inland Danish waters and IT disruptions caused by various events. The contingency plans are updated on a regular basis to ensure resilience and relevance.

Norlys plans to perform a scenario analysis in accordance with the TCFD framework.

Policies related to climate change mitigation and adaptation

E1-2

E1-2/25 | Norlys has a number of policies covering climate change, climate adaptations, energy efficiency and the expansion of renewable energy.

Norlys' climate, energy and environment policy sets the direction for how we reduce our climate footprint, promote energy efficiency and expand renewable energy.

- Climate change: Norlys' goal of becoming climate-neutral (scope 1 and 2 by 2030 and scope 3 by 2040) addresses climate change and has been approved by our Board of Directors.
- Climate adaptation: Elnetselskabet N1's contingency plans address climate adaptation, including risks associated with flooding. Norlys does not have similar plans in place for the remaining business areas.
- Energy efficiency: Norlys Fibernet has defined concrete energy efficiency goals and aims to reduce energy consumption per customer by 11.9% in the 2024-2027 period.
- Installation of renewable energy: As part of our ownership strategy, we are committed to developing and promoting renewable energy. Norlys owns approximately 49.9% of Eurowind Energy, which is behind the establishment of land-based solar and wind farms.

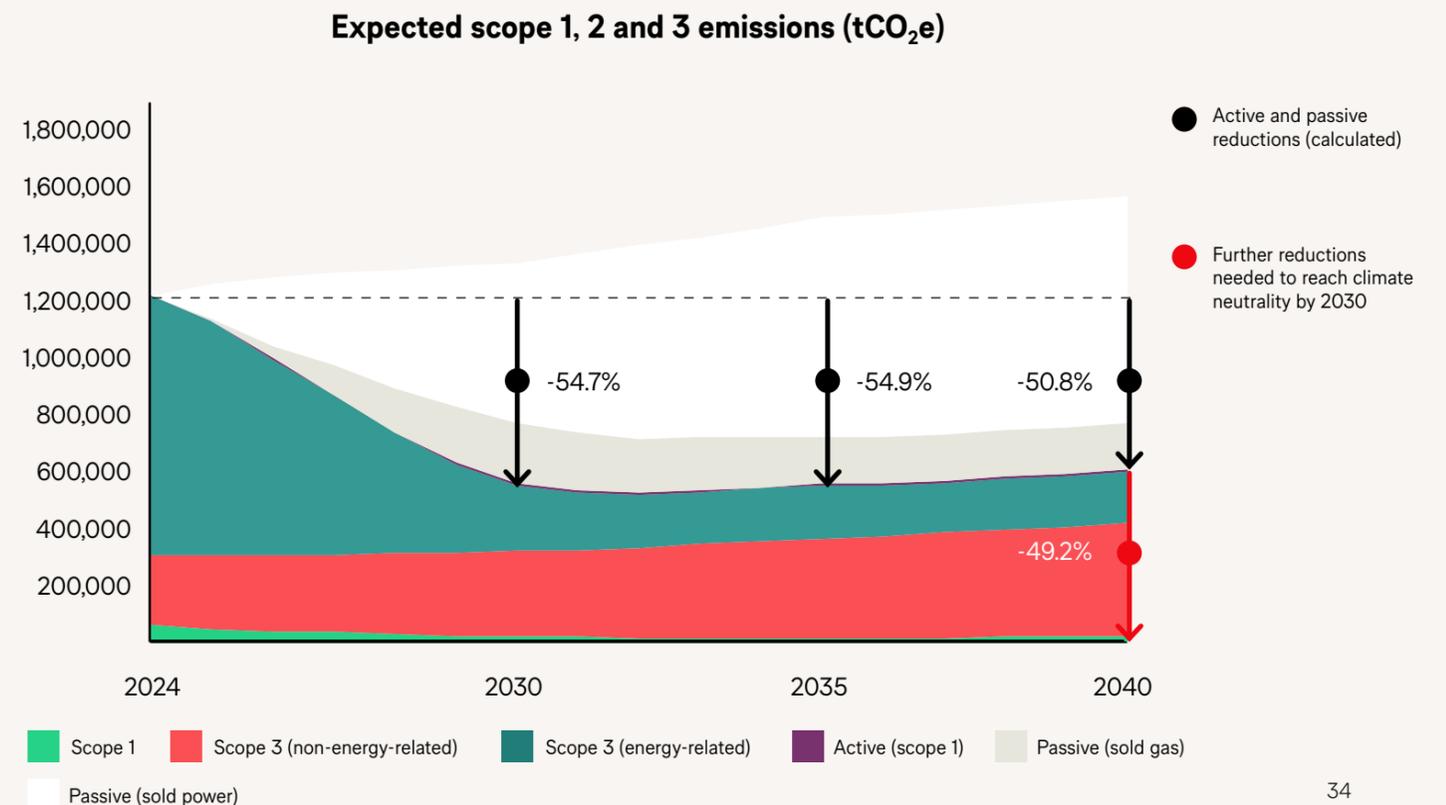
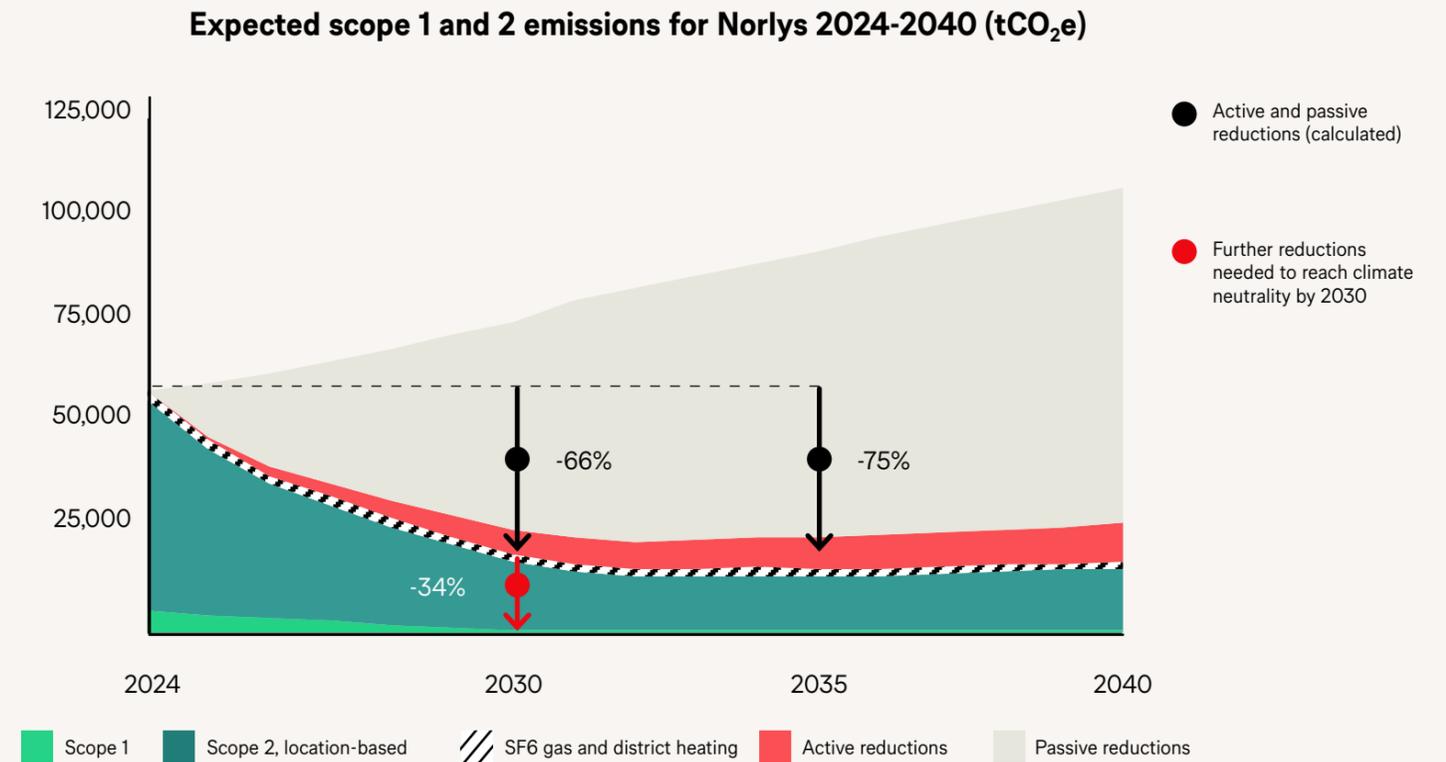
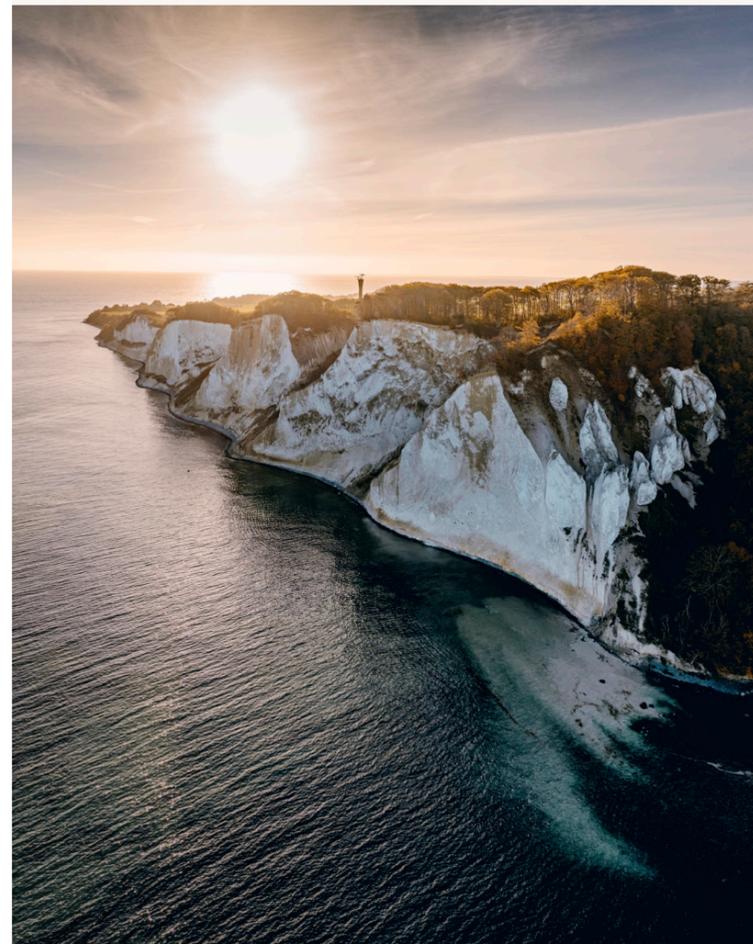
In 2024, the policy described covered all wholly owned companies in the Norlys Group and Norlys Fibernet. This means that the policy covered the companies in which material impacts and risks related to climate change have been identified, see section SBM-3. Telia Mobil Danmark is covered by the policy as at 1 January 2025.

Actions and resources in relation to climate change policies

E1-3

E1-3 | Norlys' scope 1 and 2 emissions are expected to decline by approximately 66% by 2030. We have therefore launched a number of initiatives aimed at further reducing our climate impact.

Norlys expects to reduce scope 1-3 emissions by approximately 50% by 2040. Reducing the last 50% requires efforts from active reductions, supported by passive reductions. Offsetting may also help achieve Norlys' climate neutrality target.



Actions and resources in relation to climate change policies

E1-3 29a | Norlys has launched the following initiatives to reach our climate targets. The middle column (E1-1/16j) describes the development from 2023 to 2024.

Scope 1	Development in 2024	CapEx / OpEx	Expected development
E1-1/34f	E1-1/16j	E1-1 16c and E1-3 29b	
Passenger cars Switch to electric cars in the company car scheme	Emissions from petrol consumption have declined by 71% from 377 tonnes to 116 tonnes of CO ₂ e.	CapEx: None OpEx: Fewer savings as electric cars are cheaper to run	All cars in the passenger car category are expected to be converted shortly. No further action.
Vans Switch to electric vans for technicians	Emissions from diesel consumption have declined by 37% from 4,218 tonnes to 3,173 tonnes of CO ₂ e.	CapEx: None OpEx: Low-medium, as electric vans are cheaper to run than diesel vans. However, the savings may be offset by reduced efficiency.	All vans are expected to be converted around 2030.
SF6 gas	Emissions from SF6 gas have increased by 85% from 1,793 tonnes to 3,327 tonnes of CO ₂ e, primarily due to better data insight.	CapEx: High, as SF6-free switches are considerably more expensive and may require more space. OpEx: None	SF6 gas is prohibitively expensive to phase out and will therefore emit greenhouse gases even after Norlys' climate neutrality target has been reached and will therefore have to be offset. See also locked-in emissions.

Scope 2	Development in 2024	CapEx / OpEx	Expected development
E1-1/34f	E1-1/16j	E1-1 16c and E1-3 29b	
Grid loss in N1	Declined by 1.4% from 52,771 tonnes to 52,016 tonnes of CO ₂ e.	CapEx: N/A OpEx: N/A	N1 is continuously working to reduce grid loss, despite an increase in the volumes of transported electricity. N1 is exploring the possibility of entering into a PPA to reduce carbon emissions from grid loss. However, this requires a legislative change.
Power consumption Fibernet	Increased by 2.2% from 1,655 tonnes to 1,690 tonnes of CO ₂ e.	CapEx: High, as energy efficiency measures typically require substantial investments. OpEx: Savings due to lower energy consumption.	Norlys Fibernet is working to reduce energy consumption while serving more customers. In particular, switching to a new IT platform in the technical hubs can potentially reduce energy consumption. The expectation is that the energy consumption will decline despite increased data volumes.
Power consumption Kundeselskabet Norlys	N/A	CapEx: High OpEx: Savings, as energy efficiency measures can save money.	Improved energy efficiency in our data centres, technical hubs and mobile network will reduce energy consumption.

Scope 3	Development in 2024	CapEx / OpEx	Expected development
E1-1/34f	E1-1/16j	E1-1 16c and E1-3 29b	
Transition plan for climate change mitigation	N/A	CapEx: Low OpEx: None	Many suppliers are reducing their climate impact themselves. Norlys and N1 actively use tender criteria that include the companies' climate targets (such as SBTi) and the products' carbon footprint (such as LCA or EPD), which can result in fewer bidders and higher purchase prices. It is expected that at least 2/3 of Norlys' and N1's suppliers will have defined targets in line with the Paris Agreement by 2030.
Sold electricity and sold gas (NB: passive reductions)	N/A	CapEx: None. OpEx: None.	Passive reductions: It is expected that the Danish electricity and gas grids will gradually become less carbon-intensive in the future, which will reduce Norlys' scope 3 emissions. emissions quite significantly.
Circular initiatives	N/A	CapEx: Low/None. OpEx: Low/None.	There will be costs associated with circular initiatives, which can probably be offset by savings, for example: <ul style="list-style-type: none"> • Give our customers access to more energy-efficient end-user equipment. • Establish more take-back schemes, for example for mobile phones for refurbishment. • Increase the refurbishment rate of routers.

Climate targets

E1-4

E1-4/33 | Norlys has set the following climate targets

- **Climate neutral scope 1 and 2 by 2030**
- **Climate neutral scope 3 by 2040**

The climate targets are set to address Norlys' material climate-related impacts and risks.

E1-4/34b | Norlys' climate targets are not 'gross targets', where greenhouse gas removal, such as carbon credits,

is not included. To ensure consistency between Norlys' carbon accounting and Norlys' climate targets, we have followed the GHG Protocol.

E1-4/34c | Norlys' climate targets are compatible with the Paris Agreement and a reduction path of at least 4.2% annually, and Norlys is committed to the Science Based Targets initiative (SBTi). Norlys has not set climate adaptation targets.

Metrics and targets related to climate change	ESRS ref.	Baseline 2024 (tCO ₂ e)	Climate neutrality target (year)	Target (tCO ₂ e) in absolute numbers (year)
Scope 1	E1-4/34a-b	7,073	2030	0 (2030)
Scope 2 – Location-based	E1-4/34a-b	58,503	2030	0 (2030)
Scope 2 – Market-based	E1-4/34a-b	201,096	2030	0 (2030)
Scope 3	E1-4/34a-b	1,192,079	2040	0 (2040)
Total – Scope 1, Location-based Scope 2, Scope 3	E1-4/34a-b	1,257,655	2040	0 (2040)
Total – scope 1, market-based scope 2, scope 3	E1-4/34a-b	1,400,247	2040	0 (2040)

Where are we today and what will it take to reach our climate targets?

Norlys is committed to the Science Based Targets initiative (SBTi) to ensure alignment of our climate targets with the Paris Agreement. We are currently preparing the paperwork needed for the validation of our climate targets, which we expect to submit in the first quarter 2025.

Based on projections and planned actions, we expect a reduction of approximately 66% in our scope 1 and 2 emissions by 2030. This reduction is mainly due to two factors: Replacement of vans with electric vehicles and less carbon-intensive power as renewable energy is increasingly integrated into the grid. The other 34% must be found through a number of measures:

SF₆ gas: The biggest challenge in scope 1

The biggest challenge in scope 1 is SF₆ gas from substations. Elnetselskabet N1 is continuously replacing SF₆-containing components, but as it is not realistic to replace all components before 2030, we plan to offset these emissions from 2030.

In 2024, we entered into a Power Purchase Agreement (PPA) for the supply of power from solar and wind turbines. The agreement covers a large part of the power consumption in our fibre and coax networks and in our customer-facing businesses. The agreement ensures that new and additional solar and wind farms are established that will supply renewable energy to cover part of Norlys' power consumption from 2027 at the latest.

A particular challenge in scope 2 is grid loss that occur in connection with the transport of electricity in the electricity grid. Elnetselskabet N1 is committed to reducing the increase

in grid loss by optimising grid operations and modernising the infrastructure. However, due to the electrification of society grid loss are expected to increase in the coming years. At the present time, electricity grid companies are not allowed to purchase PPAs for grid loss, but we are working with policy-makers to make it possible. Read more about the challenges in the case 'When every kWh counts' on page 37.

First scope 3 baseline creates overview

In 2024, we completed our first scope 3 baseline, giving us a comprehensive overview of our indirect emissions.

We expect to reduce our scope 3 emissions by approximately 50% by 2040. Three quarters of our scope 3 emissions come from sold electricity and gas, where the carbon intensity is expected to decline through passive reductions. To reduce the remaining 50%, active actions are needed.

In particular, purchase of goods and services (category 3.1) and CapEx investments (category 3.2) will require us to work with our suppliers to reduce emissions from these areas. As a first step, we have set a target for two-thirds of our suppliers to have science-based climate targets in place, such as Science Based Targets, by 2030. We have already started working on parts of our supply chain.

To ensure that we reach our scope 3 target, the next step will be to develop action plans with concrete initiatives based on the new baseline and knowledge about the distribution of emissions in the different scope 3 categories.

Energy consumption and mix

E1-5

Norlys is continuously working to reduce energy consumption from our operations. The largest energy consumer is Elnetselskabet N1's grid loss, which are an inevitable part of a grid company's operations.

Norlys reports on energy consumption in 2024 and the development compared to previous years.

E1-5/42 | When calculating the energy content, Norlys has taken into account the energy mix in the Danish energy sector.

Energy consumption	ESRS ref.	Unit	2023	2024 (excluding Telia)	Telia Mobil Danmark 2024	Total (2024)
Energy consumption from fossil fuels						
(1) Coal consumption	E1-5/§38a	MWh	0	0	0	0
(2) Diesel and petrol consumption	E1-5/§38b	MWh	18,339	13,094	646	13,740
(3) Natural gas consumption	E1-5/§38c	MWh	790	1,064	0	1,064
(4) Other fossil fuels, diesel and domestic fuel oil consumption	E1-5/§38d	MWh	29	355	0	355
(5) Electricity, heat and steam etc. consumption from fossil fuels	E1-5/§38e	MWh	282,273	67,452	1,556	69,008
(6) Total energy consumption from fossil fuels (sum of 1-5)	E1-5/§37a	MWh	301,431	81,965	2,202	84,167
Share of fossil fuels in total energy consumption	E1-5/AR 34	%	62	16	13	16
(7) Nuclear energy consumption	E1-5/§37b	MWh	42,391	12,558	1,474	14,032
Share of nuclear energy consumption in total energy consumption	E1-5/AR 34	%	9	3	9	3
Renewable energy (RE) consumption						
(8) Renewable energy consumption, including biomass	E1-5/§37c i.	MWh	0	0	2,237	2,237
(9) Consumption of purchased electricity, heat and steam etc. from renewable energy ¹	E1-5/§37c ii.	MWh	143,272	409,706	11,350	421,056
(10) Consumption of self-generated renewable energy	E1-5/§37c iii.	MWh	141	146	0	146
(11) Total energy consumption of renewable energy sources (sum of 8-10)	E1-5/§37c	MWh	143,413	409,852	13,587	423,439
Share of renewable energy in total energy consumption	E1-5/AR 34	%	29	82	79	82
Total energy consumption (sum of 6 and 11)		MWh	444,844	491,817	15,789	507,606

Energy intensity = Total energy consumption from activities in high impact climate sectors (MWh) / (Net revenue in high impact sectors (monetary unit))

¹Including purchased electricity for charging electric cars

²Note that nuclear power is not included in the total energy consumption

Note: The standby consumption of Norlys' charging stations (approximately 224 MWh) is not included in the above breakdown



Case

When every kWh counts

Efforts to limit the increase in grid loss in the distribution grid

The increasing electrification of our society leads to a growing need for power – from electric cars to green industrial solutions. When power is transported through the grid to more than 805,000 households and businesses via Elnetselskabet N1, a small part of it is lost as heat. This is known as grid loss, and although it represents a modest percentage of the total power, it equates to millions of kWh each year and makes up a substantial part of Norlys' carbon footprint. Therefore, minimising grid loss is central to our ambition to reach scope 1 and 2 climate neutrality by 2030.

