



# Sustainability report 2021



## Responsible business

Statnett is the transmission system operator (TSO) for the Norwegian power system, and operates and develops the nationwide electricity transmission grid. Through our social mission, we help set the premise for the green transition, facilitating a sustainable society.

Statnett has a key role to play in achieving zero emissions in 2050 and will pave the way for electrification and new green value creation. Sustainability and safety must be the basis for everything we do. This includes, among other things, broad environmental responsibility, preserving biodiversity, safeguarding personal safety, diversity in the workplace and decent working conditions throughout the value chain. It also includes what we can do to minimise our resource use and environmental impact, and how we can reduce our own greenhouse gas emissions.

We use results from ESG metrics (Environmental, Social, Governance) as an indicator of our sustainability work and aim to be among the very best in our sector on relevant ESG metrics.

### Global challenges and sustainable solutions

Business enterprises are affected by globalisation, technological advances, climate change, loss of biodiversity and a shortage of natural resources. There is a growing expectation that value must be created in a sustainable way. This means that companies' products and services, and the way they are made and used, must be compatible with the UN Sustainable Development Goals (SDGs). For Statnett, this means facilitating electrification and making sustainable choices in our day-to-day working lives. Climate change is one of the biggest challenges of our time. Electrification is an important factor in reaching global and national climate goals. A robust power grid and good security of supply are prerequisites for the zero-emission energy system of the future. Our activities enable Norway and our neighbouring countries to increase the proportion of renewable energy and reduce greenhouse gas emissions. Although Norway is one of the world's most highly electrified countries, around half of the energy our society uses comes from fossil sources. The potential for further electrification is particularly large in the areas of transport and industrial production. More and more people want to connect new businesses to the grid or

increase existing consumption. Statnett is therefore planning for a significant growth in consumption – up to 220 TWh in 2050, compared to 140 TWh in 2021.

Statnett maintains a high level of activity, has a great many work processes with a high level of inherent risk, relatively space-intensive facilities, in addition to working with international contract partners. Loss of biodiversity, personal safety, social dumping and unethical business practices are therefore all relevant challenges for us. In our strategy, we take the position that targeted and systematic efforts in the field of sustainability are a key part of our business operations.

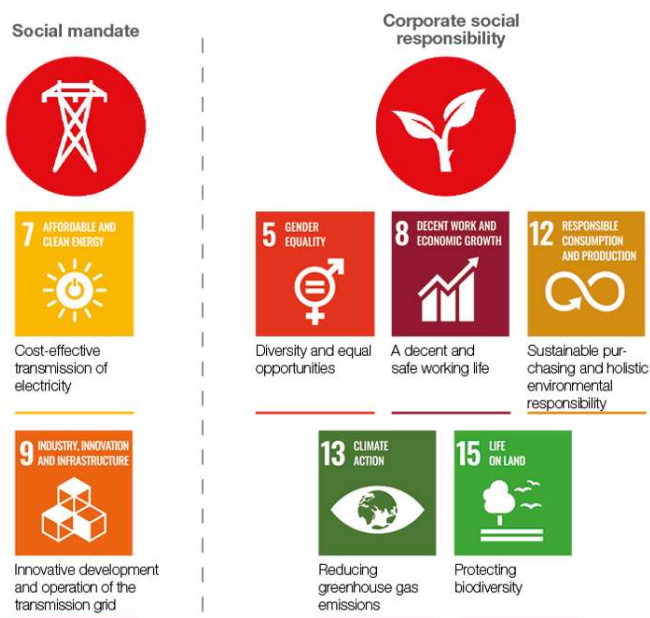
### Statnett's contribution to the UN Sustainable Development Goals

Statnett supports the UN Sustainable Development Goals (SDGs) that were adopted by world leaders in September 2015. The 17 goals are designed to contribute to a more sustainable planet and a good life for future generations. In order to achieve these goals, both public authorities and business must take responsibility.

The SDGs provide a framework for our efforts. We have formalised our commitment to achieving these goals by joining the UN's sustainable business initiative: the UN Global Compact (UNGC). UNGC member companies undertake to prepare an annual report called a "Communication on Progress" (CoP). [Statnett's most recent CoP](#) is available on the UNGC website. This sustainability report (part of our 2021 annual report) has been prepared in accordance with the requirements for the UNGC's CoP, and will thus constitute Statnett's next CoP.

Sustainability is an integral part of our business, when deciding on solutions, land use, power line routes, technical solutions and materials. Conflicts may arise where the same activity that contributes positively to the achievement of one SDG has a negative impact on others. The goal is to ensure the best possible comprehensive and sustainable solutions.

Seven of the UN's Sustainable Development Goals are particularly relevant to us. We contribute to these through our **social mission** and the way we address our **social responsibility**. The seven goals are presented on the next page.



## Prioritising sustainability areas

Statnett laid out a new Group strategy in 2021. Sustainability is an important part of our strategic agenda and is defined as one of Statnett's six main goals in the Group's scorecard: ***Sustainability and safety in everything we do.***

The following areas are prioritised:

- Ensuring all employees enjoy a safe working environment
- Ensuring decent employment and working conditions throughout the supply chain
- Taking broad responsibility for the environment and preserving biodiversity
- Reducing greenhouse gas emissions and managing climate risk
- Increasing workforce diversity with respect to competence, background and gender
- Combatting corruption, human rights abuses and unethical behaviour in everything we do

These areas and associated ambitions have been considered by Group Management and the Board of Directors in 2021.

## Organisation and implementation of sustainability

**Goal: Be among the very best in our sector in terms of external ESG metrics**

Statnett's social responsibility policy answers the expectations state-owned enterprises are subject to in the areas of human rights, labour rights, climate and the environment, as well as anti-corruption. This policy is part of our management system, and is also based on the principles of the UN Global Compact and national statutory requirements, facilitating a structured and holistic approach across the organisation.

Statnett is certified according to the international standards ISO 14001 for environmental management and ISO 55001 for asset management.

The Board of Directors has the overarching responsibility for ensuring that Statnett lives up to expectations regarding good sustainability work. Group Management is responsible for following up the company's goals, implementing necessary measures and ensuring the achievement of results. Day-to-day implementation of this work is a management responsibility. Management of sustainability work is an integral part of all activities in all management teams, business areas, departments and sections, including wholly owned subsidiaries. Our framework for risk management and internal control ensures that we meet requirements and expectations. This is described in the annual report's chapter on risk management and internal control.

Statnett's sustainability work has been strengthened following a major reorganisation in 2021. *People & Sustainability* has been established as a new corporate staff function with group-wide responsibility for sustainability. We have an interdisciplinary sustainability team, with representatives from relevant business areas. The team is coordinated by the new staff function.

Statnett's most important guidelines for sustainability work are statutory rules and requirements, as well as the internal obligations laid down in our governing documents:

- “The green change of pace” – Statnett’s strategy 2021
- Governance policy for corporate social responsibility
- Employee Code of Conduct
- Supplier Code of Conduct
- HSE policy (health, safety and environment)
- Pay and working conditions
- Environmental and climate strategy
- Functional policy for procurement
- Procurement instructions
- Personnel Handbook

Compliance with applicable laws and requirements is an essential part of our management, activities and decision-making processes. Within priority areas, we aim to go beyond these requirements. We will actively use the results of ESG metrics and risk assessments to improve our sustainability work, and our goal is to be among the very best in our sector in external ESG metrics. This means that we must increase awareness of sustainability by having an overview of future requirements. In addition, we must boost the organisation’s competence and develop the organisation’s culture, as well as integrate considerations of sustainability and safety in internal processes.

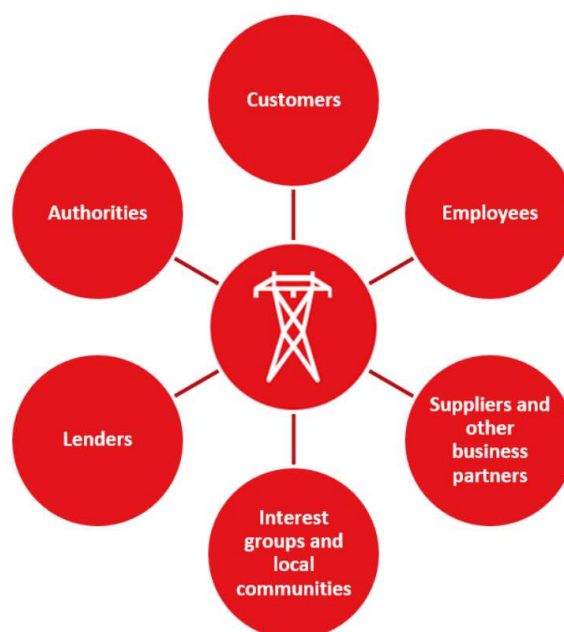
## Statnett’s Ethics Ombudsman

Statnett has an Ethics Representative, whose role is to strengthen legal protection for employees, and to help to uncover and deal with matters that are in breach of our ethical guidelines. The ethics representative scheme is described in our codes of conduct for employees and for suppliers. These codes of conduct, which have been approved by the Board of Directors, state that we have zero tolerance for corruption, harassment and workplace crime.

The Ethics Representative receives and processes enquiries from anyone who has observed wrongdoing or errors committed by Statnett. This can apply to our employees, our managers or our suppliers. The Ethics Representative is required to take steps to ensure that the person making contact is guaranteed total confidentiality and anonymity if requested. It is also possible to report to the Ethics Representative completely anonymously through our digital whistleblowing channel called “Mitt varsel”. The Ethics Representative reports to the President & CEO and the Board of Directors.

## Dialogue with stakeholders and customers

Statnett has a range of stakeholders in Norway and the rest of Europe. Our stakeholders extend from government authorities to local landowners and people living near our facilities. Grid operators, power producers, existing industry, new green industry, investors in offshore wind projects, the transport sector, private individuals and households are stakeholders with whom we have an ongoing dialogue. Internationally, Statnett works with suppliers, contractors, investors, lenders, government agencies, regulatory bodies in the Nordic region and the EU, and transmission system operators in countries with which we exchange power. The figure shows the most important groups of stakeholders with which Statnett engages.



Statnett supplies critical infrastructure and administers public resources. This is why transparency about how we carry out our work is important. Dialogue and collaboration with stakeholders and customers are central in the exercise of Statnett’s two roles as transmission system operator and grid owner. These are described in the “This is Statnett” chapter in our annual report and on our website. In recent years, there has been a great demand for new connections to the grid. These processes require intense dialogue with the actors requesting a connection and with affected parties, such as local power distribution companies, local authorities and landowners. Much of the dialogue is regulated through regulations on power system assessments and licensing processes.

