

Stockholm, May 27th, 2024.

Dear suppliers,

At Telia Company AB, our commitment to ethical sourcing extends beyond mere words. From strategy to execution, we rigorously assess our suppliers' practices, ensuring they align with our values of integrity, social responsibility, and sustainability. Our Supplier Code of Conduct (Supplier Code) is the foundation which we stand on in our work with responsible sourcing – a manifestation of our promise to operate ethically, responsibly, and lawfully – ensuring every interaction contributes positively to our global community.

Telia's Supplier Code encourages us to dare to go beyond regulation and make impactful decisions, to care for individuals, society, and the planet, and to simplify our ways of working with suppliers to focus on what truly matters.

We require, and expect our suppliers to understand, embrace, and implement our Supplier Code within their operations and supply chain. Compliance with this code is not optional; it is a fundamental element of our partnerships, promoting fruitful business relationships based on mutual respect, and shared values.

We promote open communication and transparency, encouraging third-parties in our supply chain to report any concerns or violations of this Supplier Code. By fostering a culture of accountability and collaboration, we believe that together, we can achieve excellence in every aspect of our business, ensuring a positive impact on both society and the environment.

Thank you for your commitment to this crucial matter and for your continued partnership.

Warm regards,

Patrick Hofbauer
President & CEO
Telia Company AB



Owner
Chief Financial Officer**Date**
2024-05-27
Approved by
Chief Executive Officer**Page**
1 (26)
Version
5.0

Table of Contents

1 Introduction	2
1.1 Foundation	2
1.2 Scope.....	2
2 Requirements.....	3
2.1 General Requirements	3
2.1.1 Compliance.....	3
2.1.2 Responsible Operations and Risk Management.....	3
2.1.3 Privacy and Data Protection.....	4
2.1.4 Security.....	4
2.1.5 Responsible Artificial Intelligence (AI)	4
2.2 Social Requirements	5
2.2.1 Human Rights	5
2.2.2 Responsible Sourcing of Minerals	7
2.2.3 Labor Rights	7
2.2.4 Health and Safety	8
2.3 Environmental Requirements	9
2.3.1 General Environmental Requirements	9
2.3.2 Climate Change	10
2.3.3 Resource Use and Circularity.....	10
2.3.4 Hazardous Substances	11
2.4 Business Ethics Requirements.....	11
2.4.1 Anti-Bribery and Corruption.....	11
2.4.2 Trade Sanctions and Export Control	11
2.4.3 Conflicts of Interest and Transparency	12
2.4.4 Fair Competition.....	12
3 Implementation and Accountability	12
3.1 Reporting and Communication	12
3.2 Compliance Verification.....	12
3.3 Termination	13
4 Definitions	14
5 Appendix.....	15

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
2 (26)
Version
5.0

1 Introduction

Telia Company AB and its affiliates (hereafter referred to as "Telia") are committed to integrity, ethics, and sustainability. This commitment includes actively preventing severe adverse impacts such as forced labor, child labor, life-threatening risks, environmental harm, corruption, and attacks on environmental and human rights defenders.

1.1 Foundation

Upholding these values, and in line with international guidelines, Telia requires its suppliers to adhere to its Supplier Code of Conduct (referred to as the "Supplier Code"). This code reflects Telia's commitments outlined in various international guidelines, such as:

- The UN Universal Declaration of Human Rights;
- The UN Guiding Principles on Business and Human Rights;
- The Core Conventions of the International Labor Organization (ILO);
- The OECD Guidelines for Multinational Enterprises;
- The UN Global Compact;
- The Children's Rights and Business Principles;
- The 1.5°C Ambition Expressed in the Paris Agreement;
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

These guidelines form the foundation of the internal Telia code of conduct which is approved by the Board of Telia. The requirements set by the Telia code of conduct, which go beyond legal compliance and apply to all employees, lay out how to engage with stakeholders in a way that ensures the highest degree of ethical business practices and behavior.