Due to the electrification of society grid loss are expected to increase in the coming years. This is a natural consequence of having to transport more power through our cables and substations. As the capacity of these assets is fully utilised, grid loss will increase. This is basically because the assets heat up, releasing energy. We are working hard to reduce

the increase in grid loss. One of the most important efforts is to optimise the operation of the electricity grid. Using advanced calculations and tests, we ensure that the power is transported with the least possible resistance. We are constantly looking at how we can optimise the grid, and our goal is to automate the processes to limit the increase in grid loss even more effectively.

Another effort is to modernise our infrastructure. When we expand or renovate the electricity grid, we replace older components with more efficient solutions that reduce resistance in cables and transformers. It is a balanced approach that considers both the climate and the resources we use. We are also working to ensure that in the future grid loss can be covered by electricity from renewable energy sources to minimise the climate impact.

Gross Scopes 1, 2, 3 and total GHG emissions

E1-6

We calculate our greenhouse gas emissions based on the GHG Protocol. For more information on methodologies, priorities and non-priorities, see the Carbon Accounting Manual in the appendix 'Carbon Accounting Manual'.

Greenhouse gas emissions (GHG emissions) ¹	Unit	ESRS ref.	2023	2024 (excluding Telia)	Telia Mobil Danmark 2024	Total Norlys (incl. Telia) 2024
Scope 1 GHG emissions						
Direct GHG emissions, scope 1 GHG emissions	Tonnes of CO ₂ e	E1-6/44a + 48a	6,577	6,868	205	7,073
Scope 2 GHG emissions						
Indirect GHG emissions (location-based)	Tonnes of CO ₂ e	E1-6/44b + 49a	57,890	57,335	1,168	58,503
Indirect GHG emissions (market-based)	Tonnes of CO ₂ e	E1-6/44b + 49b	174,716	201,080	16	201,096
Scope 3 GHG emissions²						
Scope 3.1: Procurement of goods and services	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	103,326	40,916	144,242
Scope 3.2: Capital goods	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	51,133	2,668	53,801
Scope 3.3: Fuel and energy-related	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	513,705	537	514,242
Scope 3.4: Upstream transport and distribution	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	2,290	570	2,860
Scope 3.5: Waste	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	67	1	69
Scope 3.6: Business travel	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	1,973	332	2,305
Scope 3.7: Employee commuting	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	4,982	1,407	6,389
Scope 3.9: Downstream transport and distribution	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	28	586	614
Scope 3.11: Use of sold products	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	424,018	759	424,777
Scope 3.12: End-of-life treatment of sold products	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	1	2	3
Scope 3.13: Downstream leased activities	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	N/A	147	147
Scope 3.15: Investments	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	19,164	23,466	42,630
Total, upstream (cat. 3.1 - 3.8)	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	677,477	46,431	723,908
Total, downstream (cat. 3.9 - 3.15)	Tonnes of CO ₂ e	E1-6/44c + 51	N/A	443,211	24,960	468,171
Total GHG emissions						
Total GHG emissions, Scope 1 + 2 (Location-based) + Scope 3	Tonnes of CO ₂ e	E1-6/44d + 52a	64,467	1,184,891	72,764	1,257,655
Total GHG emissions, Scope 1 + 2 (Location-based) + Scope 3	Tonnes of CO ₂ e	E1-6/44d + 52b	174,716	1,328,636	71,611	1,400,247

¹Eurowind Energy A/S was recognised at a rate of 50% in Norlys' carbon accounting for 2021 and 2022. After having reviewed the legal obligations of the Norlys Group, it was assessed that Eurowind Energy A/S should not be included in scope 1 and 2, which is why the company is not included in the above model.

²Baseline year for scope 3 is 2024.

Scope 3

The following categories are included and excluded, respectively

E1-6 AR46

Scope 3.1-3.7	Included
Scope 3.8	Excluded as the Norlys Group has no upstream leased activities
Scope 3.9	Included
Scope 3.10	Excluded as the Norlys Group has no direct processing or manufacturing of goods
Scope 3.11-3.13	Included
Scope 3.14	Excluded as the Norlys Group has no franchises
Scope 3.15	Included

By far the largest emissions come from scope 3 categories 1, 3 and 11; see more in E1-1. 49.9% of scope 3 data is based on primary data. Reporting scope, calculation methods for estimation as well as calculation tools can be found in the appendix 'Carbon Accounting Manual' on page 86 (E1-6/AR39).

E1-6/47 | There are no changes in the up- and downstream definitions, as 2024 will be the first year Norlys includes scope 3.

E1-6/AR41 | Norlys disaggregates information by scope. See table Metrics and targets related to climate change See table Greenhouse gas emissions (GHG emissions) in E1-6.

Emission intensity

E1-6 AR53-55 | Referring to note 3 of Norlys' annual report, the Norlys Group's revenue is DKK 14,289 million. This amount is also used for the intensity calculation below:

GHG intensity per net revenue	Unit	Reporting point	Intensity value
Total GHG emissions (location-based) per net revenue	Tonnes of CO ₂ e/million DKK	E1-6/53	88
Total GHG emissions (market-based) per net revenue	Tonnes of CO ₂ e/million DKK	E1-6/53	98

Calculation method: Total GHG emissions (Location/Market-based) tCO₂e / Net revenue (million DKK)



Emission sources

Emission source	ESRS ref.	Unit	Consumption – Norlys	Emissions Norlys (tCO ₂ e)	Consumption – Telia	Emissions Telia tCO ₂ e	Total tCO ₂ e
Transport total	E1-6/AR 41						
Diesel (B7)	E1-6/AR 41	L	1,275,878	3,173	63,394	159	3,332
Petrol (E10)	E1-6/AR 41	L	54,776	116	2,094	4	120
Stationary combustion total	E1-6/AR 41						
Natural gas (DK)	E1-6/AR 41	m ³	103,982	124	0	0	124
Fuel oil	E1-6/AR 41	L	34,723	94	0	0	94
Wood pellets	E1-6/AR 42	kWh	12,200	0.1	0	0	0.1
Propane gas	E1-6/AR 43	kg	11	<0.1	0	0	<0.1
Chemical process	E1-6/AR 41						
SF6	E1-6/AR 41	kg	142	3,327	0	0	3,327
Refrigerants	E1-6/AR 41						
R-407C	E1-6/AR 41	kg	0	0	0	0	0
R-32	E1-6/AR 41	kg	43	29	2	1	30
R410A	E1-6/AR 41	kg	3	5	21	40	45
R717	E1-6/AR 41	kg	0	0	0	0	0
Scope 1 total				6,868		205	7,073

Emission source	Description	ESRS ref.	Consumption – Norlys	Norlys Location-based emissions	Norlys Market-based emissions	Consumption – Telia	Telia Location-based emissions	Telia Market-based emissions	TOTAL tCO ₂ e, location-based	TOTAL tCO ₂ e, market-based
Electricity										
Electricity Denmark 125%	Car consumption	E1-6/AR 41	2,306	286	996	285	35	0	321	996
Electricity Denmark 125%	Coax infrastructure	E1-6/AR 41	7,172	880	112	0	0	0	862	0
Electricity Denmark 125%	Fibre network infrastructure	E1-6/AR 41	13,630	1,690	0	0	0	0	1,690	0
Electricity Denmark East (DK2)	Buildings	E1-6/AR 41	152	8	24	677	41	0	49	24
Electricity Denmark East (DK2)	Data centre	E1-6/AR 41	0	0	0	11,793	834	0	834	0
Electricity Denmark West (DK1)	The grid company's infrastructure	E1-6/AR 41	6,617	774	3,302	0	0	0	774	3,302
Electricity Denmark West (DK1)	Buildings	E1-6/AR 41	8,605	1,007	352	477	34	0	1,041	352
Electricity Denmark West (DK1)	Grid loss	E1-6/AR 41	444,583	52,016	194,783	0	0	0	52,016	194,783
Electricity Denmark West (DK1)	Buildings (operating buildings)	E1-6/AR 41	221	26	111	0	0	0	26	111
Electricity Denmark West (DK1)	Buildings (lamp posts)	E1-6/AR 41	6	1	3	0	0	0	1	3
Electricity Denmark West (DK1)	Buildings (courtyard and pavilion)	E1-6/AR 41	85	10	43	0	0	0	10	0
Electricity Denmark West (DK1)	Solar panel consumption	E1-6/AR 41	146	17	0	0	0	0	17	0
Electricity Denmark West (DK1)	Data centre	E1-6/AR 41	1,923	225	960	2,948	209	0	434	960
District heating – locations										
District heating DK/Silkeborg	Buildings	E1-6/AR 41	676	81	81	0	0	0	81	81
District heating DK/Aarhus	Buildings	E1-6/AR 41	1,759	130	130	0	0	0	130	130
District heating DK/Aarhus	Data centre	E1-6/AR 41	85	6	6	0	0	0	6	6
District heating DK/Kolding	Buildings	E1-6/AR 41	264	14	14	0	0	0	14	14
District heating DK/Aalborg	Buildings	E1-6/AR 41	605	74	74	0	0	0	74	74
District heating DK/Aalborg	The grid company's infrastructure	E1-6/AR 41	363	44	44	0	0	0	44	44
District heating DK/Copenhagen	Buildings	E1-6/AR 41	120	4	4	0	0	0	4	4
District heating DK/Esbjerg	Buildings	E1-6/AR 41	280	26	26	0	0	0	26	26
District heating DK/Sonderborg	Buildings	E1-6/AR 41	359	10	10	0	0	0	10	10
District heating DK/Grenaa	Buildings	E1-6/AR 41	37	1	1	0	0	0	1	1
District heating DK/Horsens	Buildings	E1-6/AR 41	25	2	2	0	0	0	2	2
District heating DK/Torring	Buildings	E1-6/AR 41	16	2	2	0	0	0	2	2
District heating DK/Herning	Buildings	E1-6/AR 41	50	3	3	0	0	0	3	3
District heating DK/Telia		E1-6/AR 41	0	0	0	443	16	16	16	16
Scope 2 Total			490,086	57,335	201,080	16,624	1,168	16	58,503	201,096

E1-6 AR39b | Methodologies are described in Norlys' accounting manual in the appendix 'Carbon Accounting Manual' on page 86.

Biogenic emissions

Biogenic emissions cover those greenhouse gases that are considered to be carbon-neutral according to the GHG Protocol as the gases have recently been absorbed by plants. Carbon emissions from biogenic material should not be included in Norlys' carbon accounting (Scope 1, 2 and 3), but are instead calculated separately. Other greenhouse gases from biogenic material (especially CH₄ and N₂O) should still be included in the normal accounts.

Scope	ESRS ref.	Emissions (tCO ₂ e)
Out of scope – Scope 1	E1-6/AR43c	324
Out of scope – Scope 2	E1-6/AR45e	36,177
Out of scope – Scope 3	E1-6/AR46j	603,823
Out of scope – Total		640,324

GHG removals and GHG mitigation projects financed through carbon credits

E1-7

Norlys owns forests that also in 2024 absorbed CO₂. Here, we report separately on the carbon removal that has occurred in the forests owned by Norlys. We do not currently include forest carbon removal

in our carbon accounting, nor did we utilise any carbon credits in 2024.

In 2024, the forests owned by Norlys removed 554 tonnes of CO₂.

Carbon removal	Unit	2022	2023	2024
Carbon credits	Tonnes of CO ₂ e	0	0	0
Carbon removal through own forest	Tonnes of CO ₂ e	N/A	1,914	554
Total removed CO ₂ e	Tonnes of CO ₂ e		1,914	554

Carbon credits going forward

E1-7/60 | Norlys is committed to reducing all greenhouse gas emissions to reach our climate neutrality targets. In some cases, emissions will be technologically or financially impossible to remove. Therefore, Norlys plans to use recognised and third-party verified carbon credits as a supplement to reach our climate targets, but a concrete plan has yet to be adopted.

Norlys aims to be climate-neutral across the value chain (Scope 1, 2 and 3) by 2040. Active and passive reductions will account for at least 90% of the required reductions, while the remaining 10% can be covered by the use of carbon credits. Our focus on actual reductions will always come before carbon offsetting.

Calculation method

Every year, the carbon removal from forest growth is calculated. We deduct the CO₂e that has been removed from the forest through harvesting and thus disclose net growth. The calculation method is based on a model calculation, which is updated annually. Norlys acknowledges that removal from forests implicitly entails a risk of 'non-permanence', e.g. in the event of fire, disease or storm felling. We mitigate this risk by gradually making the forest more varied and therefore more resilient.

Biodiversity

Norlys' forest has historically been established as plantation forest without biodiversity considerations. Most of the forest is still managed as plantation forest, but Norlys has implemented several biodiversity-friendly initiatives, e.g. continuously converting parts of the forest from coniferous to hardwood, working with self-regeneration in parts of the coniferous stands, planting shrubs and other fruit-bearing hardwoods and zoning a larger area for untouched forest. In addition, work is being done to protect the light-open natural protection areas.

Carbon accounting for Norlys' forests 2024	Unit	2024
Gross removal	Tonnes of CO ₂ e	2,775
Harvesting	Tonnes of CO ₂ e	2,221
Net removal	Tonnes of CO ₂ e	554

Case

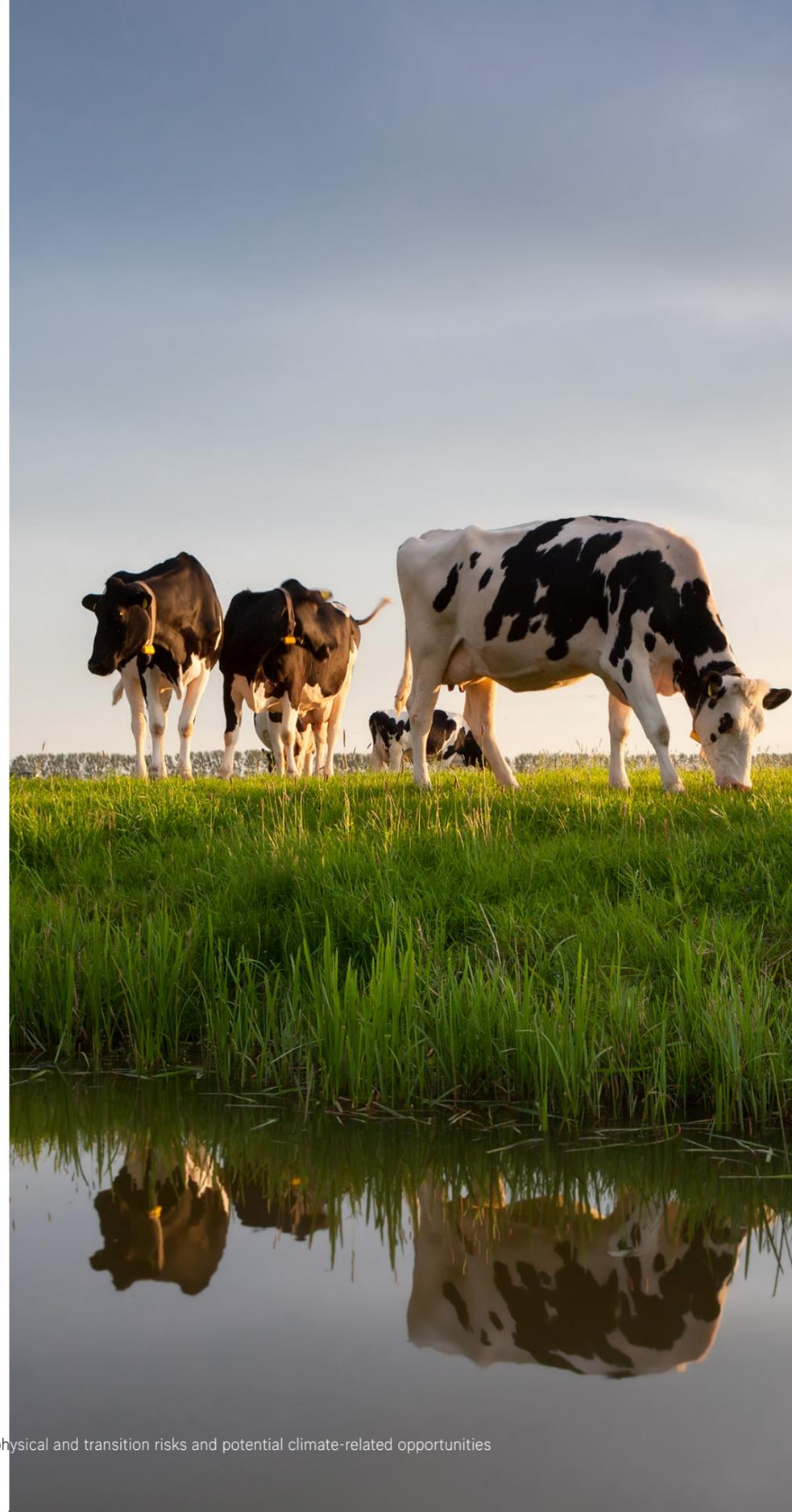
The future of energy storage

Norlys Energy Trading and Aalborg University partner on future energy storage

Norlys Energy Trading has set up Energy ResearchLab in Aalborg, Denmark, a research and analysis unit dedicated to the future of energy storage. The lab is working closely with Aalborg University (AAU) to develop innovative methods to store energy from renewable energy sources such as solar and wind.

The accelerating electrification and green transition require efficient storage solutions. Energy ResearchLab brings together industry and research expertise to develop methods that increase the value of renewable energy, regardless of weather conditions.

By leveraging North Jutland's strong energy sector and AAU's leading position in energy research, the goal is to create a unique platform where research is translated into practical solutions.



Internal carbon pricing

E1-8

Norlys does not operate with an internal carbon tax, internal carbon pricing or carbon opportunity cost.

Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

E1-9

Norlys has chosen to use the option to phase in the disclosure of expected financial impacts. Therefore, we will implement a comprehensive analysis of the financial impact of climate change and climate adaptation in the coming years.

Norlys has physical assets at more than 1,000 different locations and will therefore make a full analysis of the risk of climate-related impacts within the next few years.

E2 Pollution of air

E2-2

Pollution is harmful to both people and the environment, especially those closest to the pollution. Norlys has more than 805,000 members, and our supply area covers 40% of Denmark's area. This means that we have a special responsibility to reduce the pollution generated by our activities.

Norlys has identified air pollution as a material impact, partly due to our many vehicles.



E2-1

Policies related to pollution

Norlys' climate, energy and environment policy will create the framework for Norlys' environmental efforts, including pollution. This policy focuses on Norlys itself. With respect to Norlys' upstream value chain, Norlys has a supplier code of conduct, which includes air pollution.

Climate, energy and environment policy
E2-1/15a | The policy provides guidelines on how to minimise our climate and environmental impact, including air pollution. In 2024, the policy covered all wholly owned companies and Norlys Fibernet. Telia Mobil Danmark is covered by the policy as at 1 January 2025.

E2-1/15c | Norlys does not have policies that specifically address air pollution accidents or emergencies.

Actions and resources related to pollution

E2-2

Norlys is in the process of implementing two initiatives to reduce air pollution from Norlys' activities:
 1) route optimisation and 2) switch to electric vehicles

Route optimisation

Norlys still has petrol and diesel vehicles. Therefore, Norlys has changed the division of districts based on the technicians' place of residence so they will have to drive fewer kilometres. The aim is for technicians and their vans to drive fewer kilometres and emit fewer particles from the vehicles going forward.

Switch to electric vehicles

Norlys is switching to electric vehicles. All new passenger cars have been electric cars since the end of 2021. We expect the vast majority of passenger cars to be electric by 2025. We have a pilot project where we are testing electric vans to replace our diesel vans.

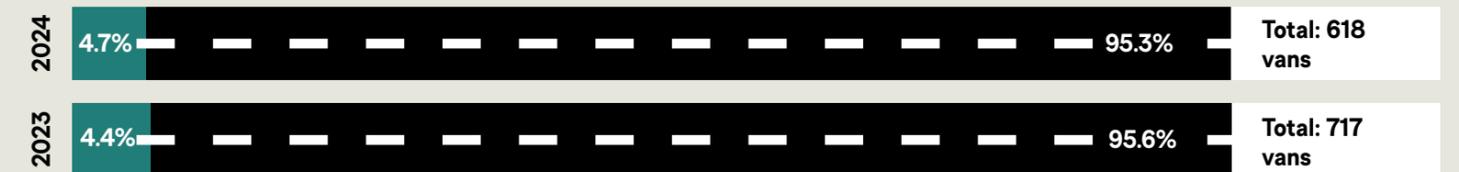
Switching to electric vehicles significantly reduces air pollution such as NOx and SOx, but there will still be some pollution from microplastics shed by the vehicles' tyres during driving.

Number of vehicles

Passenger cars



Vans



In addition to this, there are three tractors and 28 trucks.

Targets related to pollution

E2-3

Norlys has not set any air pollution targets. However, we have two targets which are indirectly related to air pollution.