In licensing processes, it is important to quickly engage in a dialogue with the stakeholders concerned, both to ensure acceptance for the measures being planned and to elicit suggestions for local adjustments. We therefore arrange meetings with local stakeholders beyond those required by statutory regulations, where we discuss concerns related to construction traffic, noise, electromagnetic radiation, landscape impacts and encroachments on nature, and we receive input on how we can best adapt solutions to reduce these types of effects. Local mitigating measures are also explored in more detail where the licence requires an environment, transport and construction plan (MTA plan). This plan is drawn up in dialogue with those affected and will in some cases also be sent out for consultation. The plan describes how environmental considerations are to be taken into account in the development project and planned measures to mitigate the impact on the local community.

On our website, we provide information about individual projects in the form of messages and news, for example, as well as by publishing various documents such as licence applications and reports.

We engage in an ongoing dialogue with organisations and entities within the industry, with government and regulatory authorities, numerous other stakeholders, customers and actors in civil society. In addition, we participate in different networks, initiatives and forums at the national and international level. Statnett's customers are represented in the Market and Operations Forum, where we discuss and share knowledge about strategic issues and matters of principle, and have meetings with Statnett's Board of Directors. The minutes from the forum's meetings are published on Statnett's website. We also participate actively in Nordic and European collaborations, for example the European Network of Transmission System Operators (ENTSO-E).

## About the report

The sustainability report is structured in three main parts:

- Our environmental and climate contributions
- Our contributions to sustainable economic growth
- Our social contributions

The chapters refer to which of the UN's Sustainable Development Goals we contribute to and how we

contribute. Accounts for the sustainability report can be found on page 49.

Our reporting is in accordance with the Global Reporting Initiative (GRI) Standards, Core level. This covers indicators for different themes and requirements for the reporting process. We also report on relevant indicators for the energy sector (GRI G4 Electric Utilities Sector Disclosures). The GRI table links the GRI indicators to the UN Sustainable Development Goals.

We have engaged Deloitte AS to review the report. Their statement is attached. Although this report forms part of Statnett's 2021 annual report, we have elected to publish it as a separate document. Some elements in the GRI table refer to other chapters in the annual report than that relating to sustainability.





## Our environmental and climate contributions

Climate change and loss of biodiversity are two major global challenges that we aim to counteract through our day-to-day activities. The following environmental and climate areas are part of our strengthened commitment:

- Taking broad responsibility for the environment and preserving biodiversity
- Reducing greenhouse gas emissions and managing climate risk

These priorities contribute to three of the UN's Sustainable Development Goals:



HIGH STANDARDS WITH RESPECT TO THE ENVIRONMENT, WORKING CONDITIONS AND ETHICS THROUGHOUT THE VALUE CHAIN



REDUCE GREENHOUSE GAS EMISSIONS AND MANAGE CLIMATE CHANGE



TAKE COMPREHENSIVE ENVIRONMENTAL RESPONSIBILITY AND PRESERVE BIODIVERSITY

### Holistic responsibility for environment and preservation of biodiversity

The UN has designated 2021–2030 as the world's decade for the restoration of ecosystems. The UN's SDG 15 is about protecting, restoring and promoting sustainable use of terrestrial ecosystems and halting biodiversity loss. Statnett aims to reduce the environmental impact of our facilities and our activities to an even greater extent than that required by law. We place particular emphasis on reducing greenhouse gas emissions and preserving biodiversity and landscapes. This is where our activities have the most impact. To achieve environmental and climate improvements, the environment and climate must be an integral part of all our planning and operations.

#### Compliance with requirements

We comply with environment-related statutory provisions and political directives. In line with Proposition to the Odelsting No. 62 (2008–2009), we always try to meet the need for additional transmission capacity through limited use of the natural environment. Report to the Storting No. 14 (2011–2012) "We build Norway – concerning the development of the power grid" states that an in-house or third-party impact assessment must be performed with respect to any measures we implement, and that affected parties must be involved. This is implemented through

legislation and is monitored through processes involving choice-of-concept studies and licence processing.

In our planning work, we assess whether it is possible to restructure or remove older power lines when developing the power system. Voltage upgrades of existing power lines are an example of a measure with a limited need for new interventions in the natural environment, in addition to reducing energy losses per transported MWh. As part of the licensing terms for major development projects, the authorities require us to draw up an environmental, transport and construction plan (MTA plan), which describes environmental considerations and mitigating measures in the construction and operation phases. This plan underpins the construction work to be carried out and is taken forward into subsequent operation of the facilities. Where licensing terms do not include the preparation of an MTA plan, we safeguard environmental considerations and mitigating measures during the construction and operation phases through internal control systems, in accordance with the requirements of the Energy Act Regulations.

#### Biodiversity

Changes to the natural environment are the biggest threat to biodiversity, and Statnett works actively to reduce the negative impact of our encroachments on nature. We must limit total land use and preserve valuable nature. In the years to 2030, we will actively facilitate biodiversity in and around our facilities, and ensure that this is an integral part of the planning and operation of our facilities. In order to preserve biodiversity, we work continuously to improve our knowledge and implement best practices. We consider habitat types and species distribution when planning and selecting solutions, and during construction and operation of facilities.

Where we do not have the opportunity to avoid affecting biodiversity, we put in place measures to limit or mitigate effects from our construction activities. This may include restrictions on where and when construction activity is permitted during vulnerable periods, such as during breeding seasons for endangered and vulnerable bird species, and during reindeer calving periods. We also implement measures such as limited tree felling and limited ground transport. The same measures may also apply to the operational phase.

We restore construction sites, temporary roads and on-site accommodation areas, as well as any damage to the terrain, in line with [Statnett's terrain management](#)

### Greener Natural Intervention and Reduction in Greenhouse Gas Emissions linked to Construction Work – GRAN

The [GRAN](#) research project, which was completed in 2021, aimed to improve and further develop the planning and implementation of mitigating measures in construction projects. We have done this by looking at how different methods for landscape management in the construction phase affect regrowth and species diversity. In addition, we have developed a calculator to calculate greenhouse gas emissions from the carbon stored in the soil, and we test how we can facilitate good cooperation between professional groups in practice.

In 2021, GRAN, in collaboration with the NTNU University Museum, has carried out experiments on how to restore peat moss to its natural state as quickly as possible. Peat moss is a key species in bogs that, among other things, helps to slow down emissions of the greenhouse gas methane. Experience shows that it is difficult for peat moss to re-establish itself after restoration of previously excavated bog areas.

In 2020 and 2021, we established several experimental fields, including under a pylon on the 420 kV line between Namsos and Hofstad. Cut pieces of peat moss were strewn over the fields, and then covered with straw to prevent the peat moss from drying out or blowing away. After two growing seasons, the peat moss has managed to establish itself, especially where the water level is high.

This simple method appears to be very suitable and useful for facilitating the regrowth of peat moss, both in Statnett projects and for others who excavate in bog areas.



Photos from Magni Olsen Kyrkjeeide (The Norwegian Institute for Nature Research) and Marte Fandrem (NTNU Science Museum). Read the full story (in Norwegian) [How can we restore bogs?](#) on [nina.no](#).

[handbook](#). The handbook was revised in 2020 on the basis of experience derived from its practical application.

In 2019, we started working on surveying non-native species at our substation facilities in South Norway. The survey showed that measures to prevent the spread of non-native species in vulnerable areas were recommended at around 20 per cent of our substation facilities. In addition, we are considering measures for a further 30 per cent of our facilities. Based on the results, we prepared a guide in 2021 for managing non-native species.

### Bogs and wetlands

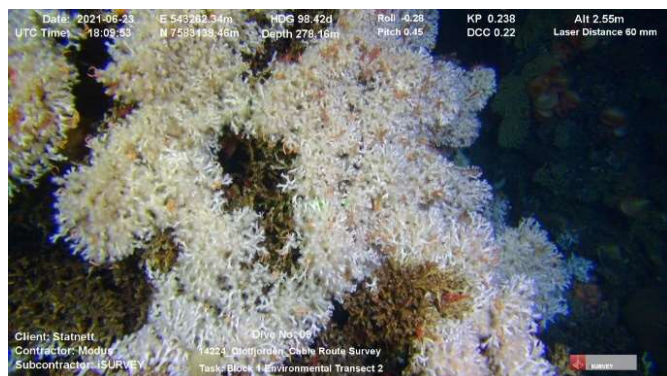
Bogs and wetlands cover about 10 per cent of Norway and have an important ecological function as habitats for many species. At the same time, wetland areas regulate flooding and store large amounts of carbon. In recent years, Statnett has been working actively to avoid new interventions in bog areas, as well as to prevent bogs from being drained after interventions, in order to maintain the water level. In

addition, through the GRAN research project (see text box), we have gained increased knowledge about how we can reduce the environmental impacts if an intervention is necessary in this type of area.



## Life below water – marine environment

In 2021, Statnett carried out an early survey of a new route for a new cable connection across the Ofotfjord. Existing cables run through a rich coral area, consisting of both coral reefs and soft corals. Early surveys will enable us to plan a new route so that vulnerable natural habitats are damaged as little as possible. The photos below were taken in connection with this survey and show soft corals (*Alcyonacea*) and the deep water corals (*Desmophyllum pertusum*).



In 2021, Statnett completed the construction of interconnectors to Germany and the UK. The cable to the UK, from Kvilldal in Suldal Municipality in Rogaland to Blyth in England, passes a well-known coral area in Midsundet, at the entrance to Sandsfjord. There is a ban on bottom trawling in the area to protect vulnerable marine habitats. The coral deposit was taken into account when the routes were being planned, so that the cables could be installed without major damage to the coral structures.

Our new business area, Offshore Development, focuses on how we can develop a sustainable offshore grid that facilitates new renewable energy while also taking into account the impact on nature and the environment. Read more about this in the chapter on interconnectors and the offshore grid.

## Landscape

When we plan new facilities, we must always use best practices and find solutions that blend in with the surroundings. Among other things, we use laser scanning and three-dimensional modelling of the terrain to make it possible to select options that take into consideration the form and features of the landscape. We have prepared a standard for forest clearance for power line routes to reduce the visual impact of power lines in forests. In addition, we camouflage power lines, pylons and insulators where this has an effect, remove old equipment and use new types of pylons to reduce their visibility. In 2021, we built 4 km of camouflaged pylons and removed 96 km of power lines.