1.2 Scope

This Supplier Code specifies requirements applicable to suppliers that conduct business with, or on behalf of, Telia. The term "supplier," for this document's purposes, encompasses suppliers and other third parties, including but not limited to their Employees, subsidiaries, agents, affiliates, subcontractors, and their suppliers directly involved in Telia deliverables.

In addition to the requirements set forth by the Supplier Code, we may include complimentary sustainability requirements in respective contracts depending on delivery to Telia.

Whenever "shall" is used, it indicates a minimum requirement that is necessary to be fulfilled.

Whenever "should" is used, it indicates requirements which are recommended to follow and the targets that we encourage all supplier to work towards.

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
3 (26)
Version
5.0

2 Requirements

In our dedication to maintaining high standards, Telia sets clear requirements for suppliers to ensure legal compliance, ethical conduct, sustainable principles, and responsible business practices across our supply chain.

2.1 General Requirements

Telia outlines foundational requirements guiding our partnership with suppliers, promoting transparency and responsible practices in our collaborations.

2.1.1 Compliance

Supplier shall:

- a. Comply with all regulatory requirements, including but not limited to applicable laws, rules, regulations and treaties and the requirements set out in this Supplier Code, and conduct relevant reporting (see 3.1 Reporting and Communication). Compliance with the requirements set forth in this Supplier Code is mandatory, even when these requirements stipulate higher standards than those required by regulatory requirements;
- b. Enforce and verify compliance with regulatory requirements and compliance with this Supplier Code within its own operations and reflect the content of the Supplier Code in its agreements with its subcontractors;
- c. Have an effective communication and training program for managers and Employees about the topics which it commits to in this Supplier Code;
- d. Maintain documentation and records to ensure compliance and conformity with this Supplier Code.

2.1.2 Responsible Operations and Risk Management

Suppliers are expected to maintain a robust due diligence process, alongside effective management systems and a grievance mechanism. This section elaborates on these essential components.

2.1.2.1 Due Diligence

Supplier shall:

Conduct comprehensive due diligence covering human rights, environmental impacts, and anti-corruption measures within its operations and value chains. This includes identifying, preventing, mitigating, accounting, and remediating potential adverse impacts.

The complexity of this due diligence shall align with the size of the business enterprise and the specific nature and context of its operations.

2.1.2.2 Management Systems

Supplier shall:

Owner
Chief Financial Officer**Date**
2024-05-27
Approved by
Chief Executive Officer**Page**
4 (26)
Version
5.0

Establish and maintain adequate management systems based on continuous improvements, that identify and mitigate legal, environmental, occupational health and safety, labor practice, and ethical risks. These systems align with internationally recognized standards (e.g., ISO 14001, ISO 45001, and ISO 37001) and relevant industry best practices, tailored to the supplier's size and nature. These systems must include:

- i. A comprehensive risk assessment to identify and address material risks through adequate control measures, including procedures and instructions;
- ii. A publicly available policy outlining commitments and guiding principles;
- iii. Periodic self-evaluations and audits to ensure compliance with the management systems;
- iv. Corrective action process to address identified deficiencies promptly.

2.1.2.3 Grievance Mechanism

Supplier shall:

- a. Maintain an effective and confidential grievance mechanism that allows all Employees, stakeholders, and affected parties to voice their concerns without fear of punishment or retaliation. This mechanism should be accessible and tailored to the nature and scale of the business;
- b. Record, review, and address all grievances raised. In cases where human rights violations are identified, including but not limited to issues such as child labor, prompt and effective remedial action is mandatory;
- c. Ensure that subcontractors and their suppliers directly involved in Telia deliverables are informed of these reporting channels.

2.1.3 Privacy and Data Protection

Supplier shall:

Respect everyone's right to privacy throughout its operations, and process any data, including personal data, in compliance with good data processing practices and applicable laws and regulations.

2.1.4 Security

Supplier shall:

- a. Have adequate information, physical and cybersecurity measures in place, addressing the risks, threats and vulnerabilities posed to them.
- b. Adhere to applicable information, physical and cybersecurity regulatory requirements and legislation, and follow established industry best practices.