The two relevant targets are:

- Norlys will be climate neutral in scope 1 and 2 (2030). The target will be measured in tonnes of CO₂e. The target is relevant because it will lead to fewer petrol and diesel vehicles in our fleet and thus less air pollution.

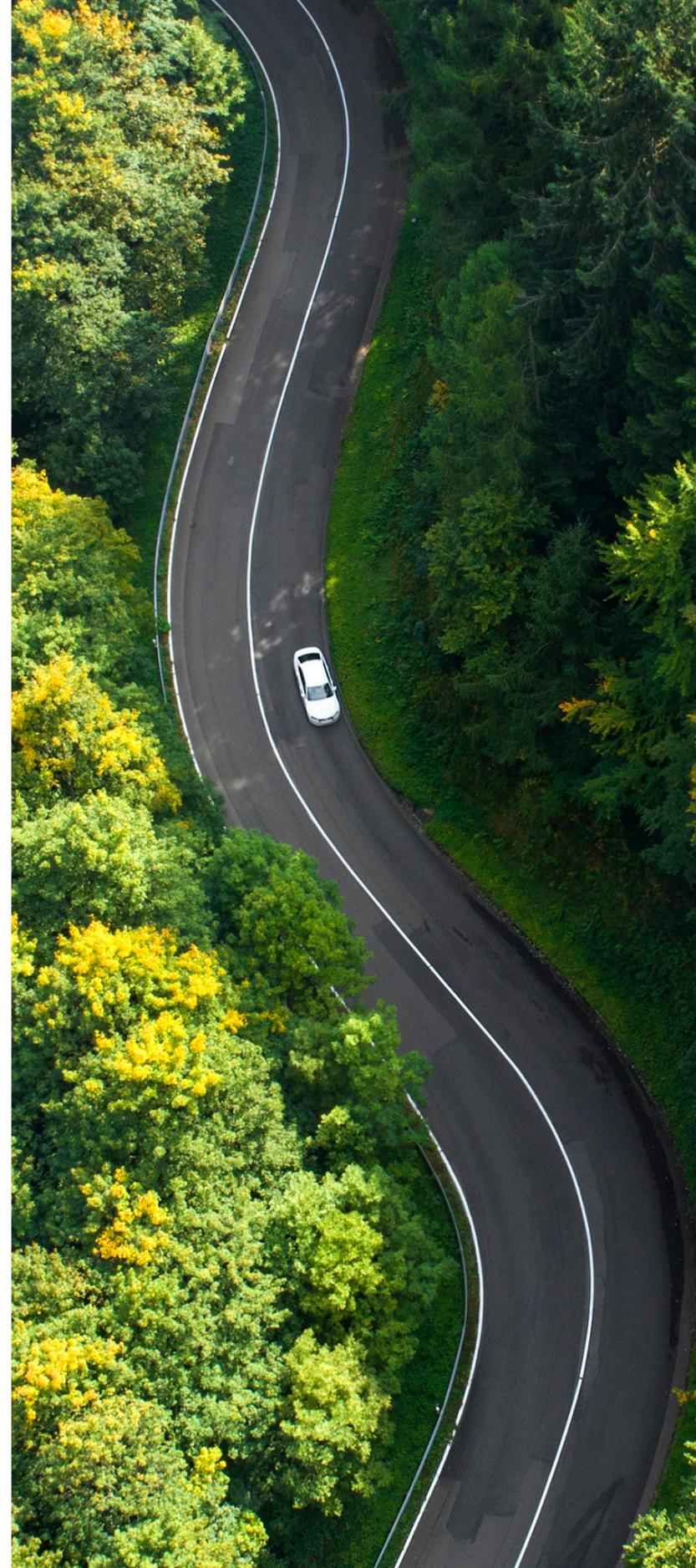
- Norlys will have an overall electrification rate of 40% by the end of 2027 in our electricity grid company's supply area. The target is measured in %. The target is relevant because electrification replaces fossil fuels that often cause air pollution, for example when switching from petrol cars to electric cars or from oil boilers to heat pumps.

E2-3/25 | Norlys assesses that both targets are accurate and relevant, even though they do not directly measure air pollution. Both targets are voluntary and not required by law.

Data on air pollution

E2-4

Pollution of air		
Fuel consumption	Unit	Total
Petrol	Litre	35,868
Diesel	Litre	1,328,741
Emissions		
SOx	Gram	227
NOx	Kg	2,279



CASES

Norlys wins Green Fleet Award 2024

For the second consecutive year, in 2024 Norlys was awarded the Green Fleet Award in the 100+ company car category for our large share of zero emission vehicles. As Denmark's second largest provider of publicly accessible charging stations, it is natural that our own fleet also runs on electricity. 90% of our passenger cars in the company car scheme are electric.

The Green Fleet Awards are presented annually by Mobility Denmark in four categories based on company fleet size.

From charging time to quality time

As part of Norlys' vision to turn charging time into quality time, in 2024 we launched the interactive experience entitled 'The Hunt for Good Energy' at our new high-speed charging hub at the Drejebænken motorway services south of Odense. In collaboration with the Experimentarium science centre in Copenhagen, we have created a concept which, through play and learning, makes waiting time a positive part of the journey.

Our charging hubs designed as modern meeting places with green spaces, refreshments and interactive learning activities. With the opening of the first two of 15 planned charging hubs, we want to set a new standard for how future charging infrastructure can become a positive part of everyday life.



Methodology and data collection

E2-4/30b | Norlys’ approach to calculating SOx and NOx is based on public pollution factors multiplied by actual fuel consumption.

E2-4/30c | To ensure a solid data foundation, ongoing tests of consumption data have been carried out in cooperation with the providers and fleet managers of all subsidiaries, ref. E1-6/AR39. The methodology ensures consistent data across the companies and a complete picture of the amount of fuel consumed.

The calculations for NOx are based on Euro Norms for petrol and diesel cars. SOx is calculated based on the sulphur content from the EU Fuel Directive and density in relation to the fuel consumed and its type. The consumption for hybrid cars is included and distributed according to the secondary type of fuel used.

Norlys’ calculations consider the car class, fuel type and the age of the vehicle.

E2-4/31 | Norlys acknowledges that the methodology used to estimate air pollution is less accurate than measuring actual emissions. If we were to measure actual emissions, it would require large investments in measuring equipment. Norlys wants to devote its resources to switching to electric vehicles that cause less air pollution rather than measuring air pollution.

Air pollution calculations are based on Euro Norms, density and maximum sulphur content according to the EU Fuel Directive, ref. E2-4/30c. This leads to a degree of uncertainty such as direct measurements or more specific data on the vehicles which could be alleviated by, for example, engine capacity. However, the calculations are based on pollution factors and credible measurements of consumption, with only a few cars in the smallest subsidiaries requiring partial estimation based on the number of kilometres driven.

EU Taxonomy

Introduction

This is Norlys a.m.b.a.’s first reporting based on the EU Taxonomy as described in the Taxonomy Regulation (2020/852). The EU Taxonomy is a classification system aimed at defining which economic activities can be classified as environmentally sustainable.

The reporting is based on the acts prepared by the European Commission that together constitute the Taxonomy Regulation, including the Climate Regulation (Delegated Regulation 2021/2139), the Information Regulation (Delegated Regulation 2021/2178) and the Environmental Regulation (Delegated Regulation 2023/2486). To this should be added materials prepared by the European Commission such as communications, which can be found on the Commission’s website.

When reporting under the EU Taxonomy, companies must determine the proportion of their turnover, capital expenditure (investments) and operating expenditure that relates to economic activities covered by the Taxonomy Regulation (eligible) and the proportion that can be qualified as sustainable activities based on the criteria in the Taxonomy Regulation (aligned).

Norlys is not formally required to report under the Taxonomy Regulation until the financial year 2025 but has chosen to report voluntarily for the financial year 2024. As a result, Norlys only reports the proportion of turnover, investments and operating expenditure that is covered by the Taxonomy Regulation, but not the proportion that meets the requirements for classification as environmentally sustainable (aligned). The assessment of what share qualifies as environmentally sustainable will be carried out as part of the formal reporting for the financial year 2025. Norlys does not report for the financial year 2023. As such, these fields are left empty in the tables below.

In the following, Norlys’ approach to reporting is presented first, including relevant interpretations and accounting policies. This is followed by the required key performance indicators (KPIs) for turnover, investments and operating expenditure.

Description of the classification process

In order to classify turnover, investments and operating expenditure according to the Taxonomy Regulation, it is necessary to review and understand the description of the economic activities described in the Taxonomy Regulation. Furthermore, it is necessary to review and understand the accounting definitions used, as not all turnover, investments and operating expenditure are included in the Taxonomy Regulation definitions. This is further described below.

Based on the above understanding, all turnover, investments and operating expenditure can be classified as either: ‘not applicable’ (not included in the definition of turnover, investments or operating expenditure), ‘not covered’ (not eligible) or ‘covered’ (eligible). In the tables below, only figures based on ‘not eligible’ and ‘eligible’ are included.

The result of this process shows that part of Norlys’ turnover, investments and operating expenditure can be classified as ‘eligible’ for the financial year 2024.

Result of the classification process

The above process shows that the following activities are relevant to Norlys:

CCM 3.20 Manufacture, installation, and servicing of high, medium and low voltage electrical equipment for electrical transmission and distribution: A subset of Elnetselskabet N1’s activities can be attributed to this activity.

CCM 4.1 Electricity generation from hydropower: Norlys owns Gudenåcentralen, which primarily owns and operates a hydropower plant.

CCM 4.9 Transmission and distribution of electricity: N1 A/S owns and operates electricity transmission and distribution grids in Denmark. Greenlab Skive owns and operates a small electricity grid.



CCM 4.15 District heating/cooling distribution: Norlys owns Greenlab Skive A/S, which distributes surplus heat between the company’s parks. It has been identified as an eligible activity, but it represents an insignificant share of the related income of less than 0.0001%.

CCM 6.5 Transport by motorbikes, passenger cars and light commercial vehicles: In Norlys, vehicles are leased. This activity is relevant from an OpEx perspective.

CCM 6.15 Infrastructure enabling low-carbon road transport and public transport: Norlys Charging owns and installs publicly accessible charging stations.

CCM 7.1 Construction of new buildings: Norlys is in the process of constructing a new building in Aalborg. In 2024, the land was purchased, and various project costs were incurred.

CCM 7.2 Renovation of existing buildings: In 2024, Norlys renovated a building in Esbjerg.

CCM 7.3 Installation, maintenance and repair of energy efficiency equipment: In 2024, Norlys replaced light sources in several buildings.

CCM 7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings): Norlys Energi sells and installs private and commercial charging stations for private use in conjunction with a building.

CCM 7.7 Acquisition and ownership of buildings: Norlys has not only its own buildings and offices but also some that are leased or rented.

CCM 8.1 Data processing, hosting and related activities: Telia Mobil Danmark owns and manages several data centres.

CCA 8.3 Radio and television programming and broadcasting activities: Norlys Digital distributes digital content. This activity is included in the climate change adaptation target. The activity is classified as ‘enabling’. The revenue, CapEx and OpEx reported as associated with this activity are thus not related to climate change mitigation in the form of protective measures for physical

assets, but only to potential enabling activities.

CE 5.4 Sale of second-hand goods: Norlys owns Telia Mobil Danmark, which gives customers the opportunity to hand in their used mobile phones in exchange for a new one. The used mobile phone is then refurbished and sold on.

In addition to the above activities, Norlys has also identified the activity ‘CCA 8.2 Computer programming, consultancy and related activities’. This activity is relevant for Mjølner, Automize and OpenNet. It is Norlys’ understanding that Norlys should not classify the revenue from these companies as included in this activity as the activity is not classified as ‘enabling’. As the companies have not incurred costs related to climate adaptation measures, there are no relevant figures to report for this activity.

Accounting policies

The work of identifying turnover, investments and operating expenditure has been based on the existing financial reporting, and thus follows the Danish Financial Statements Act. All figures reported as part of this reporting are consistent with the financial reporting. Consequently, the calculation follows the same consolidation as the financial figures reported for Norlys. This means that the reported turnover figures only reflect external sales.

Taxonomy reporting is based on three financial figures: turnover, investments and operating expenditure. These three figures are further defined in the Taxonomy Regulation, meaning that the reporting only includes a subset of the total figures.

Turnover: The Taxonomy Regulation defines turnover as net turnover as defined in Article 2(5) of Directive 2013/34/EU. As such, only net turnover is included in the reporting.

Capital expenditure (CapEx, investments): According to the Taxonomy Regulation, investments include “additions to tangible and intangible assets during the financial year considered before depreciation, amortisation and any re-measurements” and “additions to tangible and intangible assets resulting from business combinations”. This means that additions of, for example, financial assets are not included.

Operating expenditure (OpEx): The Taxonomy Regulation defines operating expenditure as “direct non-capitalised costs that relate

to research and development, building renovation measures, short-term leasing, maintenance and repair, and any other direct expenditure relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets.”

This means that operating expenditure does not include ordinary operating expenditure such as power consumption, or other goods consumption related to ordinary operations. In FAQ 12 in the notice 2022/C 385/01, the European Commission has further specified how operating expenditure to be included in the calculation should be understood.

The turnover, investments and operating expenditure used in the reporting templates are based on the consolidated financial statements for 2024. See note 3 in the annual financial report for details on net turnover, while information on investments can be found in note 10 on intangible assets and note 11 on property, plant and equipment. The denominator for OpEx is based on costs related to maintenance, repair, leasing and service costs included as part of direct costs and external costs.

Proportion of turnover

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering 2024

Financial year 2024	2024		Substantial contribution criteria							DNSH criteria ('do no significant harm')						Minimum safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) turnover, 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
	Code (2)	Turnover (3)	Proportion of turnover, 2024 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)				
		Currency (million DKK)	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	%	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.00	0%																
Of which enabling activities		0.00	0%																
Of which transitional activities		0.00	0%																
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
		Currency (million DKK)	%	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Transmission and distribution of electricity	CCM 4.9	2,242	15.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Manufacture, installation, and servicing of high, medium and low voltage electrical equipment for electrical transmission and distribution	CCM 3.20	132	0.93%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Electricity generation from hydropower	CCM 4.1	8	0.06%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
District heating/cooling distribution	CCM 4.15	0.01	0.0001%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	15	0.11%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	90	0.63%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Acquisition and ownership of buildings	CCM 7.7	1	0.01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Radio and television programming and broadcasting activities	CCA 8.3	896	6.27%	N/EL	EL	N/EL	N/EL	N/EL	N/EL										
Sale of second-hand goods	CE 5.4	7	0.05%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		3,392	23.7%	17%	6%	0%	0%	0.05%	0%										
A. Turnover of Taxonomy-eligible activities (A.1+A.2)		3,392	23.7%	17%	6%	0%	0%	0.05%	0%										
B. Taxonomy-non-eligible activities																			
Turnover of Taxonomy-non-eligible activities		10,897	76.3%																
Total		14,289	100%																

	Proportion of turnover/total turnover	
	Taxonomy-aligned per target	Taxonomy-eligible per target
CCM	0%	17%
CCA	0%	6%
WTR	0%	0%
CE	0%	0.05%
PPC	0%	0%
BIO	0%	0%

Proportion of CapEx

Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering 2024

Financial year 2024	2024		Substantial contribution criteria							DNSH criteria ('do no significant harm')							Minimum safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) CapEx, 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
Economic activities (1)	Code (2)	CapEx (3)	Proportion of CapEx, 2024 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)					
		Currency (million DKK)	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	%	E	T	
A. Taxonomy-eligible activities																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.00	0%																	
Of which enabling activities		0.00	0%																	
Of which transitional activities		0.00	0%																	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
		Currency (million DKK)	%	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL											
Transmission and distribution of electricity	CCM 4.9	1,556.7	37.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	16.9	0.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	624.2	15.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Construction of new buildings	CCM 7.1	109.3	2.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Renovation of existing buildings	CCM 7.2	1.5	0.04%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	3.2	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	281.6	6.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Acquisition and ownership of buildings	CCM 7.7	10.0	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Data processing, hosting and related activities	CCM 8.1	2.7	0.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL											
Radio and television programming and broadcasting activities	CCA 8.3	45.1	1.1%	N/EL	EL	N/EL	N/EL	N/EL	N/EL											
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		2,651	63.5%	62%	1%	0%	0%	0%	0%											
A. CapEx of Taxonomy-eligible activities (A.1+A.2)		2,651	63.5%	62%	1%	0%	0%	0%	0%											
B. Taxonomy-non-eligible activities																				
CapEx of Taxonomy-non-eligible activities		1,524	36.5%																	
Total		4,175	100%																	

	Proportion of CapEx / total CapEx	
	Taxonomy-aligned per target	Taxonomy-eligible per target
CCM	0%	62%
CCA	0%	1%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

OpEx

Financial year 2024	2024			Substantial contribution criteria						DNSH criteria ('do no significant harm')									
Economic activities (1)	Code (2)	OpEx (3)	Proportion of OpEx, 2024 (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) OpEx, 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		Currency (million DKK)	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	Y; N	%	E	T
A. Taxonomy-eligible activities																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.00	0%																
Of which enabling activities		0.00	0%																
Of which transitional activities		0.00	0%																
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
		Currency (million DKK)	%	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Electricity generation from hydropower	CCM 4.1	2.0	0.5%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Transmission and distribution of electricity	CCM 4.9	125.3	28.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	58.7	13.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Infrastructure enabling low-carbon road transport and public transport	CCM 6.15	1.1	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	29.7	6.7%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Acquisition and ownership of buildings	CCM 7.7	69.6	15.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
Data processing, hosting and related activities	CCM 8.1	2.7	0.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL										
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		289.0	64.9%	65%	0%	0%	0%	0%	0%										
A. OpEx of Taxonomy-eligible activities (A.1+A.2)		289.0	64.9%	65%	0%	0%	0%	0%	0%										
B. Taxonomy-non-eligible activities																			
OpEx of Taxonomy-non-eligible activities		156.60	35.1%																
Total		445.6	100%																

	Proportion of OpEx / total OpEx	
	Taxonomy-aligned per target	Taxonomy-eligible per target
CCM	0%	65%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

Social conditions



Norlys' social responsibility

As a cooperative, we have a special obligation to contribute positively to the society we are part of. Our social responsibility extends from our own employees to the Danish society. In 2024, we introduced specific initiatives within key societal themes such as work environment, loneliness, digital and green equality. Green and digital equality is about ensuring that everyone has access to the solutions of the future. This requires not only a strong digital infrastructure but also a fair green transition where no one is left behind. That is why we are committed to connecting urban and rural areas by rolling out high-speed broadband and 5G networks in remote areas and establishing a nationwide charging network. Moreover, our energy app, which won a European award for user-friendliness in 2024, is helping a growing number of Danes track electricity prices and save energy.

As part of our focus on a healthy work life, we have garnered attention with our unlimited children's sick days policy, openly sharing our experiences to inspire others at a time when family policy is becoming increasingly important in the public debate. Through a new three-year partnership with the Red Cross, we also want to contribute to the fight against loneliness in Denmark.

The following sections provide deeper insight to our social responsibility efforts, highlighting both significant progress and identifying areas that require further action to achieve our ambitions.



Highlights 2024



Establishment of a D&I Board

Norlys established a D&I Board to ensure progress and integration of D&I efforts across Norlys' companies, focusing on strategic anchoring and support for adopted initiatives.

Sharing of data on unlimited children's sick days

Norlys published preliminary data and experiences after the introduction of unlimited children's sick days to inspire others at a time when family policy is dominating the public debate.



Partnership against loneliness

Norlys entered a three-year partnership with the Red Cross, donating DKK 1 million annually to their important work to help lonely people connect with others.



Attractive workplace

For the second consecutive year, Norlys moved up 10 places and is now in the top 10 of Denmark's most attractive workplaces for IT professionals according to Universum.



Security is standard – not an optional extra

At a time when the cyber threat to Danish businesses is on the rise, Norlys included comprehensive security solutions by default in all our new business internet packages in 2024.



User-friendly energy app

In 2024, Norlys' energy app won a European Lovie Award for user-friendliness, and the growing usage of the app shows that many Danes actively use it to track electricity prices and save energy.

S1 – Own workforce



Case

Way out of loneliness is through strong communities

At Norlys, a strong sense of belonging is an inherent part of our identity. Without the strong sense of community that is at the heart of the cooperative philosophy, Norlys would not have existed. With our deep belief in the power of community, we see it as our natural responsibility to help fighting loneliness in society.

The donations go to initiatives such as Besøgstjenesten and SnakSammen. Besøgstjenesten helps lonely people through home visits by volunteers, while SnakSammen offers online conversations. With our donation, we can help up to 1,500 people through Besøgstjenesten or 2,700 people through SnakSammen. The aim of the partnership is to raise awareness of loneliness in society.

Loneliness is one of the biggest challenges in Denmark today, affecting over 500,000 people across ages and backgrounds. In 2024, Norlys entered a three-year partnership with the Red Cross, donating DKK 1 million annually to support their efforts to combat loneliness.

A good work life at Norlys

At Norlys, we take our social responsibility seriously and want to create positive change through strong communities. The conditions we provide for our employees' working lives play a key role in this regard.

We give high priority to employee well-being and work hard to provide flexible conditions and give our employees the opportunity to influence their own work life. This contributes to a more inclusive work culture, strengthens work-life balance and creates the best conditions for well-being and job satisfaction.