Camouflaged pylon. Photo: Line Sunniva Østhagen

## Pollution and waste

Transformers contain large amounts of oil. As a safety measure against the oil leaking into the ground in the event of any defects or accidents, we have installed catch basins under all our transformers. As an additional barrier against the risk of negative impact on nature and the environment, Statnett has also chosen to use oil separators as standard. The oil separators meet the same operation and maintenance routines as those at the facilities where this is a requirement. For facilities that we have taken over due to the Third Energy Package, we plan to install oil separators where they have not already been installed. In 2021, we planned the installation of oil separators at four substations, and work has already begun at two of them.

Waste statistics can be found on page 155.



## Environmental incidents

### Goal: Zero major emissions or environmental damage

Incidents that have a serious or irreversible environmental impact are reported to the project owner and to Group Management. Two such environmental incidents were reported in 2021, as well as a major leak of SF<sub>6</sub> gas (sulphur hexafluoride) from a facility under construction.

One environmental incident was an oil leak from capacitor banks in connection with a demolition. It was discovered that oil leaked from a container where the discarded capacitor banks were stored during the demolition process. Necessary measures were implemented, and the incident was reviewed locally in relation to waste management.

The other environmental incident was an oil spill in connection with the draining of a transformer catch basin via an oil separator. Due to the high water flow in the oil separator, oil leaked into a nearby water source. As soon as the oil leak was discovered, damage mitigation measures were implemented using the substation's own oil spill containment equipment. The local fire service was contacted, and it was concluded that no further measures were necessary.

While the new Sogn substation was still under construction and before it was taken over by Statnett, a total of 271 kg of SF<sub>6</sub> gas leaked out as it was being refilled. A total of 271 kg of SF<sub>6</sub> gas was released. The leak was reported to the authorities by the contractor who carried out the refilling and entered it in their SF<sub>6</sub> accounts. The contractor conducted an investigation into the incident. Statnett takes the leak seriously and has implemented measures to prevent similar incidents.

## Reduction in greenhouse gas emissions

### Goal: 25 per cent reduction in 2025, 50 per cent reduction in 2030, 0.15 per cent emission rate of total SF<sub>6</sub> installation in 2025.

Statnett will reduce its own emissions in accordance with the Paris Agreement and the Norwegian Climate Act, and will in 2022 start the process of setting emission targets in line with the Science Based Targets initiative (SBTi). We are affected by climate risk, in the form of both climate change, which could impact our facilities, and due to more

stringent climate policies. We systematise our work with climate risk and provide a TCFD index in this report according to the Task Force on Climate-Related Financial Disclosures (TCFD).

Statnett has set a goal of reducing greenhouse gas emissions by 50 per cent by 2030, compared with 2019. This includes emissions from our own operations, encroachments on nature and our contract partners. We have set a goal of reducing our own emissions by 25 per cent by 2025, compared with 2019. We have assessed our emission sources on the basis of size, climate risk and realistic measures. Based on these assessments, we have identified climate-related measures that will enable us to reach our goals in the short and long term.

The figures for 2021 show that Statnett's greenhouse gas emissions have been reduced by 12 per cent from 2019. Total greenhouse gas emissions were sharply reduced in 2021 compared with 2020. This is largely because emissions relating to network losses were reduced due to a higher proportion of renewables in the electricity imported into the Norwegian power system compared to 2019<sup>1</sup>.

As a consequence of the pandemic, travel activity was low in 2021, which led to lower emissions from air and business travel, as well as lower emissions related to the heating of office premises and buildings.

A major climate challenge in the power industry is the use of the potent greenhouse gas SF<sub>6</sub>, which is used as an insulating and extinguishing agent in encapsulated systems (GIS systems) and in other components such as circuit breakers. We are striving to reduce SF<sub>6</sub> gas leaks from our facilities and have implemented several measures in 2021. These included improved maintenance routines and the technical qualification of alternative gases. The goal is to reduce emissions from our total inventory of SF<sub>6</sub> gas to 0.15 per cent by 2025. In 2021, the emission rate was 0.17 per cent, a decrease from 2020.

Alternatives to SF<sub>6</sub> gas with a greatly reduced climate impact are available for facilities up to 132 kV and on passive components at the highest voltage level (420 kV). The alternative to SF<sub>6</sub> gas on active components is still not commercially available.

Statnett has technology-qualified use of those alternatives available in the supplier market and several new facilities have already been designed with this technology. The new

<sup>1</sup> For Norway's National Electricity Disclosure, see: [Where does the electricity come from? – NVE](#) (in Norwegian). The National Electricity Disclosure gives a picture of the average CO<sub>2</sub> emissions related to the consumption of electricity in Norway in a given year. The CO<sub>2</sub> factor will vary from year to year, depending on how much electricity we produce in Norway, how much we import from abroad and which energy sources are used in the countries from which Norway imports electricity.

Hamang substation in Viken will be the first substation in Scandinavia where alternative technology will be used on passive components at 420 kV voltage level when the substation is put into operation in 2023.

In the supplier market, work is now underway to develop and make solutions available for SF<sub>6</sub>-free systems also for active components at the 420 kV voltage level. Technology development is fast, and we will use new technology when it is available, both for new and existing facilities. It was decided in 2021 that both Ulven substation in Oslo and Skaidi substation in Finnmark take a preassumption that SF<sub>6</sub> alternative technology is qualified and available for both passive and active components until development begins.

In order to achieve the goal of a 25 per cent reduction in greenhouse gas emissions by 2025 and 50 per cent by 2030, there is a need to implement more powerful measures. We follow up our endeavours in this area through goal management and action plans in relevant departments in the company.

Relevant measures to reduce Statnett's emissions include working systematically to reduce SF<sub>6</sub> leaks from our facilities, increasing the number of electric cars in our vehicle fleet, increasing the use of drones instead of helicopters and reducing business travel. The greenhouse gas emissions target for 2030 has a greater scope and requires a major shift, which will require us to evaluate new project design methods and how to engage in the circular economy, as well as the use of new materials and solutions with lower climate footprints during production, construction and operation.

The estimated greenhouse gas emissions linked to purchasing of materials indicate that this is one of our largest sources of emissions. We are therefore working to introduce climate-related requirements in our contracts. Construction work at new sites is another major source of greenhouse gas emissions. This is why we require fossil-free and emission-free construction sites in all projects where there is a mature supplier market. In 2021, we started fossil-free construction at our new Hamang

substation in Bærum. Construction of the new Fagrafjell substation in Rogaland will also be carried out fossil-free. Our greenhouse gas accounts can be found on page 156-157.

### Climate, weather and physical climate risk

Climate change means that we must prepare for more frequent occurrences of extreme weather and changes in precipitation patterns. Some places will experience less precipitation, while it will rain and snow more in others. More extreme precipitation is likely, and we must also prepare ourselves for landslides and floods in the vicinity of our facilities. The weather influences electricity consumption and renewable power production, and therefore also transmission requirements. It also impacts the load on the grid. For power lines, variations in both weather and vegetation play an important role.

We experience operational disruptions in years that gives us a lot of extreme weather and lightning activity. The number of faults on power lines has remained relatively stable at 60–90 per year over the past five years. This is lower than in the previous five-year period, when we suffered several extreme weather occurrences. Less than 10 per cent of the faults on power lines are of lasting duration and require repair.





**Icebox**

Through the R&D project Icebox, Statnett seeks to significantly reduce accidents and outages related to icing. By developing a national icing map, which will be publicly available, we can both make smarter choices for power line routes, while also gaining an overview of the vulnerability of existing power lines. The icing map will also include assessments of future climate change. The development and use of ice load sensors in combination with icing forecasts will also make it possible to monitor and predict icing on vulnerable power lines so that preventive measures can be taken.



*This photo was taken at Ålvikfjellet in 2014. Here, there was an estimated 60–70 kg of ice per metre, which is a good illustration of the icing problems we experience in some parts of the country. Photo: Ole Gustav Berg*

**Climate adaptation of critical infrastructure**

Statnett must ensure safe operations and an efficient power supply, regardless of the weather. Planning and scenario analysis are important tools for preventing damage and adapting to climate change. The vulnerability of the grid is of great importance for how society is affected by change. There are better and better methods for calculating how wind, snow and ice create extra strain on our power lines. This provides guidelines for where pylons are placed in the terrain, and for the technical solutions for pylons and power lines. We work purposefully to increase our knowledge of climate impacts and climate change, as

well as to develop methods and technologies, and to build reliable power transmission facilities.

**Political change and adaptation risk**

Climate change and the measures needed to combat it affect society. We expect to see further requirements for more climate-friendly solutions included in legislation and standards. This affects us, and we aim to ensure that technology, choice of materials and solutions in the future has a low environmental and climate impact. We are monitoring political developments and assess which decisions affect us directly and indirectly.

Norway has set ambitious climate goals, and it is probable that the legislation will be stricter in other sustainability-related areas in the years to come. We include this in current decision-making processes to reduce risk. Statnett has activities in and around several of Norway's major cities, and many Norwegian municipalities have ambitious climate targets. In Oslo and Bergen, for instance, there have been demands and new regulations for fossil-free and emission-free construction sites in recent years. At Statnett, we work to ensure that fossil-free and emission-free construction sites become the standard in the long run.

The 2020 national budget states that it may be appropriate to levy a specific tax on SF<sub>6</sub>. At the end of 2018, storage and consumption of SF<sub>6</sub> became subject to a reporting requirement in Norway. Report to the Storting No. 13 (2020-2021) Climate Plan for 2021–2030 states that the government will evaluate measures to reduce both the use of and emissions from SF<sub>6</sub>.

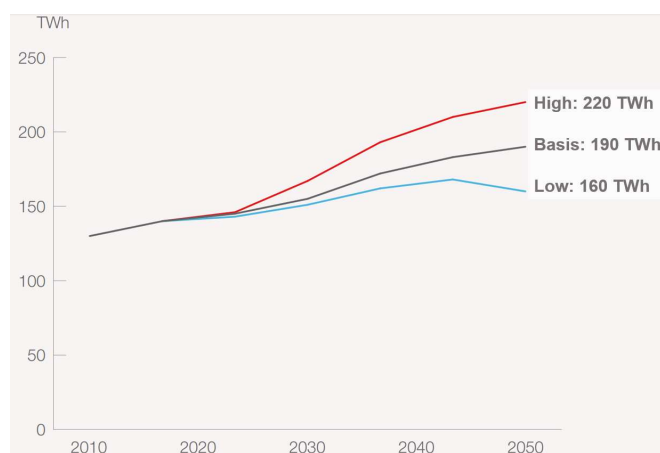
In June 2021, Report to the Storting No. 36 (2020–2021) "Energy for work – long-term value creation from Norwegian energy resources" was published. The report states that Norway's position as an energy nation will be further developed through investments in new industries such as hydrogen and offshore wind, by strengthening the power grid and by having a progressive oil and gas industry with low emissions. The report builds on Norway's climate plan and shows how renewable energy and the power grid will lay the foundation for electrification and phasing out of fossil energy.

