

This index has been prepared in reference to the [Global Reporting Initiative's \(GRI\) Standards](#) in order to report significant economic, environmental, and social topics within the business. All information below, unless noted otherwise is for the TDS Enterprise (TDS, TDS Telecom, USCellular, and OneNeck IT Solutions).

Inclusion of information in this index should not be construed as a characterization of the materiality or financial impact of that information. All data is for the year ended December 31, 2020. Please see Telephone and Data Systems, Inc. (TDS) [Form 10-K](#) for the year ended 2020, and other information available on the TDS Sustainability website.

Disclosure	Disclosure Title	2020 Response
GRI 102:	General Disclosures	
102-1	Name of organization	Telephone and Data Systems, Inc.
102-2	Activities, brands, products, and services	10-K Our Businesses
102-3	Location of headquarters	10-K
102-4	Location of operations	10-K Our Businesses
102-5	Ownership and legal form	10-K
102-6	Markets served	10-K USCellular Coverage Map TDS Telecom Company Profile OneNeck IT Solutions
102-7	Scale of the organization	10-K
102-8	Information on employees and other workers	10-K TDS had approximately 9,200 full time and part time employees as of December 31, 2020.
102-9	Supply chain	Supplier Diversity at USCellular TDS Culture
102-10	Significant changes to the organization and its supply chain	There have been no significant changes to the organization and supply chain in 2020.
102-11	Precautionary principle or approach	10-K TDS Proxy
102-14	Statement from senior decision-maker	"At TDS, we believe that being a good corporate citizen is fundamental to our long-term success. Truly caring about our customers, our employees and associates, striving to enhance the lives of those in our communities and serving as stewards of the environment will drive the performance of our business to benefit our shareholders and debtholders over time." - LeRoy T. Carlson Jr., President and CEO - TDS
102-15	Key impacts, risks, and opportunities	10-K
102-16	Values, principles, standards, and norms of behavior	TDS Code of Conduct USCellular Code of Conduct
102-17	Mechanisms for advice and concerns about ethics	TDS Ethics Hotline USCellular Ethics Hotline
102-18	Governance structure	TDS Governance TDS Proxy TDS Governance Documents USCellular Proxy USCellular Governance Documents
102-20	Executive-level responsibility for economic, environmental, and social topics	ESG Steering Committee ESG Steering Committee Charter
102-22	Composition of the highest governance body and its committees	TDS Proxy
102-23	Chair of the highest governance body	Walter C. D. Carlson serves as Chairman of the board TDS Proxy
102-25	Conflicts of interest	TDS Proxy Code of Business Conduct USCellular Code of Business Conduct
102-32	Highest governance body's role in sustainability reporting	ESG Steering Committee ESG Steering Committee Charter
102-35	Remuneration policies	TDS Board Committees and Charters TDS Proxy
102-36	Process for determining remuneration	TDS Board Committees and Charters TDS Proxy
102-45	Entities included in the consolidated financial statements	10-K
102-49	Changes in reporting	There have been no significant changes in reporting in 2020. 10-K
102-50	Reporting period	Jan 1, 2020 – Dec 31, 2020
102-51	Date of most recent report	Dec 30, 2020
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Alexandra Rossen – ESG Specialist, alexandra.rossen@tdsinc.com
102-54	Claims of reporting in accordance with the GRI standards	See top of index.
102-56	External assurance	We are continuing to evaluate whether we will engage third-party assurance. The information currently provided is validated and assured through a review by our internal audit and accounting functions, investor relations, as well as TDS' external legal firm.
GRI 201:	Economic Performance	
201-1	Direct economic value generated and distributed	TDS directly distributes economic value to its shareholders through the payment of dividends and repurchases of its common stock.
201-2	Financial implications and other risks and opportunities due to climate change	TDS believes it has minimal direct business risk exposure to climate change. The financial risk to the company primarily related to the frequency and severity of weather events where the company offers services.
201-3	Defined benefit plan obligations and other retirement plans	TDS sponsors a defined contribution pension plan along with a defined benefit postretirement plan that provides medical benefits to certain retirees.
201-4	Financial assistance received from government	TDS Telecom receives Federal and State USF (Universal Service Fund) support, including support from the FCC's A-CAM program. USCellular also receives support from the FCC's USF programs that are designed so that Americans have more equal access to communication services, especially remote rural communities where it is more expensive to serve. A-CAM
GRI 203:	Indirect Economic Impacts	
203-1	Infrastructure investments and services supported	USCellular and TDS Telecom, in an effort to bridge the digital divide, are both investing heavily and bringing advanced communication technologies to the communities they serve. Since its founding in 1969, TDS has focused on serving rural and suburban markets, which have tended to be underserved due to their rural locations. TDS Telecom is making significant investments in fiber inside and out of its footprint. Fiber promises faster speeds and better reliability. In addition, the A-CAM program is enabling TDS Telecom to improve internet speeds in some of the hardest to reach areas of TDS Telecom's serving area. Additionally, USCellular's network modernization program and deployment of 5G technology is expected to address customers' growing demand for data services as well as opportunities for new services requiring high speed reliability and low latency. And importantly, USCellular expects to leverage the technology to better serve rural customers and connect them to education, healthcare and entertainment solutions.