Norlys' gender diversity targets

40/60% gender balance in top management by 2030



Policies for a good and flexible work life

S1-1



S1-1/17a | **S1-1/24a-d** see page 60. We work hard to ensure the best possible conditions for all Norlys employees with a focus on a healthy work life, a good work environment and high job satisfaction – now and in the future. This is framed in our policy for a good work life at Norlys. The key principles of the policy are described in more detail in the following sections.

An attractive workplace

Our ambition is to have one of the highest levels of job satisfaction in Denmark as well as high employee well-being, good working conditions and room for everyone to thrive and develop. Norlys has a proactive work environment culture with a firm focus on prevention, and continuously strives to ensure the best possible conditions for our employees.

A flexible work life

Norlys is an ambitious company that expects a lot from its

employees, which is why we make it a priority to provide conditions that help them succeed in their work. Because we believe that flexibility is the key to high job satisfaction, we offer flexible working hours and allow our employees to work from home whenever possible. For those of our employees who have jobs that cannot be done from home, we are exploring other ways to provide flexibility.

Opportunity to take leave

Well-being is a high priority in Norlys, so if a leave of absence could contribute positively to the well-being of our employees, and it can fit into the work situation, Norlys is willing to accommodate our employees' wishes.

Working hours

Norlys is committed to complying with laws and guidelines in relation to the number of working hours to protect employee well-being and health. The Danish workforce is covered by the Danish Salaried Employees Act, collective

bargaining agreements, ILO rules and EU guidelines on working hours, while international employees are subject to local legislation in their respective countries.

As Norlys delivers critical infrastructure, overtime and on-call shifts may occur, but we aim to avoid systematic overtime. All overtime must be in compliance with collective bargaining agreements, employment contracts and applicable legislation. Overtime pay is either included in the employee's base salary, is compensated as financial compensation or time off in accordance with applicable collective bargaining agreements.

Adequate wages

In Norlys, we want to ensure that employees who do the same type of work are paid fairly regardless of gender and background. Norlys complies with currently applicable legislation and collective bargaining conditions. In addition, Norlys carries out an annual salary assessment to ensure fair and competitive wages. For employees covered

by the 'Industriens Overenskomst' collective bargaining agreement, the salary negotiations are conducted on a collective basis.

When Norlys does well, our employees should benefit too. Therefore, all employees in Norlys are covered by a bonus scheme which is paid when selected targets are fulfilled. Everyone receives bonuses according to transparent principles and all bonus schemes are subject to a cap.

Freedom of association and collective bargaining agreements

In Norlys, we respect and promote human rights in all activities. This includes freedom of association and collective bargaining agreements as laid down by the UN and the ILO.

In Denmark we have freedom of association, and membership of trade unions and other associations is not a matter which concerns Norlys.

Secure employment conditions

It is important to us that all employees feel secure and comfortable in Norlys, so we strive at all times to promote good conditions at work and beyond.

All Norlys employees must have an employment contract, specifying employment rights, including trial period, terms of severance, pension etc. To ensure secure employment conditions, Norlys also offers a wide range of benefits to employees such as health insurance and group life insurance as well as collective insurance that provides payout in the event of critical illness.

Read more in section S1-9 Social protection.

S1-1/19 | In 2024, the policy covered all wholly owned companies and Norlys Fibernet. Telia Mobil Danmark is covered by the policy as at 1 January 2025.

Employee involvement

S1-2

The active engagement of employees is crucial for Norlys' competitiveness, well-being and a good work environment. Below is a description of the most important formalised collaboration processes in Norlys.

Cooperation Committee

Processes for engagement

S1-2/25

Employee representation on the Board of Directors of Norlys a.m.b.a. is ensured through a voluntary scheme approved by Norlys' Cooperation Committee. The Cooperation Committee acts as a forum for cooperation between management and employees across Norlys and focuses on work and staff matters of general importance. Individual cases are not discussed, only principles and directions.

The cooperation basis for the Cooperation Committee is formalised in writing and available on the intranet. The agreement is up for renewal in 2025, when three new cooperation committees will be established.

Perspectives from employees

S1-2/27

The committee discusses issues of a general nature within Norlys' area of competence, and the committee must, among other things, be involved in/informed about the following matters:

- Norlys' overall targets and strategies
- Principles for working and welfare conditions and principles for Norlys' staff policy
- Implementation of transformations, including rationalisations, efficiency measures, organisational changes and adaptations
- Principles and plans for well-being
- Ensure that all employees are treated with dignity and have equal opportunities and rights in their employment

The committee does not consider issues related to collective bargaining agreements and local agreements, which are normally determined through negotiation.

Norlys' health and safety organisation

Norlys' health and safety organisations in the individual companies are strategically managed by a Management Environment Committee, which develops framework policies for the tactical and operational level (health and safety groups).

Information about health and safety, including reporting of work accidents, psychological work environment and evacuation plans, is available on our intranet. Safety during the onboarding and training of new employees, including temporary workers, is a high priority to ensure that they get off to a safe start at Norlys. Elnetselskabet N1 uses SAFE, a quality management, reporting and case management system.

Norlys' health and safety representatives are employees who are elected by their colleagues to represent their health and safety interests. They act as a link between employees and management and work to create a safe and healthy work environment. The representatives collaborate with management to identify potential risks and participate in decision-making processes that can improve the work environment at Norlys.

Norlys' job satisfaction survey (NOA)

At least once a year, Norlys conducts a job satisfaction survey (NOA), measuring employee motivation, loyalty and well-being. The survey gives employees the opportunity to anonymously share their experience of working at Norlys.

The NOA survey is an important tool to highlight what promotes job satisfaction, so we can take action to improve it and strengthen our ambition to be an attractive workplace. The survey is based on Ennova's (external survey provider) standard question framework, supplemented by Norlys-specific questions on values, governance principles, diversity, inclusion and relevant company matters.

When the NOA results are available, all managers review them with their own team. Each team discusses the results of the NOA survey and jointly designs an action plan with activities that can help improve or maintain a high level of job satisfaction.

People Review

People Review is Norlys' annual process to assess the performance and potential of managers and employees. People Review contributes to establishing a common language about performance and behaviour and provides a systematic overview of the organisation's strengths and potential successors for critical positions. Feedback from the People Review is communicated to the employee during the Performance & Development interview, where future goals and development plans are discussed.

The Performance & Development interview focuses on skills development and consists of two parts:

- A retrospective part, where the manager provides feedback on the employee's behaviour and performance in the past year as well as assessing the employee's potential.
- A forward-looking part where the manager and the employee discuss the employee's well-being, motivation and identify goals and development areas for the coming year.

The discussion forms the basis for ongoing dialogue and feedback between managers and employees, with follow-up on relevant feedback. The manager and employee follow up on development opportunities and needs of the employee and discuss how Norlys can best support that development.

Cooperation Committee

Norlys' health and safety organisation

Norlys' job satisfaction survey (NOA)

People Review

Direct/indirect engagement

S1-2/27a

Engagement in the Cooperation Committee is facilitated through employee representatives and the cooperation committee structure reflects the organisational structure of Norlys. As a consequence of the new organisational structure, three cooperation committees are established in Kundeselskabet Norlys, Elnetselskabet N1 and Norlys Fibernet, respectively. The local cooperation committees ensure closer cooperation in the individual companies while contributing to cohesion across the Group.

The management of each company discusses the composition of the new cooperation committees with current employee representatives to ensure broad representation on the committees. Trade union representatives are automatically members of the Cooperation Committee. If there are more trade union representatives than there are seats, representatives are elected from among them.

Once the cooperation committees are in place, the companies inform their organisations about the new structure. The first meeting of the new cooperation committees will be held in January 2025.

Frequency

S1-2/27b

Cooperation committees meet as needed, but at least once a quarter. The chair, vice chair or a majority of the employee representatives may demand that a meeting be convened, stating the desired agenda items.

Before any major changes are implemented, dialogues take place with trade union representatives where input to the process and suggestions for improvements are discussed. The Cooperation Committee can establish working groups to work on specific topics.

Person responsible

S1-2/27c

The CEOs of the individual companies act as chairs of the cooperation committees. In addition, two annual dialogue meetings are held between the Norlys Group's CEO, SVP of Culture & Leadership and two representatives from each company's Cooperation Committee. These meetings promote mutual dialogue and strengthen cohesion across the Group. The Cooperation Committee covers companies that are wholly owned by the Norlys Group and Norlys Fibernet A/S.

Other or global framework agreements

S1-2/27d

We refer to the Cooperation Agreement between the Confederation of Danish Employers and the Danish Trade Union Confederation: Cooperation Agreement – Cooperation Board

Norlys' health and safety organisation in the individual companies consists of employee-elected health and safety representatives and appointed health and safety managers. Health and safety groups handle the day-to-day health and safety work and liaise directly with colleagues.

Strategic and tactical matters are handled by the Health and Safety Committee of each company. The Health and Safety Committee typically consists of management representatives, health and safety representatives and one or more health and safety specialists. Operational matters are handled by health and safety groups, who plan and manage health and safety initiatives at the workplace and ongoing contact with colleagues.

The health and safety organisation covers the Norlys Group, Kundeselskabet Norlys, Norlys Fibernet and Elnetselskabet N1.

The individual companies determine the frequency of meetings for the top level of the health and safety organisation, which typically meets two to four times a year. The health and safety groups meet at least every three months or as needed. Work accidents and near misses are reported on a regular basis.

Health and safety is a management responsibility. Each company in Norlys has appointed a VP who is responsible for health and safety in the company.

The health and safety work is inspired by Vision Zero, a strategy that aims to eliminate all work-related accidents and diseases. Vision Zero is supported by many international organisations, including the International Labour Organization (ILO) and the International Social Security Association (ISSA).

The NOA survey is a measurement of the job satisfaction among Norlys' employees.

In 2024, the NOA survey was conducted in the Norlys Group, Norlys Fibernet, Kundeselskabet Norlys, Elnetselskabet N1, OpenNet, Automize, Norlys Energy Trading and Mjølner Informatics.

The NOA survey is conducted at least once a year.

The VP of Norlys Group Culture & Leadership has the overall responsibility for the framework and agreements relating to the job satisfaction survey. The VPs of People & Culture in the individual companies have operational responsibility for conducting and following up on the results of the job satisfaction survey.

People Review is a direct dialogue with the employee.

People Reviews are held in all wholly owned companies.

The People Review is conducted every year in the first quarter.

The VP of Norlys Group Culture & Leadership has the overall responsibility for the framework and agreements relating to the People Review. The VPs of People & Culture in the individual companies have operational responsibility for ensuring that managers complete the People Review.

Actions and resources related to creating a flexible work life

S1-4

In addition to the matters mentioned in our political commitment, see S1-1 on page 54, other initiatives contribute to creating good and flexible working conditions:

S1-4/37

Management responsibility

The management is responsible for maintaining a close relationship with the individual employee, taking into account the circumstances of each employee and using the tools and procedures available to us in the best way possible. Creating flexible conditions always takes place in a dialogue between the individual employee and their immediate manager.

Flexibility when children are sick

In our core companies, we have removed the limit on the number of days employees can take paid time off to care for sick children. This arrangement is based on mutual trust and responsibility, with employees balancing the needs of the child with their work commitments. We trust our employees to be able to organise their absence to accommodate both family and work commitments, and we are constantly working to improve flexibility.

Maternity/paternity and parental leave

In 2023, it became possible to take an additional two weeks of parental leave, and the terms have been changed so that single parents, LGBT+ families and other family constellations can now take some of their parental leave with full pay. Read more about maternity/paternity and parental leave in section S1-15 Work-life balance metrics on page 69.

Senior employees

Norlys' senior scheme aims to ensure that our employees can adjust their working conditions to their changing wishes and needs as far as possible as they approach retirement age. This means that they can make individual agreements on, for example, reduced working hours, changed work tasks/job function, gradual reduction in working hours and time off for treatments to the extent that the daily operation and management of Norlys allow it.

How we minimise negative impacts

S1-4/41 | Norlys is committed to complying with applicable laws and human rights obligations and minimising the risk of employees experiencing negative impacts from our practices. As described in the section on health and safety, we have a number of preventive health measures in place to reduce risks, and the section on employee involvement outlines the measures in place to ensure that employees are involved in decisions that may have a negative impact on their working conditions.

In the event of significant changes in working conditions, for example following the reorganisation of Norlys in 2024, management is committed to supporting employees affected by the changes. This includes change management and ongoing dialogue. Through structured HR processes, we have worked to lessen some of the negative consequences that the restructuring has inevitably had for some of our employees.



Targets related to good work conditions

S1-5

Employee job satisfaction and well-being

We measure our success in terms of ensuring good working conditions in our regular employee satisfaction survey. Here a series of questions are being asked which gives an indication of employee satisfaction and well-being, including which areas Norlys should focus on to improve job satisfaction. It is important for us to have a data foundation that can guide us in the dialogue about where to focus our efforts to ensure that Norlys is a workplace with a high level of well-being and employee satisfaction.

The survey questions cover the following topics:

- Job satisfaction
- Community
- Reputation
- Overall management
- Immediate manager
- Cooperation
- Working conditions
- Job content
- Salary and employment conditions
- Learning and development

The results from the 2024 NOA survey show a decline in job satisfaction in Norlys from a score of 77 in 2023 to 74 out of 100. However, the decline is acceptable given the many changes implemented in 2024 and the associated uncertainties. The job satisfaction survey has a very high response rate of 96%, meaning that 3,315 employees took part in the survey.

See scope, process, frequency, follow-up etc. for the NOA survey in section S1-2 Employee involvement on page 55.

Case

Not enough deep conversations among men

In 2024, the mobile company Call me, which is part of Telia Mobil Danmark, launched a campaign entitled 'Apropos', which focuses on loneliness among men. The campaign is part of Call me's mission to promote meaningful connections between people, with a particular focus on deep conversations among men. More than 25% of Danish men rarely or never have a deep conversation with other people. The campaign supports our shared belief in creating strong human connections – both digitally and face to face.



Processes to remediate negative impacts and channels for own workers to raise concerns

S1-3

S1-3/32a-d | Norlys has established several channels to ensure that employees can raise concerns about problematic conditions or inappropriate behaviour.

We want to foster a high-trust culture where employees speak out openly if they detect non-compliance with Norlys' policies – including complaints related to employee conditions – without any risk of retaliation.

The following channels are available to all employees:

- Employees may contact their immediate manager – or if it is not appropriate to contact the immediate manager, People & Culture in the individual companies or senior management.
- The whistleblower system, which can be found at www.norlys.dk. The whistleblower system is anonymous and available for internal as well as external individuals to report concerns. The scheme is described in section G1 on page 79.

To reduce the number of accidents, employees record both accidents and near misses – situations that could have resulted in an accident. We actively encourage employees to report potentially dangerous conditions, which contributes to a strong safety culture. The high number of recorded near misses indicates that employees feel comfortable using our processes. Incidents are reported using service management software which ensures easy and reliable reporting.

Norlys also uses the job satisfaction survey and the statutory workplace assessment to give employees a voice when it

comes to their work environment and well-being. If our employees want to make an anonymous report or report serious concerns, they can use our whistleblower system. The channels are supported by the work of the Cooperation Committee, the health and safety organisation and through employee representation on the Board of Directors, among other things. Information about the channels is communicated via the intranet, employee handbook, health and safety organisation, management hub and in policies. The whistleblower system is available at norlys.dk

Complaints about abusive acts, discrimination or bullying

To ensure that employees who feel abused, discriminated against or bullied are heard and that cases are handled correctly, we have developed a management tool for dealing with abusive acts. The tool guides managers in the dialogue with employees and describes the reporting process as well as the involvement of union representatives and health and safety representatives and, if necessary, management. In addition, a guide is available in the health and safety section of the companies' intranet that explains how employees should proceed if they experience or witness abusive behaviour in Norlys.

Tracking, follow-up and efficiency

S1-3/32e | As per section G1-1 on page 79, there is an established process for handling reports made via the whistleblower systems. It is a regular topic at Norlys' quarterly meetings of the Risk and Audit Committee. The Whistleblower Committee reports regularly to the Board

of Directors of Norlys a.m.b.a. about the general nature of the reports (system records). This reporting is used to identify trends over time and evaluate the effectiveness of the system as part of the due diligence process.

In addition, the information obligation of the Cooperation Committee ensures that general employee issues are addressed. Employee representatives on the Cooperation Committee and in the health and safety organisation help to identify and manage inappropriate processes that can have a negative impact on employees.

The annual anonymous employee satisfaction survey includes questions on trust in management, inclusion and loyalty. The results provide insight into employees' perceptions of satisfaction and trust in the structures and processes that support their working conditions.

Protection

S1-3/33 | The Danish Whistleblower Protection Act (Act No. 1436 of 29 June 2021) and the Whistleblowing Directive (EU) 2019/1937, supported by Norlys' whistleblower policy, protect those who use the scheme against retaliation (section G1-1 on page 79). In addition, employee representatives, including union representatives and health and safety representatives, are afforded special protection against termination and retaliation under collective bargaining agreements, Danish health and safety legislation and executive orders on safety and employee representation. This protection ensures that representatives can perform their functions without fear of negative consequences.

Equal treatment and equal opportunities for all

Norlys is committed to equal treatment, diversity and inclusion. Not only is it the right thing to do, it also expands the talent pool, strengthens our culture and strengthens our competitiveness in a complex market. Although we have launched several initiatives, we recognise that we still have a long way to go. Diversity and inclusion are deeply rooted in Norlys' philosophy, and we know that it requires a sustained effort if we are to continue to evolve.



Policies related to equal treatment and equal opportunities for all

S1-1

S1-1/17 | Equal treatment, diversity and inclusion are part of Norlys' DNA and our values: Community, innovation and responsibility. We believe that a true community is inclusive, safe and inspiring, that it is our responsibility to create room for diversity and that we innovate better when we bring all our skills into play.

This is formalised in Norlys' policy for a good work life, which aims to ensure the best possible conditions for our employees. The policy guides our daily work, supports good processes and helps identify challenges and risks to create optimal working conditions.

An inclusive community

In Norlys, we believe that diversity is a natural part of a strong community. We want to be a workplace with room for everyone regardless of gender, age, ethnic background, religion, sexual orientation or disability. Diversity requires inclusiveness, curiosity and the courage to be different, and no one should experience discrimination – in Norlys there is room to be yourself. To us, it is about recognising each other's differences, seeing the individual potential and ensuring equal opportunities for all. Both managers and employees have a shared responsibility to create spaces where diversity can thrive.

Diversity strengthens both our company and work environment by bringing different perspectives and ideas together. By recruiting broadly, we gain access to more talent and ensure innovation, competitiveness and value creation. We want diversity to be reflected at all levels of the organisation, and we aim to build a pipeline of diverse talent at both employee and management levels.

Gender equality

We believe that a balanced gender representation creates a better work environment. We want our workforce composition to reflect the demographics of society, and gender distribution is part of this. This ambition, together with the gender balance targets in the Group's management team, is set out in the policy for a good work life at Norlys.

S1-1/19

What and who does the policy cover?

In 2024, the policy covered all wholly owned companies and Norlys Fibernet. Telia Mobil Danmark is covered by the policy as at 1 January 2025.

Who is responsible for the policy?

To ensure compliance with this policy, the policy for a good work life at Norlys is anchored in the Norlys Group under the VP of Culture & Leadership, who is responsible for updating and improving the policy on an ongoing basis. The VPs of People & Culture, together with the CEOs of the individual companies, are responsible for ensuring compliance with the policy in the companies that are covered by the policy.

Stakeholder engagement in policy development

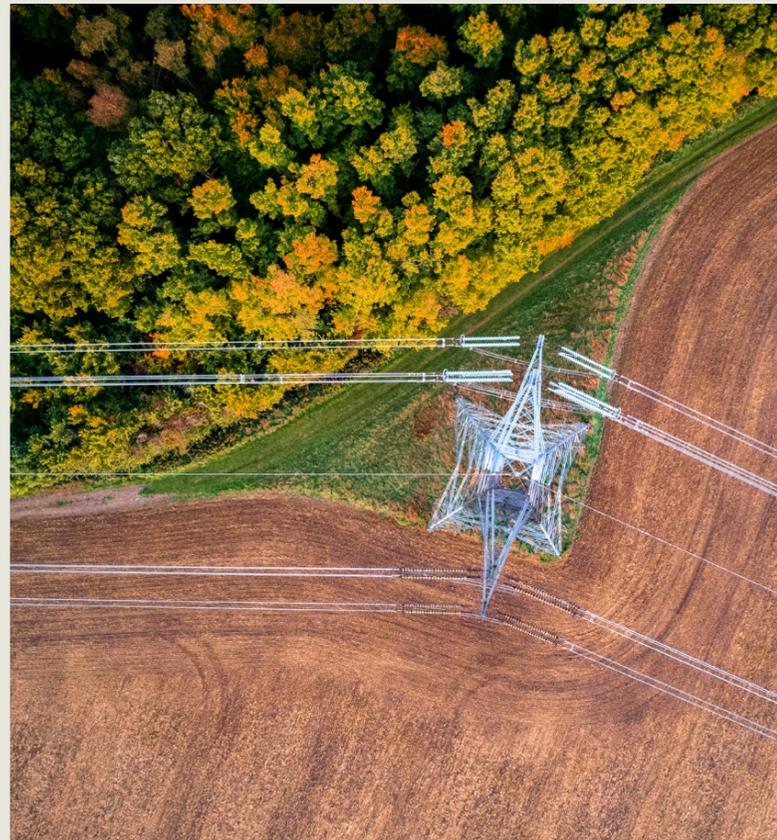
The policy was discussed with employees in the Cooperation Committee during the drafting phase and subsequently shared with the Cooperation Committee. It was then approved by the then Group Management and subsequently discussed in the Governance and Competence Committee under the Board of Directors of Norlys a.m.b.a. Updates to the policy are sent to the Cooperation Committee for information.