The green transition is here now, and we are seeing an increasing number of requests to connect to the power grid across the country. Since 2018, we have processed applications representing approximately 26,000 MW of volume, where most of it is consumption. Data centres, electrification of the oil and gas industry and new green industries make up most of the plans. Activity is distributed throughout the country, but we see the greatest activity along the west coast and in the south, as well as the inner parts of Nordland and Vestfold and Telemark counties.

### Climate risk reporting

The recommendations from the Task Force on Climate Related Financial Disclosures (TCFD) have become established as a central framework for how to analyse and report climate risk<sup>2</sup>.

The scenarios on which we base our analyses were most recently presented in our [Grid Development Plan 2021](#), see pages 37–47, where we show that Europe, the Nordic countries and Norway are in the midst of a radical change in the power system, with increased power consumption, increased renewable production and the phasing out of fossil-fuelled and nuclear power plants. Offshore wind farms are a key element of Europe's green transition, and a large proportion of the new generating capacity is expected to be built in the North Sea. The development towards a zero-emission society is moving fast, and we are adapting to the increased pace. We are preparing for a major increase in power consumption, up to 220 TWh of annual consumption in 2050 compared to 140 TWh today



Statnett's risk management and internal control processes cover the entire business, including strategic, market, operational and financial matters. Holistic risk management ensures that risks relating to sustainability, safety and the supply of electrical power, facilitation of value creation, financial position and reputation are maintained at an acceptable level. Statnett's most important tasks are to deliver a secure power supply 24/7, electrification and green value creation, as well as the power system of the future, both onshore and offshore. There will always be strategic, operational and financial risks associated with goal attainment. In the risk management process, we identify and manage all probable risks across the company. You can read more about this on page 41 of our annual report. We have included reporting on climate-related risks throughout our annual report and sustainability report. Below, is a table showing where in the annual report we report according to the TCFD framework.

<sup>2</sup> You can find the TCFD framework here: <https://www.fsb-tcfd.org/>.

Finance Norway has also drawn up a guide (in Norwegian): <https://www.finansnorge.no/tema/baerekraft/klimarisikorapportering/>



## TCFD index

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## Our social contributions

Statnett ensures that everyone working at and for the company enjoys safe working conditions as well as a decent salary and employment terms, and respect for freedom of association. We also aim to be an attractive employer, who provides equal opportunities to our employees, irrespective of gender or background.

Statnett's workplace priorities:

- Ensuring all employees enjoy a safe working environment
- Ensuring decent employment and working conditions throughout the supply chain
- Increasing workforce diversity with respect to competence, background and gender

These are linked to several of the UN's Sustainable Development Goals:



### Ensuring all employees enjoy a safe working environment

**Goal: Zero injuries and unwanted environmental impact**

Many Statnett employees perform tasks involving an inherently high level of risk. The safety of our employees is our main priority.

Statnett's work with health and safety is founded on a "zero vision" and is based on compliance with the comprehensive regulations that have been developed to prevent injuries in the workplace. Having a "zero vision" presumes that every accident can be prevented and that the safety of the individual must come first. This is carried out through conscious and focused management, training and inspections through the safety representative scheme, through employee representatives and through our statutory internal control system, as well as through the Working Environment Committee (AMU).

Statnett will further develop itself as a professional construction client, and we set high standards for those we contract to work on our behalf. We are constantly

improving our work processes based on knowledge about safe working methods, ongoing risk assessments and systematic training. We expect that the "zero tolerance" also is applied to the activities of our contractors and subcontractors. Contractors are responsible for developing procedures and providing proper training for their own employees. They also have a duty to ensure that their subcontractors comply with the requirements set by Statnett and laid down in applicable regulations.

During 2021, there has been a steady improvement in lost-time injuries (H1 indicator) in our projects, from 6,6 to 4.0. This corresponds to six lost-time injuries, which is a reduction from 13 lost-time injuries in 2020. There has also been a reduction in electrical safety incidents in recent years as a result of closer monitoring of contractors. New requirements in the Construction Client Regulations came into force in 2021. Statnett has addressed the changes in part by implementing measures to incorporate the new requirements in governing documents and processes.

The year 2021 was characterised by strict infection control measures and higher rates of infection for building and construction workers compared with 2020. Among other things, this led to fewer construction site inspections, which means that safety officers had a limited opportunity to closely monitor construction site conditions.

The table on health and safety on page 151 in our sustainability accounts provides further details in this area.

### The safety climate under the microscope

In 2021, a survey of the safety climate in the operating organisation was carried out. The results show a strong safety commitment among employees and good safety communication. However, there is a need to implement measures to enhance risk management in the company.

Weekly reviews are carried out of all cases registered in our non-conformance system. This forms the basis for initiatives based on Lessons Learned and learning reports that are widely distributed in the operating organisation.

### Management of accidents and injuries

Systematic follow-up of unwanted incidents and hazardous conditions means that we prevent accidents and incidents, and identify and utilise learning potential. In 2021, there was a significant reduction in the number of incidents with a serious potential for harm, compared with 2020. Our SIF indicator (serious incident frequency) has fallen by 63 per cent in the last 12 months. This



positive development is probably the result of improved quality of follow-up of implemented initiatives through performance management, clearer expectations related to HSE management practice, as well as strengthening of processes related to learning and interaction between specialists and management. Our internal lost-time injury statistics continue to show a positive trend, and at the end of 2021, we registered the lowest value in five years.

### Compliance procedures

In 2021, we used our internal HSE control system to ensure compliance with statutory regulations, as well as internal and external requirements and standards. We have established a mandatory course for all operational managers in the company. The course programme encompasses basic training in the relevant regulations, as well as practical training in systematic HSE work, including the establishment of local risk registers linked to the operation of construction sites and real property. We conduct systematic competence development through training courses for managers and employees in relevant regulations and procedures, in areas such as labour law, contract law, pay and working conditions, and work with live electrical equipment.

### Working environment

Due to the pandemic, many employees had to continue working from home in 2021, when it was mandated or recommended by the authorities. With the majority of our employees working from home, we have been able to protect our operations-critical functions.

At the outset of the pandemic, we quickly implemented a number of measures to ensure a good working environment and reduce the risk of infection. Through 2021, we continued, adapted and introduced new measures. We have had cases of infection both among our own employees and in our projects, without major negative consequences. We closely monitor cases of infection and assess each case on an individual basis with regard to risk and potential measures.

The interdisciplinary emergency response group that was established in early 2020 has been active throughout 2021 and will function as long as it is needed. The Group adjusts its activity level based on the infection situation and the internal need for response measures. The Group reports regularly to Group Management.

During the pandemic, three working environment surveys were conducted among the employees. The surveys' questions focused on work tasks, social relations with co-workers, ergonomics, collaborative working, digital tools

and management. Based on the results of the surveys, measures have been implemented to improve social and ergonomic conditions. Employees who have needed additional measures to facilitate working from home have received individually tailored solutions based on dialogue with their line manager, the HR department, the business unit management and the Covid-19 emergency response team.

The occupational health service takes part in inspections and is represented on the Working Environment Committee (AMU). In 2021, a total of 31 occupational health and safety districts were established nation wide in Norway, primarily in the operating areas and at the administrative buildings. Every such district has a local HSE group where the local safety representative and a representative of the employer hold regular meetings and report to the Working Environment Committee each year.

### Whistleblowing

Statnett's Ethics Ombudsman received a total of 58 reports in 2021. The vast majority of these were of such a nature that a solution was found relatively quickly. A few cases involving internal working conditions and our suppliers were more demanding.

In the first half of 2021, the Covid-19 pandemic made it difficult to follow up on certain issues, particularly reports relating to terms of employment at our suppliers. These cases are followed up by our department for employer liability, working closely with the Ethics Ombudsman, who is responsible for dialogue with any whistleblowers.

Information and training with respect to our Ethics Ombudsman arrangement and codes of conduct is part of our onboarding process for new employees. Project-specific courses have also been held, with the focus on tackling work-related crime.

### Decent employment and working conditions throughout the supply chain

Statnett safeguards human rights and acts in a socially responsible manner. Our approach is based on the International Labor Organization's eight core conventions. This also applies to our suppliers and other contractual partners. We expect contracting parties in all countries to comply with our requirements for pay and working conditions and our partners and suppliers to respect the right to organise and human rights.

The Transparency Act is designed to encourage companies to respect basic human rights and decent working conditions, and ensure public access to

information. It will enter into force on 1 July 2022. Statnett is currently working to build up competence on the Transparency Act. Statnett's guidelines and internal systems must comply with the requirements of the Transparency Act, and we will establish good procedures for how to handle requests for information.

### Sustainable purchasing

Sustainable purchasing is about doing more with fewer resources and promoting the circular economy. As a major buyer, Statnett is in a position to influence the supplier market and stimulate innovation.

In 2021, Statnett paid NOK 7,280 million to 4,597 different suppliers. The largest payments were made to building contractors and for the purchase of materials for the construction and operation of our facilities. We will use our purchasing practices to promote decent working and environmental conditions for all contracting parties and ensure freedom of association and respect for human rights. This is in accordance with Section 5 of the Public Procurement Act and is embedded in our purchasing guidelines. For all purchases, we require suppliers to accept and comply with our Supplier Code of Conduct and meet requirements regarding pay and working conditions. In addition, they must not be on the sanctions list of the US Department of Treasury's Office of Foreign Assets Control.

In our Supplier Code of Conduct, we draw special attention to the fact that we may reject suppliers who are excluded from investment by the Norwegian Government Pension Fund Global at the recommendation of the Council on Ethics, or who are registered on the joint list of ineligible firms and individuals drawn up by the World Bank and other development banks.

### Supplier selection

Suppliers must undergo a qualification procedure to ensure they can deliver according to our contracts and comply with requirements. This process involves documenting that they have well-functioning systems for HSE, environmental management and quality.