GRI 204:	Procurement Practices	
204-1	Proportion of spending on local suppliers	TDS selects suppliers based on price, quality and timeliness. Where appropriate, preference is given to suppliers located in the areas we conduct business. TDS Code of Conduct USCellular selects suppliers based on price, quality and timeliness. Where appropriate, preference is given to suppliers located in the areas we conduct business and to TDS' business units that submit closely competitive bids. USCellular Code of Business Conduct Supplier Diversity at USCellular
GRI 205:	Anti-corruption	
205-1	Operations assessed for risks related to corruption	We want our customers, suppliers and others to know the high standards which we operate. Our Code of Business Conduct provides the guiding principles by which we conduct all of our business activities. Additionally, we have a robust anti-fraud program for the prevention and deterrence of fraud and timely detection to mitigate the impact of any fraud that occurs.
205-2	Communication and training about anti-corruption policies and procedures	The company maintains a Fraud Awareness & Ethics Resource Center on its intranet site for employees to continually promote fraud and ethics awareness throughout the Enterprise by providing valuable fraud and ethics resources. Additionally, there is mandatory fraud awareness training annually for all associates across the enterprise. The company also maintains an anonymous Ethics notification program that can be accessed by telephone or the internet.
GRI 207:	Tax	
207-1	Approach to tax	Proactively deliver timely, accurate, ethical and business focused tax solutions and minimize the financial impact of taxes.
207-4	Country-by-country reporting	TDS' operations are domestic - only a U.S. taxpayer
GRI 302:	Energy	
302-1	Energy consumption within the organization	The TDS Enterprise (USCellular, TDS Telecom, TDS Corporate, OneNeck IT Solutions) consumed 2.0 GJ of energy consisting of electricity, natural gas, diesel and fuel oil. Gasoline consumption is not included in the calculation.
GRI 306:	Waste	
306-2	Management of significant waste-related impacts	USCellular requires its device recycling and salvage vendors to be R2 certified. In addition, it requires buyers of its devices to have an ISO 14001 certified environmental management system. TDS Telecom manages much of its e-waste through third party vendors which properly dispose, reuse and recycle the waste.
306-4	Waste diverted from disposal	USCellular has a robust system for asset management and battery recycling. USCellular's wireless devices are recovered through its store, direct fulfillment, and through a Trade-In program. Devices recovered through Take Back: • Reused or Sold 95% • Recycled 5% • Land-filled 0% In total, USCellular had over 389,500 devices which helped divert over 177,400 pounds of harmful solid waste from the landfill and avoided over 496,626,500 gallons of water pollution. USCellular has also properly disposed of 4,035,352 pounds of lead bearing batteries in 2020. Since 2012, TDS Telecom has properly recycled over 2.5 million pounds of telecom network equipment.
GRI 401:	Employment	
401-1	New employee hires and employee turnover	For the year 2020, The TDS Enterprise had: • 1,682 new hires • 1,701 Terminations Turnover rate: 15% (end of year 12 month rolling average, includes voluntary and involuntary)
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	TDS Careers USCellular Benefits TDS Telecom Benefits
401-3	Parental leave	At USCellular, 99 men and 74 women (for a total of 173 employees) took paid parental leave (PPL) in 2020. 92% of men and 82% of women that took PPL returned to work for an average of 88%. At TDS Telecom, 32 men and 14 women (for a total of 46 employees) took paid parental leave (PPL) in 2020. 100% of the employees that took PPL returned to work.
GRI 403:	Occupational Health and Safety	
403-1	Occupational health and safety management system	USCellular is committed to protecting the health, safety and environment of our associates, customers and citizens in communities where we conduct business. USCellular's goal is to reduce injuries to associates, to lower environmental risks and to increase efficiency in the use of natural resources. USCellular has a health and safety management system consisting of 28 programs based on recognized risk. USCellular's Environmental Health & Safety (EHS) group is responsible for the company tracking and reporting for all OSHA and EPA codes compliance. They also guide the company's efforts to address any identified risks and prevent injuries. TDS Telecom recognizes the importance of providing employees with a safe and healthy work environment, free from recognized hazards, and conducting business in the safest manner possible. TDS Telecom takes the matter of safety very seriously and expects each employee to actively promote safety and accident prevention daily, and integrate the tools and training provided into their job functions.