Case

Used electricity meters create value on multiple fronts

In 2024, Elnetselskabet N1 started a socially sustainable partnership with Specialområde Autisme in Tørring, an institution for people with autism under the Central Denmark Region. We donate used electricity meters, and in the institution's workshop, users with autism separate and sort the electricity meters into their different components.

The work helps bring structure into the everyday lives of the users by providing meaningful routines where they can develop their social and practical skills in a safe environment. At the same time, the project ensures that materials from the electricity meters are recycled efficiently.



Communicating politics

The policy is sent via the companies to all managers and published on the Norlys companies' intranet where Norlys' policies are available to all employees. The policy is also publicly available on our website www.norlys.dk.

Human rights obligations

S1-1/20a | In Norlys, we respect human rights in all our activities. We also respect the labour rights of our employees by complying with internationally agreed guidelines, including the Universal Declaration of Human Rights (1948), the UN's International Bill of Human Rights, the International Labour Organization's (ILO) conventions and recommendations on human rights and decent work, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the UN Global Compact Principles and the EU guidelines on labour rights, In addition, we comply with the EU Social Charter, the European Convention on Human Rights and the Charter of Fundamental Rights of the European Union. These commitments are set out in our policy for a good work life.

S1-1/20b | Norlys works systematically to involve employees to ensure good working conditions, equal treatment, equal opportunities and a healthy and safe workplace. The related cooperation processes are described in more detail in S1-2 Employee involvement.

Compliance with international standards

S1-1/21 | Norlys follows the Danish Consolidation Act on Working Environment, which is based on international regulations and EU directives that set minimum standards for health and safety in the workplace. These directives include risk assessment, health and safety management and protection of workers. Denmark has ratified several ILO conventions on health and safety, which means that we are required to implement their provisions in national legislation. The ILO's focus on social dialogue and cooperation between employers and workers is a central part of these principles. These international rules and standards help ensure a safe and healthy work environment in Denmark

and support the legislative goal of protecting the health and safety of workers.

Human trafficking, forced labour and child labour

S1-1/22 | Norlys does not tolerate child labour or forced labour, and we are therefore committed to ensuring that it does not happen in Norlys. We comply with the principles laid down in ILO Convention No. 138 concerning the minimum age for employment and No. 182 concerning the elimination of child labour. Norlys also respects the principle that dangerous work which risks affecting physical, mental or moral health and safety is prohibited for children under the age of 18. We respect the minimum working age and have no employees under the age of 15. Norlys does not accept forced labour, including human trafficking and slave labour, for example by imposing strict requirements on suppliers and external partners. These commitments are deeply rooted in our policy regarding a good work life.

Policy or a management system to prevent work accidents

S1-1/23 | Norlys' health and safety policy contains guidelines for targets, metrics and reporting on work accidents. We use a health and safety management system based on Vision Zero and management system principles such as organisation, management commitment, policy, targets, systematic follow-up, learning, communication and continuous improvement. However, the health and safety management system is not certified. See S1-2 Employee involvement on page 55 for a more detailed description of Norlys' health and safety organisation.

Zero tolerance for discrimination

S1-1/24a-b | Norlys does not tolerate any form of discrimination, different treatment or abusive behaviour. No one should feel discriminated against on the basis of race, ethnic origin, colour, gender, sexual orientation, gender identity, disability, age, religion, political belief or social background. We encourage all employees to act if they experience or witness abusive or discriminatory behaviour from colleagues or managers in Norlys. They can do so either by approaching their immediate manager or People &

Culture, or by using Norlys' whistleblower system, where they can anonymously report their experience. These commitments are also set out in our policy.

Special needs

S1-1/24c | In addition to our general commitments to equal treatment and equal opportunities, our policy contains commitments that ensure inclusion and affirmative action for employees from particularly vulnerable groups in our own workforce. We strive continuously to create a positive framework for age diversity, as we believe that the sharing of learning and innovation between generations is very valuable. That is why we focus on creating conditions that meet different needs throughout our employees' work life, including promoting flexibility in different stages of their lives.

In Norlys, there must be room for everyone, including employees with physical or psychological needs. We strive to adapt working conditions and remove barriers so that employees with disabilities can thrive and use their skills. We aim to have a close dialogue with employees about special needs to provide the best possible support. In case of sudden illness, we respond quickly by providing help and support through ongoing dialogue.

Due diligence on policies

S1-1/24d | When the policy has been approved, see S1-1/17e, the policy is reviewed by the VPs of People & Culture in the companies that are covered by the policy. All managers are informed about the policy, and employees are informed via the intranet. The policies are updated annually. It is the managers' responsibility to make their employees aware of the existence of the policy and ensure compliance with the policy. The section on abusive acts, discrimination or bullying contains procedures for dealing with abusive behaviour, discrimination etc.

Actions and resources related to equal treatment, diversity, equality and inclusion

S1-4

S1-4/35-37 | To ensure that our values and our targets in terms of equal treatment, diversity and inclusion are implemented in all our activities, we work with management responsibility, an inclusive culture, diversity and equality in the workforce.

Management responsibility

Managers play a critical role in developing a diverse and inclusive organisation. We have strong leadership principles, we measure managers' ability to ensure the safety and inclusion of their employees and we ensure that robust processes are in place to address inappropriate behaviour. In 2023, all managers completed Inclusive Leadership and Culture training, where they learned about privilege, psychological safety and unconscious bias, and were given tools to help them create an inclusive culture. Managers extended the training to their employees to embed the initiative in the corporate culture. That same year, we developed training materials for managers to help them deal with unconscious bias during People Review interviews. This builds on previous training and supports the work on fair assessment of employees.

In 2024, People & Culture focused on other tasks of great importance to our employees in the transformation process brought about by the reorganisation in the new company structure. In 2025, the work will be revisited and efforts prioritised in light of the new organisational structure.

Diversity in top management

Ensuring diversity in the top management of our companies is a challenge for Norlys. Our distribution is currently not representative, which poses a risk in terms of attracting talent and representing the demographics and diversity of our customers. To address this, we have established a Diversity & Inclusion Board (D&I Board) composed of CEOs and VPs of People & Culture from our companies and headed by the SVP of Group Culture & Leadership and the Group CEO. The D&I Board ensures that D&I efforts are integrated into our companies' business strategies and operational practices.

Equal opportunities in the recruitment process

We continuously strive to increase diversity in the recruitment process. Dialogue with People & Culture helps managers identify bias, and we use inclusive language in job ads to attract a diverse pool of candidates. We also encourage applicants not to include pictures in their CVs.

Focus on diversity and inclusion at Pride events

It is important to us that no employee experiences discrimination. That is why we are committed to the rights of LGBT+ people and launch internal activities that align with general pride events. We organise various activities with a focus on diversity, including talks, presentations and articles on the intranet.

Age diversity and flexibility for senior employees

At Norlys, we are continuously working to create the best environment for age diversity, because we believe that collaboration between generations can drive learning and innovation. We want to ensure that we offer working conditions that meet the needs and provide the flexibility our employee groups need in the different stages of their lives. For our senior employees, we have a flexible scheme that allows us to adapt the working conditions to the individual employee's needs to retain experience and know-how in the company – as long as it benefits both the individual employee and Norlys.

New leadership principles with a focus on diversity and inclusion

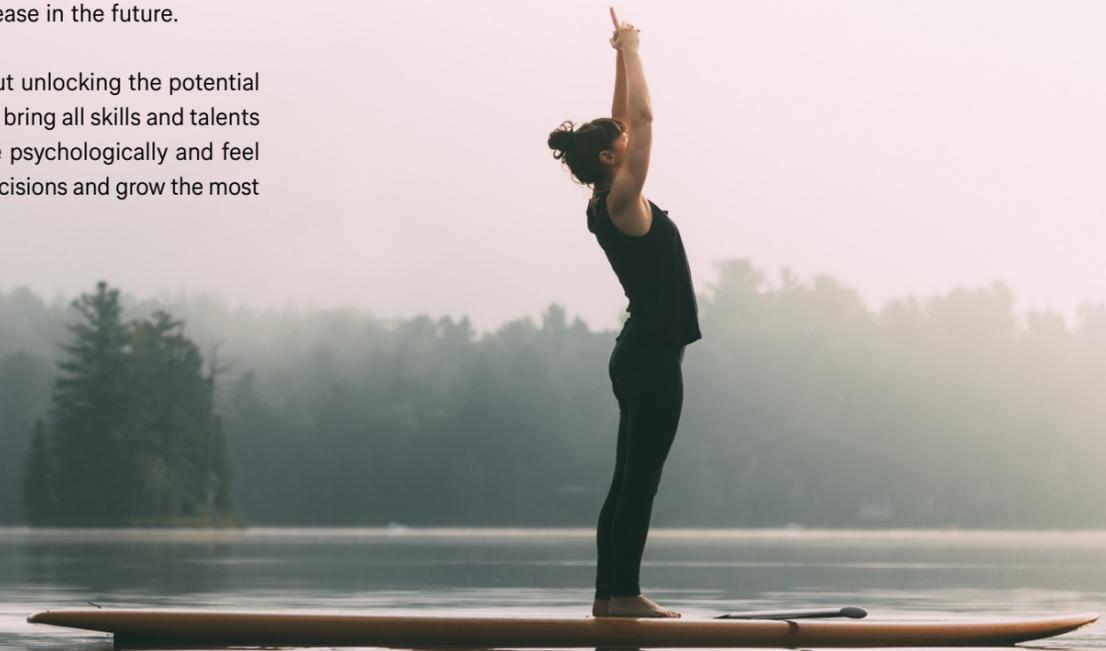
In continuation of our strategy plan 2024-2027, we have adapted Norlys' leadership principles. In this context, we have highlighted diversity and inclusion as essential elements of our leadership approach.

A shared view of leadership has always been a crucial part of what binds us together, and its importance will only increase in the future.

One of the three leadership principles is about unlocking the potential of each employee: "We will only succeed if we bring all skills and talents into play. People flourish when they feel safe psychologically and feel recognised and included. We make the best decisions and grow the most

when we see the world differently. Diversity is a superpower, which we need to embrace in all our teams."

The leadership principles were presented to all managers at the first management meeting in 2024. The leadership principles are incorporated into our job satisfaction survey and People Review process and will be further implemented in 2025.



Ambition: Dare to succeed

We are here to unlock Norlys' full potential in a committed community, and we do not let the fear of failure hinder our ambitions. Being a manager at Norlys is a promise of progression. We think like a challenger and are driven to change the status quo. It is our responsibility and mandate to take the lead and be brave enough to speak up and get things done.

Empowerment: Make people shine

We will only succeed if we bring all skills and talents into play. People flourish when they feel safe psychologically and feel recognised and included. We make the best decisions and grow the most when we see the world differently. Diversity is a superpower, which we need to embrace in all our teams.

Execution: Time matters

Time is our most important resource. We think before we act, and we adjust our plans as we learn more or the world changes. We keep our promises and see projects through to completion. Clear priorities and non-priorities are key to achieving our ambitious agenda.



Targets related to equal treatment, diversity, equality and inclusion

S1-5

Employee experience of inclusion and diversity via the job satisfaction survey (NOA)

S1-5/44c | We measure our ability to be inclusive and embrace diversity in our regular employee satisfaction survey. In it, a number of questions are asked that give an indication of the culture in Norlys, including what Norlys should focus on to create a more inclusive culture. Our goal is to keep the score >85 out of 100 for all inclusiveness questions as we become a more diverse workplace. It is important to us that we have a data foundation that can guide our efforts to ensure that Norlys is a diverse workplace where everyone feels safe and are treated equally.

Scope, process, frequency, follow-up etc. for the NOA survey are described in section S1-2 Employee involvement on page 55.

Gender equality

In Norlys, we believe we can make the workplace better by creating a work environment with a balanced gender representation. In general, we want our workforce composition to reflect the demographics of the surrounding community, and gender distribution is part of this.

We have not yet achieved the gender balance we are striving for, so several initiatives have been launched to promote gender diversity. Norlys has the following gender balance objectives for leadership positions in the Group's management team:

Management body	Target numbers for the under-represented gender*	Achieved in
Board of Directors	40% / 60%	After the election to the Board of Directors in spring 2031 (covers two election periods)
Executive Board	40% / 60%	2030
Direct reporting to the Executive Board	40% / 60%	2030

* Based on the rules set out in Act No. 568 of 10 May 2022 on targets and policies to increase the proportion of the under-represented gender, we operate with two genders, men and women, which are determined by social security numbers.

S1-5/47a | The target numbers are defined by the Executive Board in cooperation with the VPs

& Inclusion Board will monitor progress and launch initiatives to ensure we reach our targets.

S1-5/47b | The target numbers are discussed at the monthly Core Leadership Team whiteboard meeting. The new Diversity

The status of the target numbers is described in section S1-9 Diversity metrics on page 67.

Health and safety

Health and safety is given high priority in Norlys, and we work hard to prevent work accidents and create a safe environment for our employees. It is not just about complying with legislation, it is also about living up to our values and responsibility towards each other. A safe work environment is the foundation for employees to thrive, develop and perform at their best. When our employees thrive, it strengthens both our community and the company as a whole.

Norlys' business model encompasses both energy supply and much of the digital value chain. Many of our employees work with the operation, maintenance and expansion of the electricity grid, coax, mobile and fibre networks. This work involves potential risks, especially when doing excavation work or working with technical installations, heavy machinery, electricity and high voltage. As a result, the health and safety of our employees is a key focus area for Norlys.

Policies related to health and safety

S1-1/17

Norlys aims to create a health and safety culture with a high level of prevention to ensure employee well-being and avoid work-related injuries and illnesses. Our health and safety procedures are a strategic focus area that prioritises safety and security for all employees.

These overall commitments are set out in our policy for a good work life and concretised in our health and safety policy. The purpose of the health and safety policy is to develop and maintain a good physical and psychological work environment where employees thrive and no one gets sick from work, including:

- Management involvement in health and safety programmes and resource allocation.
- Prioritising health and safety over productivity.
- Ambitious goals that exceed legal requirements and continuous improvements.
- Regular communication and active employee involvement in risk management and prevention.
- Prevention by design to reduce injuries and exposures.
- Reporting is systematised and reviewed at regular whiteboard meetings.

Norlys aims for zero work accidents through specific objectives, and we have procedures for reporting accidents and processes for internal learning in case of accidents. We measure the number of work accidents and near misses and continuously update our health and safety policy, objectives and procedures. The effect of the policy is monitored through a number of processes, which are described in more detail on the following pages and under 'Health and safety organisation' on page 55.

What and who does the policy cover?

In 2024, the policy covered all wholly owned companies and Norlys Fibernet. Employees from temporary employment agencies working under Norlys' management are also covered by the policy.

Who is responsible for the policy?

To ensure compliance with the health and safety policy, the policy is anchored under the VP of Group Culture & Leadership, who is responsible for updating and improving the policy on an ongoing basis. The VPs are responsible for ensuring compliance with the policy in our companies. It is the responsibility of managers to make their employees aware of the policy, ensure compliance and integrate its principles into the daily work.

Other commitments

The health and safety policy is inspired by Vision Zero, whose principles strive for a health and safety culture with a high level of prevention that minimises the number of accidents.

Stakeholder engagement in policy development

The health and safety policy is developed in cooperation between management and health and safety representatives. Norlys' health and safety organisation ensures continuous evaluation and updating of activities and guidelines. This helps ensure compliance with policies, guidelines and legislation throughout the company.

Communication on the policy

Managers are informed of the policy via the individual companies' health and safety organisation and published on Norlys' intranet, where Norlys' policies are available to our employees. The policy is also publicly available on our website www.norlys.dk.

Actions and resources related to health and safety

S1-4

S1-4/37 | In addition to the established processes described in S1-2 Health and safety organisation and S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns, the following initiatives were launched in 2024 to reduce the number of accidents:

Updated safety procedures

The focus on lost-time accidents has led to a requirement for reporting to the VP of the relevant health and safety organisation and performance of accident analyses as described in S1-5/38b.

Safety procedures

S1-4/38 | In addition to the above, we have the following safety procedures and supporting activities:

- Learning catalogues that document and provide lessons learned from accidents and near misses.
- Focus on safety in connection with onboarding of new employees, including non-employees.
- Workplace assessment reports carried out in compliance with legislation.
- Established crisis response with associated training.
- Reporting of work accidents in the EASY system.
- Registration and assessment of chemical products in accordance with the Danish Working Environment Authority's guidelines via an online chemistry database with open access for employees.
- Annual health and safety discussions at company and group level with status on targets, action plans and future initiatives, including communication about new initiatives.

In the event of an accident

Although Norlys strives for zero accidents, accidents do happen. In such cases, the employee is covered by insurance. In the event of lost-time injuries and serious incidents, an accident analysis must be performed. The VP of the health and safety organisation must be informed within 24 hours of reporting of the accident, a preliminary accident analysis is performed within two days and a final accident analysis is completed within three weeks of reporting of the accident.

Health plans

In recent years, we have prepared annual health plans with targeted initiatives and activities.

The following initiatives were launched in 2024:

- Training of health ambassadors and establishing a network of ambassadors to ensure local ownership of health initiatives.
- 'HjerneRO for ledere': A four-week online programme with psychologists from MindCamp aimed at strengthening the mental health of managers.
- Healthy eating campaign in canteens.
- Walkathon and Walk for Clues: Two step competitions that combined physical activity with fun tasks.
- Talk about the importance of sleep for well-being.
- Holiday balance news: Pre- and post-holiday campaigns to support mental relaxation.
- DHL relay: Record participation by over 1,000 employees.
- Velliv health initiative: Initiatives aimed at reducing sick leave.
- Active Weeks: Combined mental and physical training.

Targets related to health and safety

S1-5

Norlys has procedures in place for reporting work accidents and near misses as well as processes for internal lessons learned. We continuously measure and evaluate our performance against benchmark targets which are followed up on weekly. Incidents are reported and discussed at scheduled meetings, and the health and safety policy is continuously updated to remain dynamic and relevant. Our safety training covers own employees and non-employees performing work for Norlys. We aim for zero work accidents, an ambitious target in an organisation with several thousand employees. The status of the targets can be found in section S1-14 Health and safety metrics.

The targets are defined in the health and safety organisation in cooperation between top management, health and safety managers and health and safety representatives.

These targets are followed up on at company whiteboard meetings and monthly across all our companies, where incidents are discussed and possible actions are decided.

The increased focus on lost-time accidents has meant that Norlys Fibernet has reduced the number of lost-time accidents by approximately 28% compared to 2023, and that accidents not resulting in lost time have declined by approximately 43%.

Case

Reduction of work accidents in Norlys Fibernet

Safety is an integral part of everyday life in Norlys Fibernet, and several years of systematic efforts have now yielded significant results. The continued focus on strengthening the safety culture through health and safety cafés, theme days and targeted training led to a considerable reduction of 28% in the number of lost-time accidents and 43% in the number of non-lost-time accidents in 2024.



Norlys' workforce in numbers

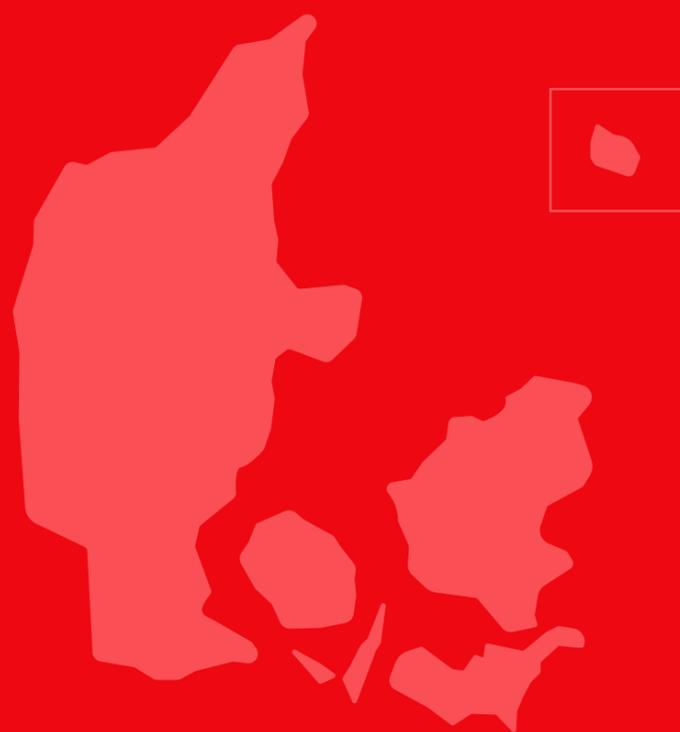


Information about our employees

S1-6

Employee distribution

This statement only includes employee conditions in Denmark, as Norlys does not operate in other countries with more than 50 employees, and they thus constitute less than 10% of the total workforce.



Gender distribution

The number of employees increased by 19% from 2023 to 2024, mainly due to the acquisition of Telia Mobil Danmark. In 2024, 32% were women and 68% were men.