2.1.5 Responsible Artificial Intelligence (AI)

Supplier shall:

- a. Follow responsible and ethical AI practices throughout all phases of AI design, implementation, testing, and usage. This includes, but is not limited to, respect for human rights, by ensuring fairness, diversity, and equality, as well as respect for accountability, transparency, safety, and security;

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
5 (26)
Version
5.0

- b. Be able to provide information about how it has embedded these principles into its AI practices. AI should be designed with having a human-in-control approach. Telia expects that Supplier is responsible for the AI solution it provides, unless agreed or legislated otherwise;
- c. Ensure that any data used to train AI systems is obtained and used in compliance with all applicable laws and regulations.

2.2 Social Requirements

Telia values social responsibility in our supply chain. We prioritize suppliers and partners committed to upholding human rights, fair labor practices, and inclusive workplaces, fostering positive impacts in our communities.

2.2.1 Human Rights

Telia safeguards human rights and expect our suppliers to do the same by adopting robust practices in the areas covered in this section.

2.2.1.1 Freedom of Expression

Supplier shall:

- a. Ensure that products, services, and business processes are constructed so that privacy and freedom of expression of individuals are respected;
- b. Not cause, or contribute to breach of, privacy or freedom of expression rights; nor retaliate against enjoyment of such rights;
- c. Respect the privacy rights of all individuals (Employees, customers, users, and other stakeholders) whenever the supplier gathers personal data or implements Employee monitoring practices.

2.2.1.2 Children's Rights

Supplier shall:

- a. Define anyone under the age of eighteen (18) as a child. Children under the minimum legal working age or fifteen (15) years old, as defined by national laws or the completion of compulsory education, whichever is higher, are strictly forbidden from involvement in any phase of business operations that exploits them and deprives them of their entitled schooling;
- b. Ensure that young Employees are not assigned to perform night shifts, overtime or any other work that is heavy, hazardous, or unsafe to their physical and mental health and development;
- c. Ensure that government-authorized job trainings or apprenticeship programs provide a minimum living wage and/or training;
- d. Have in place processes and remediation procedures, with the child's best interests in mind, in case of an encounter of a child working in conditions conflicting with these requirements;
- e. Ensure that its products and services are safe for children for their intended use;

Supplier should:

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
6 (26)
Version
5.0

- a. Support children's rights in all business activities and business relationships;
- b. Protect children online (for example through detecting and reporting child sexual abuse materials in workplace equipment) and contribute to building children's digital skills.

2.2.1.3 Modern Slavery and Forced Labor

Supplier shall:

- a. Take active measures to ensure no use of any form of slavery, forced, bonded, or indentured labor, or human trafficking, in any part of the value chain. This includes the use of employment bonds aiming to recover costs related to training or educational activities necessary for running normal business operations;
- b. Not restrict Employees to move freely or to leave the premises after completing their working hours;
- c. Acknowledge Employees' right to terminate their employment, provided they give reasonable notice;
- d. Not request the Employees to deposit money or equivalent and/or their original identification documents, nor to pay any recruitment or employment fees or costs.

2.2.1.4 Freedom of Association and Collective Bargaining

Supplier shall:

- a. Recognize Employees' right to freely form and to join, or not to join, trade unions or similar Employee representative organizations, and to collective bargaining. In situations where these rights are restricted by law, the supplier shall allow Employees to freely elect their representatives and the employer should engage and promote social dialogue;
- b. Not penalize, persecute, discriminate, or harass Employees when they join a trade union or act as Employee representative;
- c. Facilitate open communication between management and Employees to address concerns early, openly and on an informed basis.

2.2.1.5 Diversity, Fairness and Non-Discrimination

Supplier shall:

- a. Promote diversity, inclusion, and fairness for all Employees;
- b. Have zero tolerance towards discrimination in any employment practices on the grounds of ethnicity, gender, gender identity and expression, sexual orientation, marital status, social status, pregnancy or parental status, religious belief, political belief, nationality, disability, age, union affiliation or any other unfair discriminatory grounds;
- c. Not subject Employees to any mandatory health tests (e.g., pregnancy or HIV/AIDS) that have no relevance to the job function or related to workplace safety;
- d. Not tolerate nor support nor promote any form of physical contact that is sexual, coercive, threatening, abusive and exploitative, as well as psychological or verbal abuse, intimidation, threat, or harassment.