For services or products assessed to be high risk, the qualification procedure includes audits and site visits. High-risk suppliers are audited regularly by means of the Achilles Utilities NCE qualification system and Statnett's own audits. Statnett's audits increasingly look at the risk of human rights abuses, serious environmental damage, violation of labour rights, including employees' freedom of association, as well as unethical behaviour.

Statnett has conducted an ongoing dialogue over several years with the Norwegian Tax Administration and the

Labour Inspection Authority in the regions where our biggest projects are based. We have an agreement on information exchange with the Norwegian Tax Administration, which means that we can check suppliers against the Norwegian Tax Administration's registers before entering into contracts and in subsequent contract monitoring. The agreement is used for contracts within identified risk areas and is thus a tool for excluding disreputable suppliers in contracts within building and construction, and the provision of trades services, cleaning services, transport and canteen operations.

### Follow-up of wages and working conditions

For Statnett, it is important to carry out systematic checks to ensure compliance with the provisions on pay and working conditions in our contracts. Breaches of provisions related to pay and working conditions may be so serious as to verge on the abuse of fundamental human rights. We carry out inspections based on an internally developed approach, where we systematically collect and check written information from the supplier and in parallel conduct interviews with the workers in their native language. This provides us with a basis for comparing the written information obtained from the employer with oral feedback from the employees. Workers from low-cost countries are prioritised during inspections of suppliers at construction sites. We assess the risk of non-conformances based on the individual countries' history in this field and our own experience with suppliers.

In 2021, we carried out inspections of all major suppliers that use foreign labour at our construction sites. No significant non-conformances were discovered.

### Trade unions

Statnett recognises and appreciates the value of the Norwegian working-life model. This includes the tripartite cooperation between the government, the trade unions and employer organisations, and the local two-party cooperation. Good relations between management and employee representatives at individual firms are vital to companies' development and to their ability to adapt and rationalise. We aim to have a high level of trade union coverage, and take steps to enable the various trade unions to operate effectively and constructively. Employee representatives must have a genuine opportunity to exert an influence. This is achieved through an ongoing, open dialogue with the trade unions in order to ensure an exchange of information and views on matters important to employees.



The employees elect three members to Statnett's Board of Directors, with several of the trade unions drawing up lists of candidates. The employees are also represented on the board of the pension fund, the pensions steering group and the Working Environment Committee

### Young Sustainable Development Goals Innovators Programme (YSIP)



*Statnett's participants in the YSIP programme, Silje Christine Bugge, Kim Allgot and Hanne Lovise Jore*

In 2021, three representatives – innovators – from Statnett participated in the UN Global Compact's Young Sustainable Development Goals Innovators Programme (YSIP). The programme lasts for ten months, and is aimed at young professionals aged 18–35 who work in a company that is a member of the UN Global Compact. The goal of the programme is to enable future leaders to develop and push forward innovative solutions, through new technology, initiatives and business models.

During the programme, the innovators identified a problem in the company and came up with proposals for a solution. The chosen issue for this year's innovators was "How can Statnett use its procurements to contribute to the UN's Sustainable Development Goals?"

The report from the YSIP innovators analysed more than a hundred completed procurements, and assessed whether they utilised the potential of the instruments available in the purchasing process. The report identifies several areas and associated measures to ensure that Statnett's procurements contribute to the UN's Sustainable Development Goals. The measures identified during this work will be included in our ongoing work to improve our purchasing framework.

The YSIP innovators have presented their report to Group Management and written several internal communications to shed light on the issue and sustainability in general. This has generated engagement among both management and employees. Statnett plans to nominate new innovators for the YSIP programme the next time it is implemented.

### Gender equality, inclusion and diversity

For Statnett, it is important to be an attractive employer, irrespective of employees' background or gender. We must safeguard employee diversity with regards to gender, age, ethnicity, geographical residence and education. Women and men with approximately the same education/training and experience must receive equal pay. This is described in governing documents, where we use the ILO's core conventions as a basis.

We aim to raise the proportion of women in the workforce, and increase diversity. This is an important factor if we are to cultivate a larger number of talented people in various professional fields. We therefore actively focused on increasing diversity during our 2021 reorganisation process. During the reorganization, we were conscious to have a range of gender, age and geography for new leaders.

This has resulted in a marked increase in the proportion of women in management positions at all levels, from 25 to 30 per cent, and a lower average age among Statnett's managers, from 50.8 years in 2020 to 49,3 years.

#### **"The future is diverse" – project initiated by this year's trainees in the autumn of 2021**

The trainees joined Statnett on 1 September and their first project was to propose measures for how Statnett can increase diversity. They looked at the status of diversity in Statnett today, what kind of diversity is relevant to the company, and how Statnett can proceed to increase and improve diversity. The project points out that diversity can be divided into two main categories: outer and inner. In this context, "outer" is everything you can see with the naked eye, such as gender and ethnicity, and has received the greatest public focus. Inner diversity is everything you cannot see, such as

ability, expertise, attitudes and experiences. Both types of diversity create a more inclusive workplace, but it also produces clear improvements in a company's level of innovation and performance.

The project group concluded that Statnett has shown little improvement in recent years in terms of the number of women and people with a foreign background in its workforce. This is despite the fact that diversity has been specified as a goal for the company for a long time. The new strategy emphasises that increased diversity is a priority area, and it is therefore even more important to show that this is an issue Statnett actually wants to do something about. In addition, inner diversity should have a greater focus among managers, both in the recruitment phase and when putting together teams. The project report highlights several measures to increase and improve diversity within Statnett.



*This year's trainees: Krishna Øyvard Bjørlin Solberg, Kjeld Fjeldberg, Oda Goa Berge, Christine Brinchmann, Sander Grønli Nordeide, Tuva Eikås Hagen.*



In the recruitment of apprentices and summer students, we pay close attention to gender balance. When we recruit new apprentices, representatives from Statnett travel to selected upper secondary schools to talk about the power industry and promote Statnett as an attractive apprenticeship for both women and men. The proportion of women in the classes we recruit from is low, but we have nevertheless succeeded in recruiting female apprentices in recent years. As of 31.12.2021, Statnett had 30 apprentices, of which three were women. One of these started in 2021. In Statnett's annual summer project "Kube", half were women in 2021.

We want to increase our managers' competence with regard to diversity, encourage women to apply for positions and be aware of how we present ourselves and how we word our job advertisements. To a greater extent,

arrangements will be made for English to be adopted as the working language in relevant departments. Employer branding, brand-building and knowledge of Statnett further contribute to meeting our performance management goal of increasing diversity in the company.

At Statnett, we want to have satisfied employees with high motivation and managers who show clear direction, develop their employees and deliver results. Through quarterly organizational surveys, we gain insight into commitment and employee satisfaction, and based on the results, we can work actively with measures in departments, sections and teams.

We will continue to work to increase the systematics around our work with gender equality, inclusion and diversity.





Statnett's life phase policy aims to accommodate employees of all ages. We offer a company kindergarten and social committees, and we have an active sports team. Initiatives under our seniors policy, such as an additional week's holiday and training opportunities, help to keep the average retirement age high.

In 2021, 93.8 per cent of fathers at Statnett took paternity leave.

Of Statnett's 1,594 permanent employees, 98.4 per cent are employed in 100 per cent positions. Nine cleaners (all women) work part-time at different locations around the country where the scope of work does not allow for a higher percentage position. There are 16 employees who work reduced hours due to partial disability or at their own request. Women make up 44 per cent of all part-time employees.

For younger employees, we have a dedicated group called "Young at Statnett", which arranges both professional and social events. Much of 2020 and 2021 has been spent online, and several of Statnett's young employees clearly expressed the importance of their network and the social aspects of the workplace when pandemic-related lockdowns made social contact difficult.

In 2021, we staged our trainee programme and hired summer interns as normal, despite the pandemic.

### Competence and employee development

Statnett is a competence-based company. It is important to further develop the organisation's business-critical core competences.

All employees complete compulsory courses and can participate in relevant courses through our competence portal. Development of the individual employee's competence is monitored through compulsory follow-up meetings with their manager.

Statnett has an ambition to work more systematically with strategic competence management, which provides a framework for how we will develop competence to meet tomorrow's needs. We want to promote temporary job internships and controlled job rotation within the organisation. This helps managers and employees to broaden their competence, putting us in a better position to meet the demand for new skills. Talent development programmes and succession planning are also part of the action plan. All new managers and project managers at Statnett attend compulsory management training courses, covering corporate governance, HSE, employment law and our pay policy.



## Our contributions to sustainable economic growth

In 2021, we saw records in both consumption and production, unusually high electricity prices, and major regional price differences within Norway. The year was characterised by great contrasts, at the same time as we see that the green transition is well under way in the energy supply sector. Sustainable economic growth is linked to several of the UN's Sustainable Development Goals, and the following SDGs are important for Statnett:



To create value in a sustainable way, we must maintain a high ethical standard and make clear demands on our own employees and our suppliers. This will become more and more important due to increasing globalisation and less transparency in the supplier market. Therefore, we have defined the fight against corruption, human rights violations and unethical conduct in all activities as one of our priority areas.

We are clear that our responsibility to contribute to the UN SDGs extends beyond our own company to our contract partners as well. Long lead times in our project development and the long-term nature of our social mission mean that we must remain one step ahead of the societal changes that produce new requirements, new needs and new technology. This presumes that we maintain a good dialogue with our partners and other key actors, and work systematically to develop and adopt new technologies and competences.

Through clear requirements in our supplier code of conduct and dialogue with individual companies, we strive to ensure zero tolerance for corruption and all forms of bribery, fraud and unlawful business activity throughout the supply chain. We have drawn up codes of conduct for our own employees and our suppliers. We actively use our Supplier Code of Conduct when assessing contract partners.

### Local value creation

Our main contribution to value creation is the secure supply of electricity and the connection of new production and new consumption to the power grid. In addition, we contribute to local value creation by utilising Norwegian suppliers of all sizes. We divide our construction projects into multiple contracts, so that local and regional suppliers have an opportunity to offer their services. Read more about sustainable purchasing and supplier selection on page 64.

Statnett has a presence nationwide, and our local offices support local projects in sports, culture and work with children and young people. Because these projects are also intended to benefit the local community, applications for financial support are assessed by Statnett employees with local knowledge.

### Green financing

In recent years, banks and investors have increasingly been integrating consideration for people, society and the environment into their investment activities. This affects us because rating agencies specialising in sustainability have given us an ESG rating (Environmental, Social and Governance), which is used by our lenders. Good sustainability work can affect our financial framework and provide access to new lending markets.