Employee distribution ¹	ESRS ref.	Unit	2023 ³	2024 ²
Female employees ⁴	S1-6/50a	Number ²	1,209	1,419
Male employees ⁴	S1-6/50a	Number ²	2,547	3,048
Employees in total ⁴ – Headcount	S1-6/50a	Number ²	3,756	4,467
Employees in total ⁴ – FTE	S1-6/50f – see our annual financial report ⁷	Number	N/A	4,135
Employee categories 2024	ESRS ref.	Unit	Women ¹	Men ¹
Total employees	S1-6/50a	Number ²	1,419	3,048
Permanent ⁵ employees ⁴	S1-6/50b i.	Number ²	1,379	2,949
Temporary ⁵ employees ⁴	S1-6/50b ii.	Number ²	40	99
Hourly paid ⁶ employees ⁴	S1-6/50b iii.	Number ²	74	124

¹ Women and men: Measured by social security number.

² S1-6/50d-i: Number: Headcount.

³ S1-6/50d-i: 2023: Balance sheet figures as at 31 December. 2024: Average over the reporting period

⁴ Employees: everyone who has an employment contract (including interns and students if they have an employment contract)

⁵ S1-6/50e – Permanent/temporary employees: All employees are treated as permanent employees, unless they are in a temporary position in which case they are temporary employees.

⁶ S1-6/50e – Hourly paid employees: employees who have varying working hours and are paid by the hour.

⁷ S1-6/50f – Number of employees assessed in the annual financial report 2024: 4,135 employees (see note 5 to the annual financial report). The figure in the annual financial report is calculated as FTEs averaged over the year, whereas in the sustainability report it is calculated as headcount. In addition, Telia was not included in the annual financial report until April 2024, whereas in the sustainability report, based on balance sheet figures as at 31 December, they will be included for the whole of 2024. Consequently, there will be a discrepancy between the calculations.

Employee turnover	ESRS ref.	Unit	2023 ³	2024 ²
Employees ⁴ who have left the company during the reporting period	S1-6/50c	Number ²	563	1,014
Employee turnover ⁷	S1-6/50c	%	15	23

² S1-6/50d-i: Number: Headcount.

³ S1-6/50d-i: 2023: Balance sheet figures as at 31 December. 2024: Average during the reporting period

⁴ Employees: everyone who has an employment contract (including interns and students if they have an employment contract) also defined as in-house/ordinary in-house employees

⁷ Employee turnover: Employees who left Norlys in 2024.

An employee is no longer employed when they have had their last day as an employee. This applies whether they have left the company voluntarily or involuntarily.

Employee turnover is calculated as follows: The sum of resigned employees / Total employees

In 2024, we had a significantly higher employee turnover than usual. The year was characterised by major organisational changes. First and foremost, we underwent a radical organisational change

which included the decentralisation of our shared functions and the acquisition of Telia Mobil Danmark. In addition, we also said goodbye to employees in our fibre and coax business areas.

Significant remarks on changes in data regarding Norlys' own workforce

In 2023, employee-related data was calculated as balance sheet figures end of December. In 2024, the employee assessments within S1-6 and S1-7 are compiled as monthly averages with data pulled at the end of each month, which may affect the basis for

comparison with previous years. Changes from 2023 to 2024 are largely due to the acquisition of Telia Mobil Danmark. As mentioned in section BP 2, Telia Mobil Danmark has not been added to the 2023 data, and so account should be taken of the fact that this affects everything from pay to employee numbers and health and safety metrics etc.

Information about non-employees

S1-7

S1-7/50c | To strengthen Norlys' flexibility, we contract with Danish temporary work agencies and construction companies to deliver some of our services. Non-employee workers in our own workforce perform a variety of tasks and therefore have a wide range of skills. Their functions encompass: Temporary workers, contractors, technicians, customer centre employees, consultants and specialists.

In 2024, we had 2,435 non-employees in addition to our own workforce of 4,467 employees. The number increased in 2024 due to the acquisition of Telia Mobil Danmark and us having several consultants working on the Telia integration and a major ongoing IT integration project.

Non-employees	ESRS ref.	Unit	2023 ²	2024 ²
Non-employees	S1-7/55a	Number ¹	2,125	2,435

¹ S1-7/55b-i: Number: Headcount.

² S1-7/55b-ii: 2023: Balance sheet figures as at 31 December. 2024: Average in the reporting period

Collective bargaining coverage

S1-8

Norlys has several different collective bargaining agreements covering different work areas. Some work areas are not covered by collective bargaining agreements. 47% of our employees were covered by a collective bargaining agreement in 2024.

Employees not covered by collective bargaining agreements are covered by the Danish Salaried Employees Act. In addition, Norlys employees who are not covered by collective bargaining agreements have a number of employment conditions that are at least similar to those required by the collective bargaining agreement.

See section S1-1 A good work life at Norlys and S1-2 Employee involvement to learn more about our work with working conditions and employee dialogue.



Collective bargaining agreement	ESRS ref.	Unit	2023 ²	2024 ²
Employees covered by collective bargaining agreements	S1-8/60a	%	52	47
The company has one or more collective bargaining agreements per EEA country with a significant number of employees	S1-8/60b	Number		>1
Employees outside the EEA who are covered by a collective bargaining agreement	S1-8/60c	Number ¹	0	0 ⁴
Employees covered by trade union representatives ^{3 5}	S1-8/63a	%	48	42
The existence of an agreement with employees on representation at a European Cooperation Committee, a Cooperation Committee for Societas Europaea or Societas Cooperativa Europaea	S1-8/63b	Number	0	0

¹ Number: Headcount.

² Balance sheet figures as at 31 December.

³ Trade union representatives: Trade union representatives and as such not health and safety representatives.

⁴ Only Denmark as an applicable EEA country.

⁵ To be covered by a trade union representative, an employee must be covered by a collective bargaining agreement and a trade union representative must have been elected for their professional area and location. As a result, there may be a difference between number of employees covered by a collective bargaining agreement and the number of employees who have access to a trade union representative.

AR 66: Employees covered by collective bargaining agreements are calculated as follows: Number of employees covered by a collective bargaining agreement / Total number of employees

AR 69: Employees covered by trade union representatives are calculated as follows: Number of employees working with labour representatives / Total employees

Diversity metrics

S1-9

Age diversity

In Norlys, the age distribution of employees is <31 years 25%, 31-50 years 52% and >50 years 23%.

Age distribution	ESRS ref.	Unit	2023 ³	2024 ³	% of total employees (2024)
<31					
Women ¹	S1-9/66b	Number ²	261	351	8%
Men ¹	S1-9/66b	Number ²	490	800	18%
Total	S1-9/66b	Number ²	751	1,151	25%
31-50					
Women ¹	S1-9/66b	Number ²	731	803	18%
Men ¹	S1-9/66b	Number ²	1,327	1,524	34%
Total	S1-9/66b	Number ²	2,058	2,327	52%
>50					
Women ¹	S1-9/66b	Number ²	219	263	6%
Men ¹	S1-9/66b	Number ²	728	776	17%
Total	S1-9/66b	Number ²	947	1,039	23%

¹ Women and men: Measured by social security number.

² Number: Headcount.

³ Balance sheet figures as at 31 December.

Diversity in top management

In Norlys, we believe that a diverse work environment creates a better workplace, and we want our workforce composition at all levels of the company to reflect the demographics of the surrounding community, including gender distribution.

Management level 2024 ¹	ESRS ref.	Unit	Total	2030 target ²
Board of Directors of Norlys a.m.b.a.				60/40 ³
Women	S1-9/66a	Number	3	
Men	S1-9/66a	Number	15	
Gender with the lowest representation makes up	S1-9/66a	%	17	
The Executive Board of the Norlys Group				60/40
Women	S1-9/66a	Number	1	
Men	S1-9/66a	Number	1	
Gender with the lowest representation makes up	S1-9/66a	%	50	
Managers reporting directly to the Executive Board of the Norlys Group				60/40
Women	S1-9/66a	Number	3	
Men	S1-9/66a	Number	5	
Gender with the lowest representation makes up	S1-9/66a	%	38	

¹ Due to organisational changes in Norlys, the management structure and thus S1-9/66a has changed, and data cannot be compared to 2023. Top management consists of the following three management layers: The Board of Directors of Norlys a.m.b.a, the Executive Board of the Norlys Group and direct reports to the Executive Board of the Norlys Group.

² Target figures for the under-represented gender

³ 2031 target, as elections to the Board of Directors are held in the first quarter 2031

In 2024, the Board of Directors of Norlys a.m.b.a. had 18 members elected by the Board of Representatives, three of whom were women. The Board is thus made up of 17% women and 83% men. The Board of Norlys a.m.b.a. is democratically elected by the Board of Representatives, so our influence on the gender balance is limited. Elections to the Board take place every four years.

The Executive Board consists of one man and one woman, meaning that the desired gender balance is achieved. Reporting directly to the Executive Board are three women and five men. We have not yet achieved a balanced gender distribution at all management levels. Therefore, several initiatives have been launched to promote diversity, including gender diversity, see S1-3 How we work with equal treatment and equal opportunities for all on page 61.

Adequate wages

S1-10

Norlys' employees must be compensated adequately for their work, and employees who do the same type of work must be paid adequately regardless of gender and background. We want the full remuneration package to be market-compliant to ensure the fairest level of compensation. Every year, a salary review is conducted for

all employees to ensure fair and competitive compensation.

All employees in Norlys receive fair compensation according to applicable benchmarks.

Employees receiving adequate wages	ESRS ref.	Unit	Total
Employees who receive an adequate wage according to applicable benchmarks	S1-10/69	%	100

S1-10/69 Adequate wages is calculated as: (Income subject to labour market compensation + Company pension + Group bonus + Commission) / Normal working hours

Social protection

S1-11

All Norlys employees must have an employment contract, specifying employment rights, including trial period, terms of severance, pension etc. To ensure secure employment conditions, Norlys also offers a wide range of benefits to employees, which are described in section S1-1 A good work life in Norlys on page 53.

We require them to always comply with applicable national legislation, to respect human rights in all their activities and to observe international guidelines. Temporary workers employed under Norlys' management follow the collective and local agreements.

The Danish workforce is protected by guarantees under the Danish Flexicurity model. All employees employed in Denmark are protected against loss of income due to illness, unemployment, occupational injury and acquired disability, parental leave and retirement.

Our international employees are subject to the laws of the relevant country.

Norlys also has agreements with various external parties, including contractors, temporary work agencies and external consultants, and in this situation, the contractual relationship is not with Norlys.

Mjølner has employees in Spain who are subject to Spanish law. However, they are covered by a health insurance policy taken out through Mjølner, which provides them with social security in the event of illness and occupational injury.

Room for everyone

S1-12

In Norlys, there is room for everyone. That is why we continuously strive to adapt the work environment, removing physical, structural and mental barriers for those of our employees who need it, so everyone can bring all their skills into play and thrive in Norlys.

Employees in flexi-jobs	ESRS ref.	Unit	2024
Employees in flexi-jobs	S1-12/79	%	0.62

The data definition has changed from being based on section 56 contracts and people in flexi-jobs in 2023 to being measured solely on the number of people in flexi-job in 2024. Data is therefore non-comparable.



Health and safety metrics

S1-14

In Norlys, we want a health and safety culture with a high level of prevention to ensure employee well-being and avoid work-related injuries and illnesses. Health and safety procedures are a high-priority strategic focus area as our employees must be able to move comfortably and safely around the workplace.

The number of accidents has decreased from 53 to 46 in 2024, which is a 13% decrease. The noticeable decrease is partly due to

the increased focus on security procedures in 2024. Read more about our work in S1-4 How we work with health and safety on page 64. We actively encourage employees to report potentially dangerous conditions, which contributes to a strong safety culture. The increased number of recorded near-miss incidents indicates that employees feel comfortable using our processes. This improves our learning, making it easier to take action to reduce accidents.

Health and safety metrics	ESRS ref.	Unit	2023	2024
Metrics				
Employees covered by the health and safety management system	S1-14/88a	%	100	100
Employees covered by personal health insurance	S1-14/88a	%	100	100
Number of incidents				
Fatalities at work ¹	S1-14/88b	Number ²	0	0
Work accidents with more than 1 day's absence ¹	S1-14/88c	Number ²	53	46
Employees' recordable cases of work-related ill health ³	S1-14/88d	Number ²		<5
Employee lost time due to work-related accidents, ill health, fatality	S1-14/88e	Days		244
Near-miss incidents ⁴		Number ²	162	215 ⁷
Safety metrics				
Work accidents per 1,000,000 working hours	S1-14/88e	Incident rate	9.3	6.6

¹ Relates to own workforce and non-employees performing work for the Norlys Group. ² Incident. ³ Number of recordable cases of work-related ill health involving acute, recurring or chronic problems caused or aggravated by working conditions/work performance including musculoskeletal, skin or respiratory disorders etc. Recognised incidents have been included. The figures for ill health are not precisely specified due to personal data. The value should therefore be seen as an indicator of how many cases there have been. Data is not available for 2023. 2024 data is provided by Arbejdsmarkedets Erhvervssikring (Labour Market Insurance)

⁴ Number of near-miss incidents is included for the following companies: Kundeselskabet Norlys, N1, Fibernet and Telia
 S1-14/88e Incident rate per 1,000,000 working hours is calculated as: (Number of work-related injuries/Working hours) x 1,000,000
 S1-14/88e Number of lost days is calculated as: Number of hours recorded/7.4 (Normal working hours for 1 work day)

Work-life balance metrics

S1-15

Read about our work with flexibility and working conditions in section S1-1 'A good work life in Norlys'.

In Norlys, we have an open and welcoming approach to the needs that may arise when employees has the desire to become parents. All employees in Denmark who meet the employment requirement are covered by the Danish parental leave act. This means that all these employees are entitled to take family-related leave, which includes maternity leave, paternity/co-maternity leave, parental leave and caregiver leave (need to care for a family member or a person in the same household). In all 100% owned companies as well as in Norlys Fibernet, we have chosen to give both mother and father/co-mother better conditions than what is required by law. Among other things, with the arrival of the new parental leave act, we have

chosen to equalise the position of mother and father/co-mother by offering both parents 16 weeks of paid parental leave.

The current Danish legislation on sick leave and loss of earnings means that all employees have the opportunity to take sick leave to care for a close family member (e.g. children, spouse/partner or parents) or apply for loss of earnings in connection with e.g. a child's chronic illness.

Foreign employees in our associated companies are subject to the laws of the country in question.

Work-life balance metrics	ESRS ref.	Unit	2023	2024
Metrics				
Employees who are entitled to take family-related leave ¹	S1-15/93a	%	100	100
Gender distribution				
Female employees ² who have taken family-related leave	S1-15/93b	%	10	12
Male employees ² who have taken family-related leave	S1-15/93b	%	8	9

¹ According to Danish law, all employees are entitled to take family-related leave.

² Women and men: Measured by social security number.

S1-10/93b Employees who have taken family-related leave is calculated as: Unique number of employees who have recorded leave in the reporting year/Number of employees (Balance sheet figures as at 31 December) divided by gender.

Compensation metrics and pay gap

S1-16

CEO pay ratio

The remuneration of Norlys' Board of Directors and Executive Board for the financial year ended is published annually in a remuneration report at norlys.dk to ensure transparency. The total remuneration package offered to each member of the Executive Board must at all times be market-compliant and transparent in relation to the national level. Norlys must be able to attract and retain

a competent Executive Board that can achieve the desired results and development for Norlys.

The CEO pay ratio decreased from 16.9 in 2023 to 11.2 in 2024, due to the median employee salary increasing in 2024 and no group bonus being paid to the CEO in 2024.

CEO pay ratio	ESRS ref.	Unit	2023	2024
Calculated on the basis of CEO remuneration and the median wage of a Norlys employee ¹	S1-16/97a	Ratio	16.9	11.2

¹ S1-16/97c: Norlys' CEO was the Group's highest-paid employee in 2024. Employees employed as at 31 December 2024 have been included
S1-16/97a CEO pay ratio is calculated as: Annual total compensation ratio of the highest paid individual/employee median of the annual total compensation ratio (excluding the highest paid individual)

The CEO pay ratio helps increase transparency about the pay gap between top management and other employees in the company. It

can aid investors, employees and the public in assessing whether the pay structure is fair and equitable.

Gender pay gap

The average gender pay gap for all employees at Norlys – from the lowest paid employee to the Executive Board – was 12.6% in 2024. The gap decreased from 2023 to 2024 as we have obtained a more balanced gender distribution in top management. However, the figure does reflect a predominance of men in top management positions across the Group.

Norlys produces annual salary statistics on comparable job titles broken down by gender. Statistics show that the pay gap is significantly less than 12.6% across comparable job titles.

Pay gap ¹ among genders	ESRS ref.	Unit	2023	2024
The difference in gross hourly wages between women and men ²	S1-16/97b	%	15.0	12.6

¹ The salary is calculated as taxable income, including benefits such as bonuses and pensions, and covers the entire annual income as well as hours worked.
² The percentage difference in relation to men's gross hourly wages
S1-16/97b The difference in gross hourly wages is calculated as: (Average gross wages for men - ((Average gross wages for men - Average gross wages for women)/Average gross salary for men) x 100

Discrimination incidents

S1-17

Our culture is based on mutual respect, equality and decency. We actively discourage any behaviour that may be perceived as abusive or degrading. We openly encourage dialogue, and we support any employee experiencing inappropriate treatment and ensure that such situations are dealt with in a timely and professional manner. In 2024, no complaints regarding discrimination incidents were

reported through the whistleblower system. If incidents occur that are not reported through the whistleblower system, we follow our management procedures, but such reports are not included in statistics.

Discrimination incidents and complaints	ESRS ref.	Unit	2023	2024
Metrics				
Discrimination incidents ¹	S1-17/103a	Number	0	0
Complaints ² reported via own workforce complaint channels for remaining social and human rights issues (excluding the items in a)	S1-17/103b	Number	0	0
Fines				
Fines ³ for incidents resulting from social and human rights violations.	S1-17/103c	Number	0	0
Fines ³ and compensation for incidents in relation to 103.c). In addition, reconciliation of these amounts with the most relevant amounts is presented in the financial statements.	S1-17/103c	Amount, DKK	0	0

¹ S1-17/103d Discrimination incidents: Abusive acts occur when one or more persons in the company grossly or repeatedly subjects one or more other persons in the company to bullying, sexual harassment or other degrading behaviour at work. The behaviour must be perceived as degrading by the victim(s). Whether the actions are an expression of recklessness or a genuine desire to offend is irrelevant. The victim's experience of the offending actions is central. Abusive acts is a collective term for bullying, sexual harassment and other ways in which harassment can occur at work. Abusive actions carried out by patients, users, customers, students or the like are considered acts of violence by the Danish Working Environment Authority.
² S1-17/103d: Complaints: Legitimate complaints received through the whistleblower system are included.
³ S1-17/103d: Fines: Limited to fines issued by the Danish Working Environment Authority booked in the accounts

S4 Consumers and end-users



IT and cybersecurity, data protection and safe use of our digital services

Norlys is Denmark's largest integrated energy and telecommunications group, and we have a special obligation to ensure the resilience of the critical infrastructures we manage. In an increasingly digitalised world, IT security is not just a technical challenge, it is a social responsibility. Digital infrastructure is vital for both citizens and businesses, and we see it as our responsibility to protect the data and systems that make the world go round.

However, in the new geopolitical reality, we are facing an ever-evolving threat landscape, and the risk of cyberattacks is at an all-time high. In 2024, we have invested heavily in digital infrastructure security, focusing on building and strengthening

digital resilience to withstand and quickly recover from digital attacks. Investing in digital infrastructure resilience will ensure that both consumers and businesses can safely navigate in a digital world.

We are also committed to protecting consumers' data and privacy, as security is not just a matter of compliance, but also of living up to our values of responsibility and transparency. We want to create the safest possible environment for our customers to safely navigate the internet and use our mobile services.

General information about consumer groups and product safety

SBM-3/10 | There is a constant threat and risk of third-party impact on our services across the business that can compromise IT systems as well as consumption and customer data. This may affect the supply of power and charging solutions to customers in all business units, including both private and business customers, industry, public institutions etc. who use our internet services, mobile telephony or network. At the same time, internet and mobile phone users are at risk of being exposed to illegal material that may be harmful.

Norlys is therefore particularly focused on these risks, working actively to protect IT systems, consumption and customer data as well as internet and mobile security.

Product safety

Norlys' products are not harmful to humans and/or do not increase the risk of chronic illnesses.

In relation to item SBM-3/10a, the risk of a potential negative impact is related to IT and data security.

Our customers and members do not rely on product or service-related information, such as manuals and product labels, to avoid

potentially harmful use of a product or service, but we instruct and guide our customers, so they can make the most of our products.

Protecting vulnerable groups

SBM-3/10a-iv | Norlys is committed to protecting all of our customers and members. We have implemented special security measures for children's use of internet and mobile services. For example, we do not accept customers under the age of 18, and parents or similar must give their consent for underage users to use a family (mobile) account.

High security level

The potential impact of incidents such as IT security breaches, technical errors, personal errors and the like, may be service breakdowns, lack of access to or leakage of customer data and the like. Major disruptions to the supply of power, internet, telephony and the like will cause extensive negative effects on citizens, businesses and society. Norlys therefore has contingency plans in place to handle such material incidents.

SBM-3/11 | Norlys provides critical infrastructure, which automatically places particularly high demands on protection, as customers, members, businesses, institutions and society are critically dependent on our supply services.