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
7 (26)
Version
5.0

Supplier should:

- a. Raise manager awareness of diversity, fair and equal treatment, equity of opportunity, through trainings;
- b. Strive to increase diversity (e.g., gender, ethnicity, age, disability);
- c. Perform worker dialogue, surveys, or other types of assessment to understand worker perceptions of their treatment;
- d. Regularly evaluate that the policies, processes, and code of conduct are free from bias and discrimination.

2.2.2 Responsible Sourcing of Minerals

As part of Telia's human rights agenda, in-scope suppliers, responsible for providing products containing tin, tantalum, tungsten, gold (together known as Conflict Minerals or 3TG metals), and cobalt, shall:

Adhere to the latest OECD 'Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas'; and implement at least the following measures:

- i. Establish written policies and procedures regarding the acquisition of Conflict Minerals;
- ii. Implement verifiable steps to ensure the exclusion of Conflict Minerals from supplied products;
- iii. Collaborate with subcontractors for traceability to the smelter level;
- iv. If required, complete a Conflict Minerals Reporting Template approved by Telia (such as from the 'Responsible Minerals Initiative'), with the aim of improving transparency about Conflict Minerals in the value chain.

2.2.3 Labor Rights

Labor rights, as a crucial component of responsible business, ensure fair treatment, dignity, and protection for workers, fostering sustainable and ethical practices through for example, employment agreements, working hours, wages etc.

2.2.3.1 Employment Agreement

Supplier shall:

- a. Provide individual or collective employment agreements in writing which have clear terms and conditions, specifying but not limited to working hours, overtime compensation, job description, notice period, salary, and frequency of payment;
- b. Ensure that Employees are informed about, and fully understand, their employment conditions and rights in their native languages or a language understandable to the Employee;
- c. Not contract Employees through schemes such as but not limited to consecutive short-term contracts or false apprenticeship, to avoid meeting obligations to Employees under applicable laws and regulations.

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
8 (26)
Version
5.0

2.2.3.2 Working Hours and Leave

Supplier shall:

- a. Define a normal workweek as not exceeding 48 hours;
- b. Ensure that Employees do not work overtime on regular basis and that overtime is voluntary and does not exceed on average 12 hours per week, unless otherwise regulated in collective bargaining agreements;
- c. Provide Employees at least one day off in every seven-day period and leaves, time off and holidays in accordance with applicable laws and regulations;
- d. Provide annual and parental leave (e.g., maternity, paternity) at the minimum in accordance with local law.

2.2.3.3 Wages and Benefits

Supplier shall:

- a. Provide all Employees a living wage sufficient to meet the basic needs of Employees and their family and when applicable, the salary shall be based on criteria set by collective bargaining agreements;
- b. Provide all Employees with timely payment and clear information regarding their wages and benefits for each pay period;
- c. Compensate overtime at a premium rate or as defined by national laws, collective bargaining agreement or industry standards;
- d. Not allow deductions from wages for disciplinary purposes or any other kind of financial punishment.

2.2.4 Health and Safety

Health and safety for our suppliers involves implementing measures to protect their workers' well-being, prevent accidents, and ensure compliance with safety regulations.

2.2.4.1 Occupational Health and Safety Management System

Supplier shall:

Have an occupational health and safety management system (OHSMS) in accordance with the requirements outlined in Section 2.1.2.2 Management Systems, using the Hierarchy of Controls.

2.2.4.2 Working and Living Conditions

Supplier shall:

- a. Ensure clean and safe restroom facilities, drinking water, and sanitary food preparation, storage, and eating facilities for Employees;
- b. Maintain worker dormitories, if provided, with appropriate emergency exits, access to clean water for drinking and showering, adequate lighting, heating, ventilation, and reasonable personal space.