In 2020, Statnett received its first two green bond loans totalling NOK 3.6 billion, with a further NOK 1.4 billion in 2021. Green bonds are loans intended to finance sustainable initiatives. Our green loans will be used to finance construction projects that will have a positive effect on the climate. The money will go to the Smestad–Sogn project, which will help Oslo achieve its climate ambitions and improve security of supply in the capital, as well as to the North Sea Link interconnector, which facilitates increased production and consumption of renewable energy in Norway and the UK.

Statnett has established a framework that describes which projects can be qualified as green. The framework has been qualified by CICERO (Center for International Climate Research). CICERO awarded Statnett the designation dark-green, which is the highest grade it is possible to achieve. We have established a cross-functional committee to assess projects. It is made up of employees with expertise in sustainability, analysis and finance.

The aim of the EU's action plan for sustainable finance is to facilitate sustainable activities. By creating a framework for sustainable finance, we hope to increase the financing of sustainable solutions and manage financial risk caused

by climate change. Statnett's main activity is expected to be in line with the EU Taxonomy Regulation. The taxonomy includes reporting requirements with which Statnett will comply when they apply to our business.

### Innovation to achieve the sustainable development goals

SDG 9 is about building resilient infrastructure, promoting inclusive and sustainable industrialisation and fostering innovation. Digitalisation, research and technology development are tools for innovation, which contribute to realising Statnett's goals. The development and application of new technology is vital to ensure that the significant investments triggered by electrification are sustainable, future-oriented, cost-effective and relevant. The development of a sustainable offshore grid is a good example of the need for significant technology development and innovation.

We work to promote innovation and technology development with partners in Norway and Europe. These include both research and teaching environments, as well as industry. Statnett cooperates, for instance, with other TSOs in the European network ENTSOE-RDIC (Research Development and Innovation Committee).

For Statnett, digitalisation is also becoming more and more important to its ability to properly fulfil our social mission. Better exploitation of power system data means that we can work smarter and more efficiently. More data and better analyses mean that more customers can be connected without us having to build new transmission networks.

#### Nordic Grid Development Perspective 2021

The Nordic TSOs, Energinet, Fingrid, Statnett and Svenska kraftnät, published the report [Nordic Grid Development Perspective \(NGDP\)](#) in autumn 2021. The report presents a common Nordic scenario "Climate Neutral Nordics", which assumes a high growth in electricity consumption in the Nordic region, up from the current 400 TWh to approx. 660 TWh by 2040. At the same time, the scenario assumes that the renewable energy production capacity will increase to more than twice today's level, from 85 GW to approximately 190 GW by 2040.

The report also presents an overall analysis of future power system needs based on this scenario. According to the analysis, the power system of the future will have a higher transmission requirement, and a substantial increase in grid capacity is needed. Furthermore, the existing flow patterns in the Nordic power system may change significantly in the future.

### Interconnectors and offshore power grid

Statnett has several subsea cable systems in operation, both nationally and internationally. NordLink to Germany was put into ordinary operation in 2021, and North Sea Link (NSL) to the UK was put into trial operation in June. The total capacity of these interconnectors is 2,800 MW.

The government announced in the White paper Meld. St. 36 (2020-2021) "Energy for work" that it will start work on a more detailed regulation of offshore system responsibility and pointed to Statnett as having the role of system operator, under the Offshore Energy Act, for cables and facilities not regulated by the Petroleum Act. In March 2022, the government decided to give Statnett the responsibility for planning the offshore grid.

In 2021, Offshore Development became a separate business unit in Statnett, and will be responsible for developing Statnett's role in connection with offshore wind and offshore grids. Important sustainability areas for the new business area include fisheries and use of the ocean space, as well as Statnett's emissions and impact on nature and the environment.

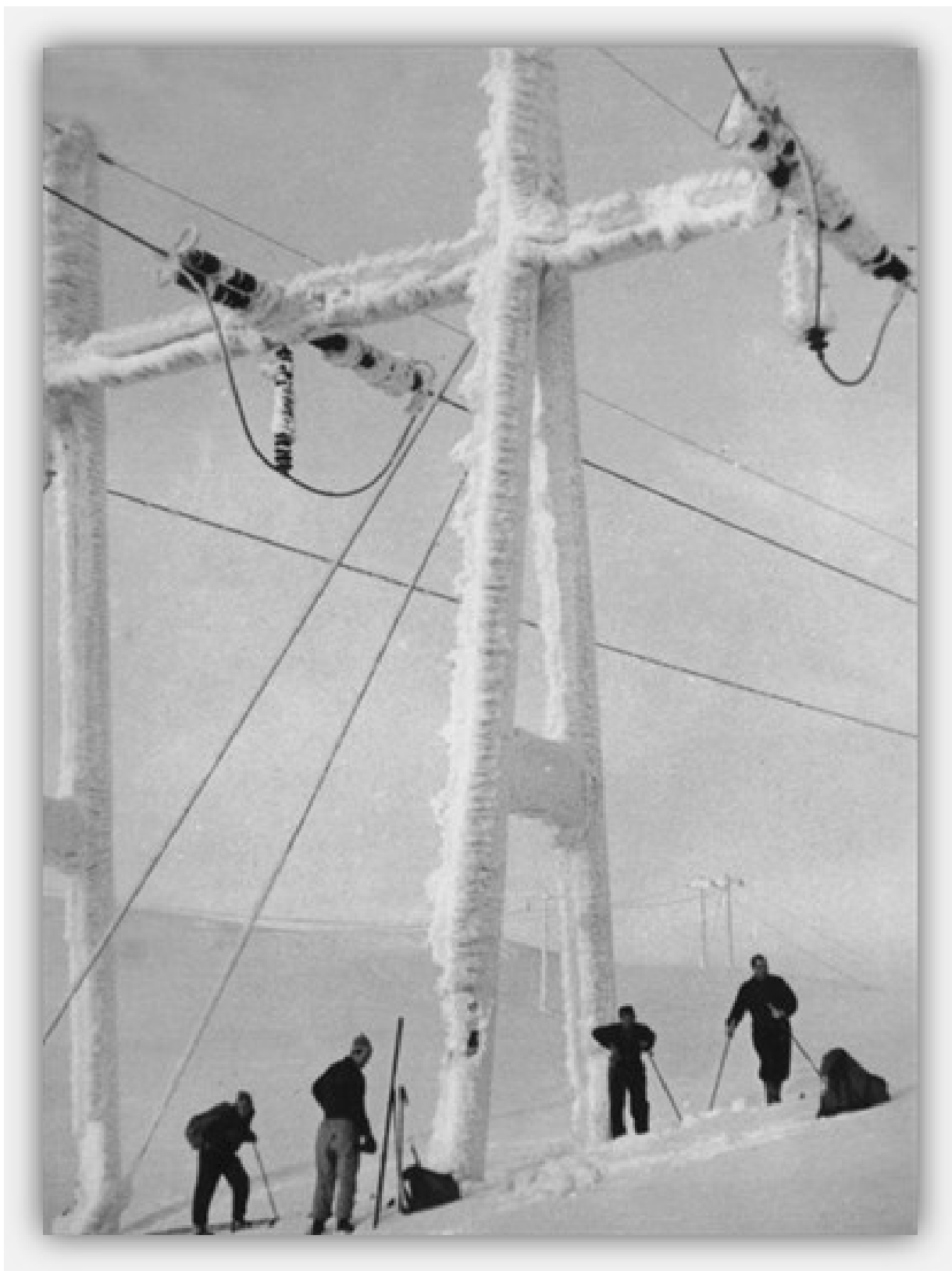
### Rights of Indigenous people

SDG 15, about life on land, means we must protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss. In addition, food security and the rights of Indigenous people are other important reasons for ensuring the sustainable use of our natural resources.

International law stipulates that the rights of Indigenous people must be protected in the planning and construction of grid facilities. In Norway, the provisions of the Nature Diversity Act, the Reindeer Herding Act and the statutory regulations on impact assessments help ensure that these rights are safeguarded. Through the licensing process, Sámi stakeholders will be given a real opportunity to promote their interests and to influence the content of the decision.

For the past 10–12 years, Statnett has had major power line projects in areas licensed for Sámi reindeer husbandry. In order to take the interests of reindeer husbandry into account as much as possible, we establish an early dialogue to gain knowledge about the organisation and land use of reindeer grazing districts. The dialogue continues through planning and construction of the facilities to ensure the mutual exchange of useful information and agree on possible measures to reduce the impact.





*The power line Nedre Vinstra – Fåberg – Oslo:*

The power line was very important for the capital's power supply in the early post-war period. This is Norway's tallest power line on concrete pylons. When it was put into operation, it was also the country's longest power line

# GRI disclosure 2021

GRI-disclosure	Description	Reporting	UN SDGs <sup>1)</sup>	Omissions
<b>GENERAL DISCLOSURES</b>				
102-1	Name of the organization	Statnett SF		
102-2	Activities, brands, products and services	Annual report, This is Statnett		
102-3	Location of headquarters	Oslo, Nydalen		
102-4	Location of operations	Annual report, This is Statnett and note 20		
102-5	Ownership and legal form	Annual report, This is Statnett and note 20		
102-6	Markets served	Annual report, This is Statnett and note 20		
102-7	Scale of the organization	Annual report, This is Statnett and note 20		
102-8	Information on employees and other workers	Sustainability accounts		
102-9	Supply chain	Sustainability report, Our contributions to sustainable economic growth and Sustainability accounts		
102-10	Significant changes to the organization and supply chain	Sustainability report, Our social contributions. No significant changes in 2020.		
102-11	Precautionary Principle or approach	Sustainability report, Our environmental and climate contributions		
102-12	External initiatives	Sustainability report, Responsible business and Our contributions to sustainable economic growth		
102-13	Membership of associations	Sustainability report, Responsible business and Our contributions to sustainable economic growth		
102-14	Statement from senior decision-maker	Annual report, A word from the CEO		
102-16	Values, principles, standards, and norms of behavior	Sustainability report, Responsible business and Our contributions to sustainable economic growth. Annual report, This is Statnett	16	
102-18	Governance structure	Annual report, auditor's report and Sustainability report, responsible business		
102-22	Composition of the highest governance body	Annual report, Statnetts board, Sustainability accounts	5, 16	
102-40	List of stakeholder groups	Sustainability report, Responsible business		
102-41	Collective bargaining agreements	Sustainability accounts	8	
102-42	Identifying and selecting stakeholders	Sustainability report, Responsible business and Our contributions to sustainable economic growth		
102-43	Approach to stakeholder engagement	Sustainability report, Responsible business and Our contributions to sustainable economic growth		
102-44	Key topics and concerns raised	Sustainability report, Responsible business and Our contributions to sustainable economic growth		
102-45	Entities included in the consolidated financial statements	Annual report, This is Statnett, Organizational structure and note 20		
102-46	Defining report content and topic Boundaries	Sustainability report, Responsible business		
102-47	List of material topics	Sustainability report, Responsible business		
102-48	Restatements of information	Sustainability accounts		
102-49	Changes in reporting	No significant changes		