Policies regarding security and protection of consumers and end-users

S4-1

S4-1/13 | Norlys has a number of policies in place that must be complied with and which provide a framework for the protection of IT systems as well as consumption and customer data. The policies are briefly described below.

Security policies and security standards

A wide range of security policies and standards provide the framework for security in Norlys and Elnetselskabet N1. They enable us as a company to fulfil our obligations as part of the Danish critical infrastructure while complying with applicable legislation. Furthermore, Norlys works with management control of cyber and information security based on the ISO 27001 standard, which is an international standard for information security. We complement and support the ISO standard with the CIS Critical Security Controls, which is a framework for technical measures. The Group CISO is responsible for the Cyber & Information Security Policy, which is available to all Norlys employees and shared with relevant business partners.

Personal data processing policies and guidelines

In addition, we have a number of policies and guidelines that describe and provide the framework for our processing of personal data.

We process personal data confidentially and in accordance with applicable data protection legislation, and we continuously work to ensure clear guidelines on how and when personal data may be processed while continuously completing relevant training to ensure that we handle personal data in a correct, transparent and responsible manner.

Whistleblower policy

The policy aims to prevent potential reluctance to report material concerns, including concerns that may impact consumers and end-users. The policy is described in G1-1 on page 78.

Respect for human rights

S4-1/16 | In Norlys, we respect human rights in all our activities. This means that we always respect labour rights and comply with internationally agreed guidelines, including the Universal Declaration of Human Rights (1948), International Bill of Human Rights, the International Labour Organization's (ILO) Conventions and Recommendations on Human Rights and Decent Work (2), the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Global Compact Principles and EU guidelines on labour rights, including the European

Social Charter, the European Convention on Human Rights and the Charter of Fundamental Rights of the European Union. This commitment is included in Norlys' policy to promote a good work life (Politik for godt arbejdsliv). The policy is publicly available at norlys.dk

S4-1/16a | Norlys has joined the UN Global Compact and has described our commitment to respecting human rights in our policy to promote a good work life (Politik for godt arbejdsliv). We are in the process of developing a Code of Conduct to support this commitment.

Through our Supplier Code of Conduct, we commit our suppliers and business partners to respect human rights in their activities.

S4-1/16b | To ensure consumer/end-user involvement, we use Net Promoter Score (NPS) and customer satisfaction surveys, process surveys (how customers experience onboarding or customer service calls), customer panels, complaint channels and whistleblower systems.

S4-1/16c | Measures are described in S4-4 on page 74.

Dialogue with customers and partners

S4-2

Dialogue processes

S4-2/20a | Norlys engages with consumers/end-users at multiple levels. We provide critical infrastructure and operate in highly regulated industries. Therefore, we engage in close dialogue with industry organisations and authorities.

Direct dialogue with customers takes place via customer representative groups, customer satisfaction surveys and customer panels where representatives are selected based on topic and representation. Customers can contact Norlys store staff or customer service by email or phone at all times.

Frequency

S4-2/20b | The dialogue with authorities and industry organisations is ongoing. Customer satisfaction surveys are conducted every day and reported on a regular basis. Complaint channels and whistleblower system can be accessed at any time, and we have an ongoing dialogue with customers through our customer service centres.

Customer representative groups and customer panels are convened as needed throughout the year.

Responsibility

S4-2/20c | The Risk and Audit Committee oversees the whistleblower system in Norlys and N1, and is anchored in Amba Office. The work with authorities and industry organisations is anchored through the SVP of Corporate Affairs (Group) and the Director of Regulation and Security in Elnetselskabet N1.

Other engagement channels are anchored in Kundeselskabet Norlys through relevant directors.

Supervision

S4-2/20d | Regular reports on preparedness/resilience and cyber and information security are submitted to the Risk and Audit Committee, the Board of Directors and senior management in various subsidiaries.

Norlys handles as many complaints as possible in-house, making customers feel that they are treated fairly. Complaint statistics are shared internally in the organisation, and complaints which result in a need to amend information, processes etc. are followed up on. In addition to Norlys' internal complaint handling, telecommunications and internet customers have the option to complain to the Telecommunications Complaint Board or the Consumer Ombudsman.

Safety, remediation and channels for dialogue

S4-3

S4-3/25a | All IT or data security incidents are handled as soon as they are discovered, following the guidelines in our policies. After each information security incident, it is assessed whether there is a need to initiate a process that ensures relevant lessons learned and preventive measures, for example in the form of technical or management changes.

IT Shared Service Center continuously works to implement ITIL (operational process framework) to ensure an absolute minimum of IT downtime.

Norlys follows rules and applicable legislation for reporting data and information security incidents to authorities.

Dialogue channels

S4-3/25b | Norlys comes in contact with many consumers and end-users through the provision of infrastructure and services. Therefore, our complaint mechanisms are distributed across the different companies. For projects that concern end-users, our customer service team is handles communication about concerns, complaints or questions. Complaints are often reported through Norlys' website, after which an employee contacts the customer to answer questions or find a fair solution to the grievance. When using a third party, the end-user must contact the third party who can involve Norlys, if necessary. In addition, everyone can use our whistleblower system.

In our customer-facing business, we have a number of processes in place to ensure that we always understand our customers' needs and demands. Norlys uses customer insights to understand consumer and customer needs, and we use customer feedback to

improve our processes, products and services and to observe behaviour which is actively used in our product development. In addition, we continuously collect feedback from consumers and customers through customer surveys, satisfaction surveys and social media. With our customer panel, we continuously test products, services and customer attitudes through direct customer involvement. The customer panel gives Norlys access to quick and direct feedback from customers, which is actively used in the development of our digital solutions.

Requirements for business partners

S4-3/25c | Norlys commits suppliers and business partners through our Supplier Code of Conduct to comply with applicable legislation and live up to the general principles of the UN Global Compact, which are operationalised with the UN Guiding Principles on Business and Human Rights with reference to the International Bill of Human Rights (IBHR), the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILOD), the Rio Declaration on Environment and Development, the United Nations Convention against Corruption and other relevant international principles. These guidelines include access to complaint channels as an essential element of the due diligence required.

Control and training

S4-3/25d | To comply with item S4-2/20d, statistics are collected and regular reporting is made to the accountable management.

It is essential to strengthen our employees' skills and security awareness to minimise human risk factors. Employees act as a critical defence against external threats to our data systems and digital infrastructure.

Therefore, employees are trained in simulated phishing attacks, and all employees must complete a GDPR course specifically designed for this group within the first 30 days of employment.

Strain on customer access points

S4-3/26 | All communication to end-users includes contact information for the relevant departments for the service or product in question.

Due to our extensive IT integration work in 2024, several of our customer access points have been strained and we have not been able to live up to our own ambition of being available to our customers. We were aware that customers would inevitably notice changes as we moved from multiple systems to a single system. This has been especially true in a year, when a number of customers unfortunately were affected by unintentional faults and had to wait in long phone queues to have them fixed.

In 2024, we pulled out all the stops to complete the system restructuring, including a number of initiatives and upgrading our customer centres to ensure a much better communication process for our many customers going forward.

As described about our whistleblower policy in section G1-1, we have policies in place to protect individuals using whistleblower systems or processes from retaliation.



Our work to ensure IT and cyber security, data protection and safe use of our digital services

S4-4

Management control system

S4-4/30 | Each company has its own cyber and information security management system in place to help ensure that appropriate measures are taken to protect society, Norlys, our employees, customers and shareholders. The Group CISO ensures governance and is responsible for managing cyber and information security to ensure proper risk management throughout the organisation. The companies' IT and security departments prepare company-specific guidelines, implement policies and guidelines and support plans for risk and contingency work.

The Norlys Security Operations Center supports these efforts by ensuring proactive protection and ongoing confidentiality, integrity and availability of Norlys' digital assets and operational capabilities.

In addition, significant funds are allocated to this area in the Group's budgets.

Measures

S4-4/31a | We apply a wide range of security measures to increase IT and data security for our customers, members, employees and other users. Below is a list of some of our key measures:

- Risk assessments of critical functions, assets and suppliers are conducted continuously to ensure that social and business risks are at an acceptable level or brought to an acceptable level.
- Risk screening of new systems and service providers is performed.
- Relevant employee groups receive continuous competence development through various learning channels, including articles, videos, digital courses and internal awareness campaigns.

Stable supply

- Norlys Fibernet and the grid company provide critical infrastructure. Therefore, the companies are subject to the NIS regulation and currently implementing the NIS2 Directive. This is done under the supervision of the Danish Energy Agency.
- Risk and vulnerability analyses of the fibre network and the grid are prepared and turned into action plans to mitigate risks.
- Contingency plans are reviewed annually to ensure they are up to date and usable.
- An annual plan for emergency response drills to be carried out during the year is prepared.

Stay safe online and on the mobile

- Norlys protects consumers by blocking illegal online content, including child pornography and extremist material. With respect to child pornography, there is a voluntary industry agreement where Save the Children and the police make lists of illegal sites available to internet service providers (ISPs), who then apply DNS blocking to these sites.
- With respect to terror-related content, PET obtains blocking orders and provides ISPs with information about which sites to block.
- Blocking illegal gambling websites, IP rights violations (pirated copies of movies, music etc.) and dangerous products is done in collaboration with other ISPs, where the ISPs take turns going to court to process subpoenas from the Danish Gambling Authority, the Danish Rights Alliance and the Danish Safety Technology Authority to get the court's assessment of whether the sites are illegal and must be closed down. Once an ISP has received a

verdict, it is shared via the Telecommunications Industry Association in Denmark among its members, and the DNS blocks are implemented by all members. The collaboration enables the same high level of protection against illegal content across the Danish providers.

- Norlys is also blocking websites based on EU sanctions in relation to the war in Ukraine.
- Within mobile services, SMS firewall and spoofing protection work is ongoing in collaboration with the industry.
- In 2024, we have integrated security solutions into our new business internet packages, giving small and medium-sized businesses in particular access to security measures that protect them against everything from malware to malicious bots.

Remediation

S4-4/31b | Personal data breaches must be reported to the Danish Data Protection Agency and/or the Danish Agency for Digital Government, and we will notify the affected parties in accordance with legal requirements. Norlys will carry out a risk assessment of the breach and communicate with and inform the data subject to the extent necessary.

In case of a cyber security incident, Norlys Security Operations Center typically activates an escalation chain involving a crisis coordinator (if needed) and otherwise the relevant employees/managers in the affected company/ies.

Child protection

S4-4/31c | It is important that we talk to our children and young people about how to stay safe online and help them

develop healthy digital habits. That is why Norlys also supports initiatives that help children and young people achieve better digital behaviour and understanding. In 2024, Norlys and Telia Mobil Danmark, together with Telenor, YouSee, Fibia and the Telecommunications Industry Association in Denmark, supported yet another special issue of the Danish version of the weekly Donald Duck comic. This time the focus is on social media, online gaming, artificial intelligence and digital habits, which are naturally becoming more and more important to children and young people today. The magazine is produced in close collaboration with Center for Digital Pædagogik and Story House Egmont.

Management responsibility

S4-4/31d | As part of the management control of information security, Norlys' management must consider whether projects and initiatives and the effectiveness of the chosen measures are producing the expected results, and whether there are sufficient resources and competences to deliver on the agreed goals in terms of security and stability.

Governance

S4-4/32a | In accordance with Norlys' policies and guidelines and other legislation, all IT and cyber security incidents and data breaches are recorded, and the incidents are analysed and necessary action plans prepared. All employees are obliged to record incidents, and reporting channels are highlighted on our internal websites to increase employee awareness.

S4-4/32b | We follow recommendations from the Consumer Ombudsman and updates in legislation to ensure that our marketing is appropriate.

S4-4/32c | Our governance in relation to IT and cyber security ensures the availability and efficiency of processes, see previous description of Norlys' approach to management control of information security based on the ISO 27001 standard and our work with CIS (Critical Security Controls) and reporting channels.

Due diligence

S4-4/33 | Norlys must comply with applicable legislation, including rules on consumer safety and data protection. Therefore, we implement the processes necessary to ensure that we do not negatively impact consumers and end-users. Process compliance and process suitability of new initiatives or changes are continuously monitored.

Complaints to complaints bodies (internal, the Telecommunications Complaint Board, the Consumer Ombudsman, the Danish Data Protection Agency in relation to data protection etc.) as well as the Consumer Ombudsman's statements and the Danish Data Protection Agency's decisions and any fines to providers continuously show whether our many activities comply with the rules.

In cases where we or other actors with comparable practices receive warnings, criticism, orders or lose appeals, we make sure to change our practices according to the instructions.

Security and protection goals

S4-5

S4-4/38a | Availability and uptime, security incidents and results of training of all employees are reported to management on a regular basis.

Governance



Corporate governance with a focus on long-term value

In Norlys, corporate governance is more than just structures and processes, it is a fundamental driver of our contribution to the green transition and the digital development of society. Being Denmark's largest cooperative energy and telecommunications group, our management structure rests on a strong democratic foundation. Our special ownership system not only ensures that value creation remains in Denmark, it also enables long-term decisions and investments that push for green development rather than short-term gains.

In 2024, our democratic ownership structure has been a key factor in enabling strategic investments in renewable energy, electrification and digital infrastructures. At the same time, we and our grid company have strengthened our focus on security through massive investments in the protection of our critical infrastructure. As a co-investor in Den Sociale Kapitalfond Invest II, we contribute to reconciling business and societal value.

Our Board of Directors has completed an ESG Masterclass to ensure a solid decision-making basis for the Group's sustainability work. In parallel, we have maintained a close dialogue with our more than 660 members of the Board of Representatives through 22 well-attended dialogue meetings that support our vibrant cooperative democracy.

The following sections detail our work with responsible corporate governance.



Highlights 2024



Long-term investments to benefit members and society

Norlys' democratic ownership system ensures that the values created stay in Denmark. Investments benefit both rural and urban areas, and the ownership system enables long-term decisions that benefit society.

Norlys Vækstpulje (Norlys' growth pool) supports the green transition and communities

Distributed on three application rounds, Norlys Vækstpulje once again in 2024 awarded DKK 50 million to projects and initiatives that make a difference to communities and to the green and digital transition. In 2024, funding was granted to a total of 842 projects.



Progress in GRESB ESG rating

In 2024, Norlys achieved a GRESB ESG rating of 86 for the fibre infrastructure, a significant improvement from 59 in 2023. This progress is due to better reporting, energy-saving initiatives and responsible supplier policies, among other things.



ESG data managers in all Norlys companies

In 2024, Norlys appointed ESG data managers in all companies. They will help ensure a proactive approach to environmental, social and governance-related risks in their respective companies.



A vibrant cooperative democracy

The vibrant cooperative democracy is an important part of Norlys. Therefore, we arrange dialogue meetings with our Board of Representatives twice a year, where they can ask questions about Norlys, our priorities and key projects. Our Board of Representatives consists of more than 660 members, and in 2024, we had 22 dialogue meetings with a total attendance rate of 84%. Further to that, we have held two Board of Representatives meetings.



The Board of Directors completed ESG Masterclass

Norlys a.m.b.a.'s Board of Directors is responsible for setting the strategic direction for the ESG area and must therefore be updated on the latest trends and requirements. To strengthen their decision-making basis, all board members participated in a masterclass on ESG and sustainability in 2024.

G1-1 Business conduct and corporate culture



Norlys' mission statement



Norlys is a cooperative with more than 805,000 owners, where the democratic foundation is based on cooperative ownership. Our mission statement guides how we run our business, and we want to be a company that makes our owners proud. We aim to set high standards for democratically managed companies and ensure that we always comply with all relevant corporate governance regulations and recommendations.

Our mission statement also provides the framework for our corporate culture, where the core values of community, responsibility and innovation guide our decisions and actions. When faced with a dilemma, our employees and managers are expected to engage in dialogue and choose the solution that best reflects Norlys' values and mission statement. We must be responsible innovators who take responsibility for more than ourselves.



Recommendations on corporate governance

Norlys follows 23 of 25 recommendations
Read more on page 9.

Policies related to business conduct and corporate culture

G1-1/7 | Norlys actively works with several policies that support good business conduct, a healthy corporate culture and whistleblower protection. These policies serve as guidelines for both managers and employees and ensure that our values and principles are integrated into everyday life.

Our tax policy sets out a clear framework for Norlys' approach to taxation and covers all tax areas such as corporate tax, VAT and excise duties. The policy is designed to ensure that we follow best practice and respect recommendations from the Committee on Corporate Governance, the OECD Model Tax Convention and EU anti-tax avoidance legislation. The tax policy applies to all entities controlled by

Norlys, and we expect the same responsible behaviour from our associates and direct investments.

The investment policy sets out guidelines for Norlys' investments to ensure that our capital is managed responsibly. The investment policy contains our policy for sustainable investments, which is based on recognised international conventions and standards on policies for good business conduct and corporate culture, human rights, anti-corruption and the environment. The policy is based on the 10 principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN-based Principles for Responsible Investment (PRI) and the EU Taxonomy Regulation on Sustainable Finance. Norlys' principles and exclusions are also based

on the guidelines of prominent Danish pension funds.

The purpose of the financial policy is to provide overall guidelines for financial risk management at Norlys, focusing on liquidity, interest rate and foreign exchange risks. The financial policy applies to the Norlys Group and associated subsidiaries. Ongoing management is anchored under Norlys' CFO, who has delegated day-to-day financial management to Norlys' Treasury & Risk department based on the framework specified in the financial policy. The remuneration policy sets the framework for the remuneration of the Board of Directors, the Executive Board and managers in the Norlys Group.



With our policy for responsible political influence and lobbying activities, we ensure that Norlys acts transparently and responsibly in the public debate, political decision-making processes and legislative work. This policy sets guidelines for our political influence and lobbying activities, including clear principles on anti-bribery.

The insurance policy protects Norlys against financial loss in case of damage or claims and ensures that our equity and operations are not significantly affected.

To protect our customers and Denmark's critical infrastructure, we continuously work according to our policies for cyber and information security. They include cyber and information security and risk management, acceptable use of work equipment, access and user rights management, information security in supplier relationships, artificial intelligence, network security, encryption, personal information security, secure configuration and handling of hardware, security clearances, security logging and notification of authorities etc. Our goal

is to ensure the highest standards and compliance with current legislation through continuous evaluation and improvement.

Our data protection policies ensure that all customer and employee data is protected and processed in accordance with the General Data Protection Regulation.

Our emergency response and crisis management policy sets out how we handle crises quickly, structured and efficiently to restore normal operations without unnecessary disruption.

The whistleblower policy aims to ensure transparency regarding the whistleblower system and to avoid potential reluctance to report material concerns. In the policy, we commit to protecting whistleblowers and describe whistleblowers' rights.

The Supplier Code of Conduct establishes guidelines for Norlys' suppliers with a focus on human rights, labour rights, environment and anti-corruption. Suppliers must establish systems to address these areas and aspire to fulfil the policy, which

creates clear goals and expectations for collaboration.

How we create and develop a healthy corporate culture

G1-1/9 | At Norlys, we work purposefully to ensure a healthy corporate culture and good business conduct through several procedures and initiatives.

We follow *Anbefalinger for god selskabsledelse i forbrugerejede forsyningselskaber* (recommendations for corporate governance in consumer-owned utilities) developed by *Ejerforbrugerforum* (owner-consumer forum) under Green Power Denmark (industry association for the energy sector). These recommendations build on established codes, such as *Anbefaling for god selskabsledelse (for børsnoterede selskaber)* (recommendations for corporate governance (for listed companies)); *Kodeks for god selskabsledelse i kommunale forsyningselskaber* (code of corporate governance for municipal utilities); and *Anbefalinger for god fondsledelse* (recommendations for fund governance).

Our annual reporting is included in the energy sector industry report, and it is available on our website. It is the responsibility of the Executive Board and company management to ensure that the recommendations are implemented and complied with throughout the organisation.

Great leadership builds a healthy culture

In Norlys, we see leadership as the foundation of a healthy culture. We believe that culture stems from the way we lead, and that our leaders should be role models for good behaviour and ambitious goals. Leadership is about performing at a high level, but in a way that is ethical and responsible. Our three leadership principles drive our management philosophy and ensure that we always aspire to combine results with healthy values. Leadership development and cultural training takes place through management meetings, leadership conventions and ongoing dialogue, where values and leadership principles are put into play. See S1 on page 62 for more details on our governance principles.

CASE

Norlys supports social responsibility through Den Sociale Kapitalfond

As a cooperative, Norlys is committed to taking social responsibility through green, digital and social investments. In 2024, we became a co-investor in Den Sociale Kapitalfond Invest II, which invests its record capital of DKK 670 million in companies that create meaningful jobs for people in vulnerable positions.

The foundation is proof that social responsibility and financial return can go hand in hand. By combining risk-adjusted returns with targeted social impact, the investments create both business and social value. This strengthens Norlys' ambition to support communities through responsible investment.



CASE

The journey towards a greener value chain in Norlys

In 2024, Norlys intensified its efforts to reduce the climate footprint of its value chain, which is primarily made up of scope 3 emissions. The ESG team in Norlys' customer company developed a strategic roadmap with 14 initiatives focusing on data collection, risk management and supplier partnerships.

Two key projects were initiated: One is GreenGuard, which is designed to promote sustainable procurement and reduce carbon pollution. The second is the implementation of EcoVadis, which enhances risk management and collaboration with suppliers through screening of their ESG performance.

In 2025, Norlys will develop these initiatives further and integrate an ESG sourcing guide in the procurement process to ensure that a more sustainable approach remains a natural part of the Group's strategic decisions.