403-2	Hazard identification, risk assessment, and incident investigation	USCellular utilizes investigation processes to determine a root cause and corrective action for incidents. The EHS team reviews and tracks all incidents to look for trends and systematic issues. Employees communicate with their safety committees about potential hazards, safety questions and inquiries, then the committees assess each situation and EHS proposes preventive measures. As COVID-19 has posed a risk to our associates and customers, USCellular has taken steps to minimize potential exposure through distribution of PPE, remote working arrangements and careful monitoring of our evolving operations. TDS Telecom's Environmental Health and Safety team has processes in place to identify and assess risks. These include an accident reporting process, emergency action plans and emergency guides. TDS Telecom also added additional guidelines due to the COVID-19 global pandemic including distribution of PPE, remote work requirements (if possible for the position) and a self-health assessment for associates who are not able to work remotely.
403-4	Worker participation, consultation, and communication on occupational health and safety	USCellular's EHS team is responsible for developing and maintaining the written Safety Committee Program, based on input from the safety committees. The purpose of the safety committee is to bring associates and leaders together in a non-adversarial cooperative effort to promote safety and health in each workplace. USCellular has a COVID-19 website for frontline communications, information and benefits updates as well as additional resources and FAQs for associates to access at all times. TDS Telecom is committed to providing a safe and healthy workplace for all its workers and customers and that requires full cooperation among our employees, leadership team and customers. Through this cooperative effort, TDS Telecom is able to establish and maintain the safety and health of our workers and workplaces. TDS Telecom has a dedicated safety site and COVID work for employee communications, instructions, guidelines, policies and resources. The company is continually sending company-wide emails about significant changes and updates related to policy, compliance, expectations, best practices, etc. TDS Telecom also has a safety mailbox for concerns, issues, and suggestions as well as safety training classes for field employees, development of safety training videos.
403-5	Worker training on occupational health and safety	All USCellular EHS administered training requirements are included in the Learning Management System, including job specific training. This includes First Aid/CPR/AED training, respirator training, asbestos awareness, fire extinguisher, and spill prevention, containment & countermeasure training among others. TDS Telecom's Safety Handbook includes 11 different sections, covering a wide range of training. This includes topics on personal safety, PPE, fall protection, confined space entry, vehicle safety, hazard communication, fire safety/suppression, electrical safety, tools, air & machines, office safety, and accident management.
GRI 404:	Training and Education	
404-1	Average hours of training per year per employee	At USCellular, each associate completes about 20 hours of training based on internal learning management system data. External development is currently not tracked. At TDS Telecom, the average hours of training per year per employee is 23 hours.
404-3	Percentage of employees receiving regular performance and career development reviews	At USCellular, all employees receive regular performance and career development reviews. At TDS Telecom, all employees receive regular performance, year-end, and career development reviews.
GRI 405:	Diversity and Equal Opportunity	
405-1	Diversity of governance bodies and employees	For the TDS Enterprise (USCellular, TDS Telecom, TDS Corporate and OneNeck IT Solutions): Female: 38% Male: 62% Minority/PoC: 22% Veteran: 6% Disabled: 5% Diversity of governance bodies: TDS Governance
GRI 413:	Local Communities	
413-1	Operations with local community engagement, impact assessments, and development programs	TDS Communities USCellular Community Outreach TDS Telecom Community Involvement
GRI 414:	Supplier Social Assessment	
414-1	New suppliers that were screened using social criteria	USCellular includes questions regarding social criteria in our Request for Proposal (RFP) process. The RFP template has a series of questions about the suppliers' sustainability management & environmental practices along with social responsibility and community efforts. USCellular Suppliers
GRI 415:	Public Policy	
415-1	Political contributions	TDS Code of Conduct
GRI 418:	Customer Privacy	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	USCellular and TDS Telecom do not publicly disclose this information. However, both companies are in compliance with the FCC reporting requirements and other reporting agencies. The TDS information security program aligns with independent, industry standard cybersecurity frameworks. Formal risk assessments are conducted annually leveraging these standards. The assessment results are used to drive continuous improvement in the TDS cybersecurity control environment. The cybersecurity risk program is reported to the TDS Board of Directors. TDS assesses the threat and vulnerability landscape using various commercial, government, vendor and publicly available information sources and tools. TDS manages these evolving risks through ongoing investments in the security program. TDS Privacy Policy USCellular Privacy Policy TDS Telecom Privacy Policy USCellular Transparency Report
GRI 419:	Socioeconomic Compliance	
419-1	Non-compliance with laws and regulations in the social and economic area	The TDS enterprise discloses all significant legal proceedings in its SEC reports. In 2020, we did not disclose any legal proceedings in the social and economic area.