GRI-disclosure	Description	Reporting	UN SDGs <sup>1)</sup>	Omissions
102-50	Reporting period	2021		
102-51	Date of most recent report	11. march 2021		
102-52	Reporting cycle	Yearly		
102-53	Contact point for questions regarding the report	Knut Hundhammer, e-mail knut.hundhammer@statnett.no		
102-54	Claims of reporting in accordance with the GRI Standards	GRI Standards core		
102-55	GRI content index	GRI disclosure 2021		
102-56	External assurance	Independent assurance report		

### MANAGEMENT DISCLOSURES

103-1	Explanation of the material topic and its boundary	Sustainability report, Responsible business		
103-2	The management approach and its components	Sustainability report, Responsible business		
103-3	Evaluation of the management approach	Sustainability report, Responsible business		

### ECONOMIC DISCLOSURES

201-1	Direct economic value generated and distributed	Annual report, This is Statnett, Financial framework and Financial reporting	8,9	
201-2	Financial implications and other risks and opportunities due to climate change	Sustainability report, Our contributions to sustainable economic growth	13	Statnett will in 2022 and onwards work to establish systems and methods for calculating economic impacts of climate change
405-2	Ratio of basic salary and remuneration of women to men	Sustainability accounts	5	
205-3	Confirmed incidents of corruption and actions taken	Sustainability accounts	16	

### ENVIRONMENTAL DISCLOSURES

302-1	Energy consumption	Sustainability accounts	7, 8, 12, 13	
304-1	Operational sites in, or adjacent to, protected areas	Sustainability accounts	15	
305-1	Direct (Scope 1) GHG emissions	Sustainability accounts	13, 15	
305-2	Energy indirect (Scope 2) GHG emissions	Sustainability accounts	13, 15	
305-3	Other indirect (Scope 3) GHG emissions	Sustainability accounts	12, 13, 15	
305-4	GHG emissions intensity	Sustainability accounts	13, 15	
306-3	Waste generated	Sustainability accounts	12, 15	
306-4	Waste diverted from disposal	Sustainability accounts	12, 15	
306-5	Waste directed to disposal	Sustainability accounts	15	
308-1	New suppliers that were screened using environmental criteria	Sustainability report, our social contributions	8, 12	Proportion not calculated



GRI-disclosure	Description	Reporting	UN SDGs <sup>1)</sup>	Omissions
<b>SOCIAL DISCLOSURES</b>				
403-8	Workers covered by an occupational health and safety management system	All workers at Statnett SF	8	
403-9	Work-related injuries	Sustainability report, Our social contributions and Sustainability accounts	8	
405-1	Diversity of governance bodies and employees	Sustainability accounts	5	
406-1	Incidents of discrimination and corrective actions taken	Sustainability report, Our contributions to sustainable economic growth and Sustainability accounts	8	
409-1	Measures taken to contribute to the elimination of forced or compulsory labor	Sustainability report, Our social contributions	8	
413-1	Operations with local community engagement, impact assessments, and development programs	Sustainability report, Our contributions to sustainable economic growth	16	Limited to qualitative information
414-1	New suppliers that were screened using social criteria	Sustainability report, Our social contributions	8, 16	Proportion not calculated
419-1	Non-compliance with laws and regulations in the social and economic area	Sustainability accounts	16	
<b>SECTOR SPECIFIC INDICATORS</b>				
EU3	Number of customers	Statnett has 69 customers in the transmission grid. The customers are divided into three categories; distribution grid companies, power producers and industrial customers (outlets over 15 MW).	7	
EU4	Length of above and underground transmission lines	Annual report, This is Statnett	7, 9	
EU12	Transmission losses as a percentage of total energy	Sustainability accounts	7, 13	
EU25	Number of injuries and fatalities	Sustainability accounts	8	
EU28	Power outage frequency	Annual report, This is Statnett	7, 9	

<sup>1)</sup>Refer to those of the UN SDG's that we consider to be most relevant to Statnett's activities.



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To the Board of Directors of Statnett SF

## INDEPENDENT AUDITOR'S ASSURANCE REPORT ON STATNETT'S SUSTAINABILITY REPORT FOR 2021

We have been engaged by the Board of Directors of Statnett to provide limited assurance in respect of the sustainability information in Statnett Sustainability Report 2021 ("the Report"), included in the Statnett Annual Report 2021. Our responsibility is to provide a limited level of assurance on the subject matters concluded on below.

### Responsibilities of the Board of Directors

The Board of Directors is responsible for the preparation and presentation of the Report and that it has been prepared in accordance with the GRI Standards, level Core, and other reporting criteria described in the Report. The Board of Directors is also responsible for establishing such internal controls that they determine are necessary to ensure that the information is free from material misstatement, whether due to fraud or error.

### Auditor's responsibilities

Our responsibility is to express a limited assurance conclusion on the information in the Report. We have conducted our work in accordance with ISAE 3000 (Revised) Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board.

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

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Considering the risk of material misstatement, our work included analytical procedures and interviews with management and individuals responsible for sustainability management, as well as a review on a sample basis of evidence supporting the information in the Report.

We believe that our work provides an appropriate basis for us to provide a conclusion with a limited level of assurance on the subject matters.

**Conclusions**

Based on our work, nothing has come to our attention causing us not to believe that:

- Statnett has established management processes and systems to manage material aspects related to sustainability, as described in the Report.
- Statnett has applied procedures to identify, collect, compile and validate information for 2021 to be included in the Report, as described in the Report. Information presented for 2021 is consistent with data accumulated as a result of these procedures and appropriately presented in the Report.
- Statnett applies a reporting practice for its sustainability reporting aligned with the Global Reporting Initiative (GRI) Standards reporting principles and the reporting fulfils level Core according to the GRI Standards. Statnett's GRI Index 2021 presented in the Report appropriately reflects where information on each of the disclosures of the GRI Standards is to be found within the Statnett Annual Report 2021.

Oslo, 24 March 2022

Deloitte AS

**Guro Magnetun Heimvik**

State Authorised Public Accountant

**Frank Dahl**

Sustainability expert

Note: Translation has been made for information purposes only.



# Sustainability accounts

We have collected detailed information on the three main categories described in the Sustainability report.

## Information on social conditions

### Safety

Serious Incident Frequency SIF	2021		2020		2019	
	Number	SIF value	Number	SIF value	Number	SIF value
Total	10	2,3	29	6,2	15	2,9

Lost-time injuries (LTIF)	Number of injuries	LTIF value	Number of injuries	LTIF value	Number of injuries	LTIF value
Employees	3	1,0	4	1,5	6	2,3
Subcontractors	6	4,0	13	6,6	16	6,2
Total	9	2,0	17	3,6	22	4,2

Injuries (TRIF)	Number of injuries	TRIF value	Number of injuries	TRIF value	Number of injuries	TRIF value
Employees	7	2,4	12	4,4	15	5,7
Subcontractors	19	12,7	23	11,7	34	13,2
Total	26	5,9	35	7,5	49	9,4

Fatalities	2021		2020		2019	
Employees	0		0		0	
Subcontractors	0		1		0	

Lost day rate (LDR)	Number of lost days	LDR value	Number of lost days	LDR value	Number of lost days	LDR value
Employees	90	31	67	24	62	23
Subcontractors	167	112	258	131	155	60
Total	257	58	325	70	217	42

Total recordable injuries (TRIF) and lost-time injuries (LTIF) are not differentiated by gender or region. The lost-time injuries frequency (LTIF) shows the frequency of work-related lost-time injuries per million working hours. The total recordable injury frequency (TRIF) shows the total number of work-related injuries per million working hours. The serious incident frequency (SIF) indicator captures the most serious incidents/conditions involving injuries, near misses, environmental harm and recorded hazardous conditions per million working hours relating to electrical safety and working at height. Absence days are defined as lost working days in relation to the total number of working days the injured person is away from the first day after the work injury occurred. Lost day rate shows the absence rate or the frequency of absence due to the work injury per million hours worked. A fatal accident is considered as 230 days absence. Differences in results between employees and subcontractors can be explained by the fact that the contractors work operationally, while the employees also includes administrative positions.

Sanctions, health and safety	Unit	2020	2019	2018
Cases where legal or administrative sanctions have been issued for serious breaches of health and safety legislation	Number	0	0	0
Fines or charges for serious breaches of health and safety legislation	MNOK	0	0	0

## Supply chain

Payment to suppliers <sup>1)</sup>	2021		2020		2019	
	MNOK	Number of suppliers	MNOK	Number of suppliers	MNOK	Number of suppliers
Development and operation	4 215	948	5638	982	5666	842
IT	1 113	445	1072	428	903	440
Administrativt	470	2390	463	2313	490	2463
Consultants	718	438	982	397	733	332
Other	764	1133	514	1338	2105	1471
Totalt (unique suppliers)	7 280	4597	8669	4382	9898	4403

1) Payments are categorized by procurement categories. IT includes IT-consultants.

## Decent working life

Trade unions	Unit	2021	2020	2019
Percentage of employees with collective agreements as at 31.12	%	84	78	80

Penal sanctions, human rights	Unit	2021	2020	2019
Cases where legal or administrative sanctions have been issued for material breaches of human rights legislation <sup>1)</sup>	Number	0	0	0
Fines or charges for material breaches of human rights legislation	MNOK	0	0	0

<sup>1)</sup> Material legal sanctions for discrimination, forced labour, child labour or breaches of freedom of association, indigenous rights or employee rights.