People Review

Another key element in developing our corporate culture is the People Review. This process creates a shared language around values, behaviour and results in Norlys. Once a year, all managers and employees are assessed on their ability to live our values and deliver results. This assessment forms the basis for conversations between employee and manager, ensuring that our focus on progress, development and motivation is supported by putting our values into action daily. People Review is further described in S1-2 on page 56.

Dialogue meetings and strategic anchoring

Our mission statement and strong set of values are continuously communicated to employees through dialogue meetings with the Executive Board of each company. All strategies in Norlys also refer directly to the mission statement to ensure that our values are integrated in our strategic work.

Cyber security and training

Being a critical infrastructure provider, Norlys emphasises resilience and cyber security. We continuously train employees in identifying and reporting security threats, while specialists receive targeted security training, e.g. for software developers. We have established a crisis management organisation, implemented specialised crisis communication equipment and conduct regular training exercises.

Joining sustainability initiatives

Norlys has joined several global initiatives such as Science Based Targets, UN Global Compact, GRESB and EcoVadis with the aim of committing to sustainable development and ensuring transparency in our ESG efforts.

Mechanisms for identifying, reporting and investigating concerns about illegal conduct

G1-1/10a | To maintain responsible corporate governance and a strong company culture, it is essential that we have clear processes to handle situations that compromise our values. Norlys has a whistleblower system that allows for both anonymous and non-anonymous reporting of concerns. These can be actions or decisions that involve criminal acts, financial loss or damage to the company's reputation.

All reports are treated confidentially and, if desired, anonymously. When a report is received, it is handled objectively and immediately by a whistleblower committee consisting of trusted employees appointed by the Board of Directors. Whistleblower committee members are bound by confidentiality, and the process around each report is customised, including data collection and remediation of any negative impacts. Norlys is committed to providing feedback on reports within three months and communicate any planned actions. Norlys' whistleblower policy contains a detailed description of how the received reports are dealt with and processed.

Norlys' whistleblower system includes several organisational units. Greenlab Skive and Mjølner Informatics use systems managed by independent law firms, while Norlys, Norlys Energy Trading and Automize share the same whistleblower system. Elnetselskabet N1 has a separate reporting channel.

The whistleblower system is not only reserved for Norlys employees, but is also open to shareholders, executive and board members, self-employed persons, suppliers

and subcontractors, former employees, interns, customers and citizens. This allows all relevant stakeholders to report violations that concern the Norlys Group.

Protection of whistleblowers

G1-1/10c-i | To raise awareness of the whistleblower systems, the information is available on our intranet and publicly on norlys.dk and on Elnetselskabet N1's website.

G1-1/10c-ii | Norlys complies with the protection conditions of the Danish Whistleblower Act, which are described in detail in our publicly available whistleblower policy on Norlys.dk. It clearly states who is covered by the protection, including employees, members, employees of suppliers and subcontractors, and former employees.

Everyone who meets the protection conditions are protected against retaliation, including threatened or attempted retaliation because of having made a report. Retaliation means any direct or indirect act or omission in a work-related context resulting from internal or external reporting or public disclosure that may cause unjustified harm to the whistleblower.

Once a case is closed, all personal data is deleted within six months in accordance with the provisions of GDPR.

G1-1/10e | In accordance with the Danish Whistleblower Act, an external whistleblower system has been established at the Danish Data Protection Agency. This system allows the entire protected group of people under the Danish Whistleblower Act, not just employees, to file reports. Reports may concern the same matters as in Norlys'

internal whistleblower system, including violations of EU law, serious offences or other material conditions.

For information on other complaint channels, see pages 64 and 72.

Business conduct training

G1-1/10g | Norlys does not have a dedicated policy for business conduct training, but a written Code of Conduct is under development and expected to be released in 2025. We use our strong leadership culture, including management meetings, whiteboard meetings, NOA (national occupational health surveillance), APV (health and safety risk assessment) and People Review to ensure continuous focus on awareness, assessment and follow-up on behaviour in the organisation.

Corruption and bribery

G1-1/10h | Norlys operates primarily in Denmark, which Transparency International ranked as the least corrupt country in the world in 2024. The risk of corruption and bribery is therefore generally considered low. However, as a critical infrastructure provider, we conduct security screenings of key personnel in critical functions within cyber and information security and power supply.

G1-5 Political influence and lobbying



G1-5/27 | As the country’s largest energy and telecommunications group, we have a special responsibility to contribute to a sustainable social development and ensure that modern infrastructure is accessible to everyone. That is why we actively engage in public debate, political decision-making processes and legislative work that affects Norlys, our industry and our customers and members. To maintain functional separation, the political influence and lobbying activities for Elnetselskabet N1 is separated from the other business areas in the Norlys Group.

We believe that a strong democracy involves all relevant stakeholders in decision-making processes. By actively participating in the public debate and working for positive change, we can help create a better society for everyone.

Our approach is rooted in the values of openness and responsibility. Being a trusted partner, we value a close and constructive dialogue with politicians, NGOs and citizens. Such dialogue is essential to ensure social development that rests on a solid and broad foundation.

Organisational setup of political influence and lobbying activities

G1-5/29a | In Norlys, our political influence and lobbying activities are centralised in the Public Affairs & Sustainability department under the Director of Corporate Affairs. Political influence and lobbying activities in Elnetselskabet N1 is centralised in the Regulation department.

Norlys’ and N1’s political influence and lobbying activities are primarily handled by in-house staff. Our views are also represented by the trade associations of which Norlys is a member, including the Danish Chamber of Commerce, Green Power Denmark, DSO Entity, the Telecommunications Industry Association in Denmark, Fiberalliancen, Danske Mediedistributører, Mobility Denmark and

Dansk e-Mobilitet.

Donations and expenses for political influence and lobbying activities

G1-5/29b | Norlys does not make donations to causes or organisations that may result in the company gaining unfair advantages. We never offer financial benefits or services to decision-makers, or individuals associated with them to influence a decision or outcome that affects our business. We pay special attention to the rules for receiving gifts and other benefits that apply to public officials and politicians, and we do not provide financial support or donations to political parties or candidates.

G1-5/29b-i | Norlys has a zero-tolerance policy towards bribery and corruption. We do not accept attempts to influence political, regulatory or business decisions affecting Norlys through unethical or illegal methods. This applies to all our stakeholders, business partners and suppliers.

Main themes and positions in Norlys’ political influence and lobbying activities

G1-5/29c | In the sections below, we describe the most important themes and positions of our political influence and lobbying activities. The topics are organised by ESG impacts that are considered material to Norlys and that we report on in 2024.

Climate change, renewable energy and energy consumption

More renewable energy

Norlys is committed to promoting the build-out of renewable energy. Through our ownership of Eurowind Energy, we contribute to the development and operation of wind and solar farms. We participate in the public debate and work for better conditions for the build-out of renewable energy, among other things through Alliancen Vedvarende Energi. An important theme in the debate

Category	ESRS ref.	Amount (DKK)
Donations to politicians	G1-5/29b-i	0
Contributions to lobby organisations	G1-5/29b-i	0
Contributions to interest groups/business organisations	G1-5/29b-i	21,409,295

has been how the green transition can also create growth and local jobs, and we have advocated that onshore development should prioritise hybrid parks of both solar panels and wind turbines. This would optimise land utilisation, ensure efficient use of the power grid and provide high production capacity. By increasing the share of renewable energy, we can reduce the climate impact for ourselves, our value chain and society at large.

Grid loss and Power Purchase Agreements

Norlys is working to enable grid operators to cover grid loss through transparent Power Purchase Agreements (PPAs) on market terms instead of settling solely at spot prices. This would reduce Norlys’ carbon footprint, create greater price stability for grid companies and consumers, and promote the build-out of renewable energy. This work is carried out in collaboration with industry organisations and through policy dialogue.

Increased consumer protection for electricity customers

In Norlys, we believe that consumers should come first. Media coverage about the ‘black sheep’ of the electricity industry have brought renewed focus on the need to put increased consumer protection on the political agenda. In Norlys, we are working on concrete initiatives to strengthen consumer protection. We do this in dialogue with political actors and through our interest groups, and we have participated in the public debate.

Electrification of passenger cars

Norlys wants to make it easier and more attractive to own an electric vehicle, no matter where in the country you live. Our work includes ensuring good framework conditions for the build-out of charging infrastructure and supporting a more transparent and well-functioning charging market. We also see great potential in promoting the utilisation of the flexibility potential of electric vehicles, which can contribute to a stable energy system and support the transition to renewable energy sources.

Electrification of HGV transport

Norlys focuses on advancing the electrification of heavy goods transport by putting political focus on the barriers

that hamper development. These include the high cost of electric lorries and depot charging infrastructure, as well as long lead times on grid connection. We work to ensure that public support for heavy transport is targeted towards initiatives that maximise electrification and green transition across the country.

Employee conditions

In 2023, Norlys introduced free child sick days, a scheme that has since attracted significant public attention. Throughout 2024, we have shared our experiences with the scheme through the media and contributed to the debate on work-life balance. By the end of 2024, we were also able to calculate the cost of the scheme, which equates to less than ten minutes of increased absence per month per employee. This result should be seen in light of the fact that the scheme has contributed significantly to positioning Norlys as an attractive workplace.

In addition to media coverage, the scheme has also attracted political interest. Norlys has participated in both a conference and policy meetings to share experiences and perspectives on how similar initiatives could promote well-being and flexibility for employees.

Protecting customers and members, own business and critical infrastructure

Cyber security and protection of critical infrastructure

In a time of geopolitical tensions and a complex threat landscape where the risk of cyberattacks, sabotage and extreme weather events is increasing, it is more important than ever to strengthen the preparedness and resilience of our critical infrastructure. Norlys is committed to a close and efficient cooperation across public authorities and private companies responsible for critical infrastructure. In addition, we emphasise proper national implementation of the EU NIS2 and CER directives. This means harmonised and streamlined supervision and framework conditions that enable the necessary investments in increased resilience.

Danish Emergency Preparedness Act

Elnetselskabet N1 is promoting the adoption of a new emergency preparedness act for the energy sector in 2025 which tightens the requirements for both physical and cyber security in the grid companies. In 2024, Elnetselskabet N1 focused on ensuring that the cost of meeting the requirements of the upcoming law does not have a negative financial impact on the grid companies. This effort has resulted in a change to the revenue frameworks. The change means that the costs of emergency preparedness under the upcoming law on strengthened emergency preparedness in the energy sector will be financed separately. Furthermore, these costs are kept outside of the grid companies’ financial benchmark.

Broadband

A fast and stable broadband connection has become a prerequisite in a digitalised society such as Denmark. Everything from working from home, schooling, contact with public authorities and entertainment is now dependent on a well-functioning digital infrastructure. Norlys therefore engages in dialogue with politicians, authorities and other relevant stakeholders to ensure that the framework conditions support the roll-out and upgrade of the necessary high-speed infrastructure and fair competition.

EU Transparency Register

G1-5/29d | Norlys is registered in the EU Transparency Register: Identification number 362886551863-95

Members of management who held comparable positions in public administration

G1-5/30 | No members of the Executive Board have held a position in public administration, including supervisory bodies, in the two years preceding their appointment to the Executive Board.

Currently, one of the members of the Board of Directors elected by the Board of Representatives is a member of the Danish Parliament and one member sits on a municipal council.



CASE

Norlys Vækstpulje supports projects that make a difference for community and green social development

Norlys Vækstpulje is set up to support projects within the area where Norlys’ owners live, which covers large parts of Jutland. Promoters may also apply for funding if, for example, the project benefits the green transition in a broader sense.

Norlys Vækstpulje supports projects that in one way or another promote green innovation or local engagement. Like Norlys, many Danes take responsibility for more than themselves every single day, and we want to help them succeed through Norlys Vækstpulje. With three application rounds, in 2024 Norlys Vækstpulje once again awarded DKK 50 million to a total of 842 projects and initiatives that make a social difference and support the green and digital social transition.

Appendix

Appendix: Climate accounting manual

E1-1/AR 39.b

General information

This appendix aims to provide insight into the methodologies, assumptions, considerations, emission factors and calculation tools used in Norlys' scope 1, 2 and 3 calculations.

The calculations follow the guidelines of the GHG Protocol, cover the entire Norlys Group and are based on the consolidation approach 'operational control'. Norlys will recalculate greenhouse gas emissions if there are changes that exceed 5% of the relevant baseline year.

Methods

The majority of Norlys' emissions are related to sold energy (electricity and gas), which is calculated based on activity data in terms of the amount of energy sold. The non-energy related scope 3 calculations are mostly spend-based.

Norlys' suppliers were matched with an emission factor based on industry code. In some cases, we have deviated from the supplier's industry code if that would better represent the product/service Norlys purchases. The spend-based calculations are divided into scopes and categories based on the financial account to which they are booked. Several accounts have been excluded as they do not contain carbon-relevant records. Expenses from suppliers which we have not been able to match with an emission factor have been included by extrapolating from the average intensity on the financial account where the expense is registered. To avoid double counting emissions, internal trading within the Norlys Group has been removed.

Company structure

Only spend-based calculations have been used for Norlys' minor subsidiaries. Telia Mobil Danmark, which recently

became part of Norlys, has made its own calculations, which have subsequently been incorporated in Norlys' total emissions.

The following clarifications thus apply to Kundeselskabet Norlys, excluding Telia Mobil Danmark, Norlys Fibernet, Elnetselskabet N1 and the Norlys Group.

Emission factors and calculation tools

For scope 2 and 3, kWh consumption in buildings is divided into DK1 and DK2, respectively, and an average in relation to car-related and other consumption. Data on other electricity consumption related to scope 1 and 2 are primarily collected via the data hub at eloverblik.dk. For scope 1 and 2, CEMASYS was used, including emission factors from CEMASYS. Scope 3 was calculated in Excel. The spend-based calculations of scope 3 are based on emission factors from DEFRA. In order to apply the emission factors to Norlys' costs, these are adjusted for currency, VAT and inflation.

Scope 1 + 2

Car/fuel data from the Norlys Group are calculated in litres and kWh, respectively, and collected as direct fuel consumption. For Telia Mobil Danmark and Mjølner, consumption data is converted from kilometres to litres and kWh.

Building consumption of electricity and heating is obtained individually from the building owner/provider. Data are primarily based on 2024 consumption statements on electricity and heating, but for some buildings where consumption data have not been available, estimates have been made based on 2023 consumption or on the number of heated square metres.

With respect to SF6 gas, the basis of comparison is not

1:1. The increase is mainly due to improved data quality in 2024. It has not been possible to refine 2023 data.

Scope 3.1 Purchased goods and services

Emissions from purchased goods and services are primarily calculated using the spend-based method. Spend data have been replaced with better-quality data (e.g. own carbon accounts, product-specific data etc.) if the supplier was able to provide this. Emissions from the manufacturing of sold equipment are calculated using PCFs and EPDs obtained from our suppliers and manufacturers. In cases where emissions data have not been available, extrapolation has been made from similar products where it is deemed more representative than the spend-based method.

Scope 3.2 Capital goods

Emissions from capital goods are primarily calculated using the spend-based method. Emissions associated with Norlys' new building in Aalborg are based on EPD data for the building from the supplier. The placement of emissions in category 1 and category 2 is based on financial accounts. The calculations are based on the year's inflow, and the full emissions are included without depreciation, discounting or amortisation.

Scope 3.3 Fuel- and energy-related activities

Emissions from fuel- and energy-related activities not included in scope 1 and scope 2 consist of Well-to-Tank (WtT) emissions from Norlys' scope 1 and scope 2 energy consumption, transmission and distribution losses from scope 2 energy consumption, and emissions from electricity bought and sold to end-users. The latter makes up ~96% of category 3.3.

To calculate the WtT emissions from fuels in scope 1, the activity-based method with emission factors from DEFRA

was used. The WtT calculations for purchased electricity and district heating are based on the methodology described by DEFRA and emission data from the same sources as those used in the scope 2 calculations.

Calculation of transmission and distribution losses (T&D losses) for purchased electricity and district heating is based on loss rates from Energinet's latest environmental declaration, divided by price zone (DK1 and DK2) and average loss rate on district heating from the Danish Energy Agency. The calculations include WtT emissions. Distribution losses from consumption on N1's grid are not included to avoid double counting.

Emissions from electricity purchased and sold to end-users are calculated based on the amount of electricity sold per price zone and emission factors from Energinet's latest environmental declaration. Calculations include WtT emissions and emissions associated with T&D losses. Internal sales are excluded from the calculations as these emissions are already accounted for in scope 2. Distribution losses for electricity sold and used on N1's grid are not included.

Scope 3.4 Upstream transportation and distribution

Emissions associated with upstream transport and distribution are mainly calculated based on spend, but also based on supplier-specific data, where available. In cases where the cost of transport is included in the total price of a purchased item, the emissions will be counted in categories 1 and 2, as it has not been possible to calculate transport separately.

Scope 3.5 Waste

Emissions from waste are calculated using the activity-based method. Waste volumes are coupled with emission factors from DEFRA based on treatment type and waste fraction. For suppliers where no activity data have been

received, emissions are estimated based on spend.

Scope 3.6 Business travel

In addition to spend, the activity-based method was used to calculate business travel emissions. Here, emissions for kilometres travelled are covered by mileage allowance, where total distance by fuel is linked to emission factors from the Climate Compass. Calculations include WtT.

Scope 3.7 Employee commuting emissions

Emissions from employee commuting are estimated using the Climate Compass emission factor for average emissions from commuting, per employee. It has not been possible to adjust for employees with company cars, whose emissions are already counted in scope 1 and scope 2. These emissions are therefore potentially counted twice. However, due to the limited amount of emissions, this has no impact on the overall result. Calculations include WtT.

Scope 3.9 Downstream transportation and distribution

Emissions from downstream transport and distribution of Norlys' sold equipment are estimated based on the total weight of the equipment and assumptions on delivery distance and shipping method. As all equipment is delivered in Denmark, an average delivery distance of 300 km has been assumed. Lighter equipment is assumed to be delivered by vans, while heavier equipment is assumed to be delivered by lorry. Calculations use emission factors from DEFRA and include WtT.

Scope 3.11 Use of sold products

Emissions from the use of sold products include emissions associated with electricity consumption from sold equipment and emissions from sold gas. Sold gas accounts for ~97% of category-11 emissions.

Emissions from electricity consumption from sold equipment are calculated using the activity-based method considering the equipment’s average lifetime, electricity consumption and on time. Emission factors from Energinet’s latest Environmental Declaration are used in the calculations. Calculations include WtT emissions and emissions associated with T&D losses.

To avoid double counting, electricity already included under category 3 has been subtracted. Similarly, distribution losses for equipment using electricity on N1’s grid have not been included. Where more precise data were unavailable, estimations were based on Norlys Energi’s market share in Denmark and N1’s share of the total distribution loss in Denmark, respectively.

In accordance with the TELCO industry’s recommendations, Customer Premises Equipment (e.g. routers and ONTs) is counted in category 11 as sold products, rather than in category 13 as rented products. For methodological consistency, rented wall boxes are also included in category 11. Only standby consumption is included for wall boxes.

Emissions from sold gas are calculated based on the volume of gas sold and emission factors for pipeline gas from the Climate Compass. These emission factors are calculated based on the average mix of natural gas and biogas in the Danish pipeline network. Thus, a ‘location-based’ approach has been chosen, and no distinction is made between natural gas and biogas sold by Norlys.

Scope 3.12 End-of-life treatment of sold products

Emissions associated with the end-of-life treatment of sold equipment are calculated using the activity-based method. All equipment included in category 11 is included in the calculations based on the products’ weight. The

calculations use emission factors from DEFRA based on assumptions about treatment type and fraction group.

Scope 3.13 Downstream leased assets

Emissions from the operation of assets owned by Norlys and leased to other entities that are not already included in scope 1 or scope 2 are calculated using the activity-based method. The calculations only include the power consumption of the data centre leased to Telia Mobil Danmark, as other leased assets are included in category 11. This also adjusts for emissions from distribution losses and sold electricity, which are already included in scope 2 and category 3, respectively.

Scope 3.15 Investments

Emissions from investments include emissions from Norlys’ subsidiaries and associated companies that are not already included in scope 1 and scope 2 as well as Norlys’ financial investments. The emissions are weighted according to Norlys’ ownership share.

The calculations for affiliated and associated companies are based on the companies’ own latest published carbon emissions figures. For companies without published figures, emissions are estimated based on their latest turnover and spend-based emission factors from DEFRA. Some investments without available data have been excluded, but this is not considered to have a significant impact on the overall result.

Emissions from Norlys’ financial investments are based on calculations made by Norlys’ investment managers and cover equities and corporate bonds. It has not been possible to include emissions from mortgage and government bonds due to lack of available data.

¹Link to Eloverblik: [EIOverblik | Home](#)

²Link to CEMASYS: [Carbon Accounting - CEMAsys](#)

³Link to DEFRA: [Greenhouse gas reporting: conversion factors 2024 – GOV.UK](#)

⁴Link to Energinet’s environmental declaration: [Location-based declaration \(Environmental declaration\)](#)

⁵Link to emission factors from the Climate Compass: [Home | Climate Compass](#)

⁶Link to emission factors from the Climate Compass: [Home | Climate Compass](#)

⁷Link to emission factors from Energinet’s Environmental Declaration: [Location-based declaration \(Environmental declaration\)](#)

⁸Link to Telco Industry Recommendations, GSMA (Page 63): [Scope-3-Guidance-2023.pdf](#)



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