## Working environment

Employees	Unit	2021	2020	2019
Employees as at 31 Dec	Number	1594	1530	1445
Employees in subsidiaries as at 31 Dec <sup>1)</sup>	Number	53	46	48
Employees in full-time positions as at 31 Dec	%	98,9	98,6	98,8
Turnover	%	4,0	2,3	4,7
Apprentices as at 31 Dec	Number	30	28	30
Trainees as at 31 Dec	Number	11	9	10

Age distribution	Unit	2021	2020	2019
Employees under 30	%	6,7	8,0	8,3
Employees aged 30–50	%	47,6	47,2	47,2
Employees over 50	%	45,7	44,8	44,5
Average age, all employees	Years	47,4	46,9	46,8
Average age, men	Years	47,9	47,4	47,3
Average age, women	Years	45,8	45,4	45,3

Gender equality	Unit	2021	2020	2019
Female quota, Group	%	26,6	26,8	26,2
Female quota, management positions	%	29,5	24,7	25,9
Female quota, Group Management	%	50,0	28,6	28,6
Female quota, Board of Directors	%	44,4	44,4	37,5
Female quota, new employees	%	34,4	36,7	26,6
Female quota, new managers	%	57,9	28,7	25,3
Female quota, full-time employees	%	26,2	26,1	25,3
Female quota, part-time employees	%	53,8	68,1	75,0

Equal pay <sup>2)</sup>	Unit	2021	2020	2019
Average salary for women as a percentage of average salary for all employees	%	99,6	99,0	99,4
Average salary for men as a percentage of average salary for all employees	%	100,1	100,4	100,2
Average salary for female managers as a percentage of average salary for all managers	%	101,0	100,5	101,8
Average salary for male managers as a percentage of average salary for all managers	%	99,7	99,8	99,4



Employees by group	Number of women	percentage women	average age women	Number of men	Percentage men	Average age men	Total number	Total average age	Average salary for women per cent in relation to average salary for all employees	Average salary for men per cent in relation to average salary for all employees
1	20	29,4	42,9	48	70,6	27,6	68	32,1	113,1	94,5
2	31	9,5	48,1	296	90,5	43,7	327	44,1	96,7	100,3
3	289	29,8	42,8	680	70,2	48,2	969	46,6	93,3	102,8
4	86	31,9	52,0	184	68,1	54,1	270	53,4	96,9	101,4
<b>Total</b>	<b>426</b>	<b>26,1</b>	<b>45,1</b>	<b>1 208</b>	<b>73,9</b>	<b>47,2</b>	<b>1 634</b>	<b>46,6</b>	<b>99,5</b>	<b>100,2</b>

Sickness absence	Unit	2021	2020	2019
Short term, 1–16 days	%	1,1	1,1	1,4
Long term (>16 days)	%	1,8	1,7	1,5
Women	%	3,8	3,7	4,5
Men	%	2,7	2,4	2,5
Totalt	%	3,0	2,8	2,9

Statnett as employer	Unit	2021	2020	2019
Employee satisfaction and motivation				
Employee engagement <sup>3)</sup>	Scale of 1-5	-	-	4,2
Response rate	%	-	-	89
Employees who have had an annual appraisal	%	82	82	81

<sup>1)</sup> Elhub

<sup>2)</sup> Reported for the first time in 2019; not all historical figures are available.

<sup>3)</sup> From Statnett's annual internal organisation survey. Replaced with two work environment surveys in 2020.

## Environmental and climate information

### Environment

Form of protection	2021			2020		
	Number of protected areas	Kilometres of power lines	Areal (km2)	Number of protected areas	Kilometres of power lines	Areal (km2)
Biotope protection under the Norwegian Wildlife Act	4	85	6	4	85	6
Animal protection area	11	44	3	11	44	3
Landscape protection area	14	141	14	14	141	11
National Park	0	0	0	0	0	0
Nature reserve	70	123	2	68	120	8
Protected plant area	0	0	0	0	0	0
<b>Total</b>	<b>99</b>	<b>393</b>	<b>25</b>	<b>97</b>	<b>390</b>	<b>28</b>

Waste type <sup>1)</sup>	Unit	2 021	2020	2019
Biological waste and sludge	tonnes	4 229	2 495	2 646
Paper and cardboard	tonnes	20	33	69
Glass	tonnes	7	1	5
Metals	tonnes	6 812	3 151	556
WEEE	tonnes	257	261	551
Soil and inorganic materials	tonnes	33 083	315	1 193
Plastics	tonnes	10	28	46
Chemicals	tonnes	0	0	2
Batteries	tonnes	3	7	13
Hazardous waste	tonnes	375	359	103
Total source-separated waste	tonnes	44 797	6 648	5 183
Mixed waste	tonnes	473	701	674
Source separation rate	per cent	89	89	87
Estimated reported	per cent	85	85	85

<sup>1)</sup> Statnett classifies waste in accordance to NS9431

Sanctions, environment	Unit	2021	2020	2019
Cases where legal or administrative sanctions have been issued for material breaches of environmental legislation	Number	0	1	0
Fines or charges for breaches of environmental legislation	MNOK	0	0,6	0

Environmental incidents	Unit	2021	2020	2019
Statnett				
Serious environmental incidents <sup>1)</sup>	Number	2	1	1
Less serious environmental incidents <sup>2)</sup>	Number	1	2	17
Contractors				
Serious environmental incidents	Number	1	4	0
Less serious environmental incidents	Number	7	7	11
Total	Number	11	14	29

1) Incidents that cause serious or irreversible environmental impacts.

2) Incidents that cause minor or moderate negative environmental impacts.

## Climate

Energy consumption	Unit	2021	2020	2019
Electricity				
Own consumption	GWh	24,3	20,4	17,1
Grid losses	GWh	2 609	2 336	2 238
Grid losses as percentage of power transported in the transmission grid	%	2,4	2,3	2,4
Fossil fuels				
Natural gas, gas-powered plants	Ton	82	5	23
Fuel, own cars and machinery	m <sup>3</sup>	970	892	934
Fuel, business car travel	m <sup>3</sup>	29	37	48
Fuel, Statnett Transport	m <sup>3</sup>	1 295	1 395	586
Fuel, own helicopter use	m <sup>3</sup>	297	297	308
District heating and cooling				
Own consumption	MWh	2 663	2 545	2 441
Of which renewable	%	99	82	67



Emission intensity	Unit	2021	2020	2019
Total greenhouse gas emissions	tCO <sub>2</sub>	37 001	60 929	61 292
Total power transmission in the main grid	TWh	109	101	95
<b>GHG emission intensity</b>	tCO <sub>2</sub> /TWh	341	602	644

Greenhouse gas emissions <sup>1)</sup>	Unit	2021	2020	2019
<b>Direct emissions (scope 1)</b>	tCO <sub>2</sub> equivalents	<b>13 450</b>	<b>18 141</b>	<b>13 159</b>
From fuel consumption <sup>2)</sup>	tCO <sub>2</sub> equivalents	2 024	2 215	2 205
From company car travel <sup>3)</sup>	tCO <sub>2</sub> equivalents	64	84	108
From helicopter use (Statnett) <sup>4)</sup>	tCO <sub>2</sub> equivalents	730	754	781
From fugitive emissions (SF6) <sup>5)</sup>	tCO <sub>2</sub> equivalents	6 788	11 203	8 389
Fra Statnett Transport	tCO <sub>2</sub> equivalents	3 618	3 871	1 612
From reserve power facilities (natural gas)	tCO <sub>2</sub> equivalents	226	14	63
<b>Indirect emissions (scope 2)<sup>6)</sup></b>	tCO <sub>2</sub> equivalents	<b>21 068</b>	<b>40 067</b>	<b>42 638</b>
Electricity	tCO <sub>2</sub> equivalents	195	347	323
Grid losses	tCO <sub>2</sub> equivalents	20 872	39 712	42 298
District heating and cooling <sup>7)</sup>	tCO <sub>2</sub> equivalents	1	8	17
<b>Other indirect emissions (scope 3)</b>	tCO <sub>2</sub> equivalents	<b>2 484</b>	<b>2 721</b>	<b>5 495</b>
From company air travel <sup>8)</sup>	tCO <sub>2</sub> equivalents	569	824	2 685
From helicopter use <sup>4)</sup>	tCO <sub>2</sub> equivalents	1 915	1 897	2 811
<b>Total emissions</b>	tCO <sub>2</sub> equivalents	<b>37 002</b>	<b>60 929</b>	<b>61 292</b>

<sup>1)</sup> Greenhouse gas emissions relate to Statnett, with the exception of helicopters (contractors). Consolidation is based on operational control. The figures in the table have been calculated in accordance with the GHG protocol and show emissions using the location-based method of calculation. In 2020, total scope 2 emissions using the market-based method, which corrects for sales of guarantees of origin, amounted to 933 317 tonnes of CO<sub>2</sub> (emission factor per NVE equates to 396 tonnes CO<sub>2</sub>/GWh).

<sup>2)</sup> Emission factor: SSB Sales of petroleum products and gov.uk Greenhouse gas reporting

<sup>3)</sup> Emission factor: OFV AS

<sup>4)</sup> Emission factor JET A-1 (Kerosene): Asplan Viak report "Notodden airport - GHG emissions". The emissions for helicopter use are based on estimated average hourly usage per kilometer line section, which means there is some uncertainty in the numbers.

<sup>5)</sup> Emission factor: United Nation GWP potential, GWP 23,900

<sup>6)</sup> Emission factor: NVE electricity disclosure 2019

<sup>7)</sup> Source: Avantor. A larger proportion of Statnett's buildings that use district heating and cooling have been included in 2019. Figures for previous years have been restated using the new method.

<sup>8)</sup> Source: Via Egencia. A new method (Defra) was introduced in 2019 for calculating greenhouse gas emissions from flights. Figures for 2018 have been restated using the new method.

Levels and emissions, SF <sub>6</sub>	Unit	2021	2020	2019
Levels as of 31 Dec <sup>1)</sup>	kg	175 199	148 343	129 281
SF6 emissions	kg	284	469	353
Substations with gaseous components	Number	178	172	141
Of which gas-insulated substations	Number	35	31	30

<sup>1)</sup> Levels include SF6 in stations and stock.

## Sustainable economic information

### Business ethics and anti-corruption

Whistle-blowing cases		Unit	2021	2020	2019
Total number of concerns reported		Number	58	55	52
Of which linked to business ethics and anti-corruption <sup>1)</sup>		Number	28	26	22
Of which linked to working environment <sup>2)</sup>		Number	30	29	30
Sanctions, business ethics and anti-corruption			2021	2020	2019
Cases where legal or administrative sanctions have been issued for material breaches of business ethics legislation <sup>3)</sup>		Number	0	0	0
Fines or charges for material breaches of business ethics legislation		MNOK	0	0	0

<sup>1)</sup> Concerns linked to business relationship, for example work-related crime and impartiality

<sup>2)</sup> Concerns linked to employees, for example conflicts of interest and discrimination.

<sup>3)</sup> Material legal sanctions for accounting fraud, corruption.