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
9 (26)
Version
5.0

2.2.4.3 Emergency Preparedness

Supplier shall:

Identify and assess potential emergency situations and events, mitigating their impact through the implementation of measures such as, but not limited to, emergency plans, evacuation procedures, worker training, drill execution, appropriate fire detection systems, sufficient fire extinguishers, accessible first aid kits, adequate exit facilities, and a recovery plan.

2.2.4.4 Incident Reporting

Supplier shall:

- a. Have measures in place to report, record, and investigate all health and safety incidents, including root cause analysis, corrective actions to prevent their recurrence and record-keeping;
- b. Encourage Employees to report risks, hazards, opportunities, near misses, and health, safety, and well-being-related incidents;
- c. Report any severe incident, accident, or fatality occurring in the workplace and linked to the supplier's business relationship with Telia to a designated Telia representative via preestablished communication channels. The supplier is also required to cooperate with and support Telia in conducting investigations.

2.3 Environmental Requirements

At Telia, we prioritize suppliers and partners with climate targets in line with science, that have a decarbonization plan and apply circular economy principles. We encourage suppliers to provide ideas and innovative solutions that enable us to reduce negative impacts and maximize positive ones.

2.3.1 General Environmental Requirements

This section describes general environmental requirements, and where applicable, the delivery contract will stipulate further requirements for specific product and, or services.

2.3.1.1 Environmental Management System

Supplier shall:

Have an environmental management system (EMS) in accordance with the requirements outlined in Section 2.1.2.2 Management Systems.

2.3.1.2 Precautionary Principle

Supplier shall:

Apply an internationally recognized precautionary principle. This means that the supplier is responsible for always choosing products and solutions with low environmental footprint within the context of their commercial relationship with Telia. If there is uncertainty regarding the actual environmental impact, the product or solution shall be assessed and documented.

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
10 (26)
Version
5.0

If uncertainty remain thereafter, an alternative, well-known and from an environmental perspective more safe solution shall be chosen.

2.3.2 Climate Change

Mitigating climate change and actively working together with our suppliers to reduce GHG (greenhouse gas) emissions are key activities for Telia to reach our environmental targets.

2.3.2.1 Emission Reduction Commitments

Supplier shall:

Address its negative impact on climate change in a structured way, based on the following:

- i. Have publicly committed science-based emission reduction targets, with the ambition level of meeting the 1,5-degree scenario as presented by IPCC8 (November 2018). This means at least halving GHG emissions in the supplier's full value chain (Scope 1, Scope 2, and Scope 3) every ten years;
- ii. Have its science-based emission reduction targets verified by SBTi (Science Base Targets initiative) no later than the end of 2025. The targets shall include 2030 and 2040 interim targets;
- iii. Have a tangible action plan outlining key areas to address for reducing emissions within its value chain (including subcontractors) and disclose it to Telia upon request.

2.3.2.2 Transportation

Supplier shall:

- a. Reduce the environmental impact from transportation including but not limited to prioritizing fuel-efficient and low-emissions vehicles as means of transportation and logistics;
- b. Proactively suggest the best environmental means of transportation for the products and services sold to Telia;
- c. Demonstrate the environmental impact from the different transportation options the supplier can provide. Transport by air shall be the least preferred option.

2.3.3 Resource Use and Circularity

Telia expects our suppliers to proactively plan for production and transportation, focusing on reuse, repurposing, and recycling materials, and reducing waste generation.

2.3.3.1 Resource use

Supplier shall:

- a. Proactively demonstrate efforts to increase resource efficiency by reducing the use of primary (virgin) resources and increasing the use of secondary (recycled) and renewable resources, including energy and packaging;
- b. Address negative impacts on resource use by proactively exploring and applying the principles of circular design to minimize resources usage, prolong product lifetime, and enable resource recovery.

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
11 (26)
Version
5.0

2.3.3.2 Waste Management, Circularity and Reporting

- a. Supplier shall ensure proper waste management in line with the EU's Waste Framework Directive, with efforts to constantly move upwards in the waste hierarchy. This means aiming for the higher layers of the hierarchy through initiatives and efforts to prevent, reuse, repurpose and recycle materials along the upstream and downstream value chain, including both products and packaging;
- b. Suppliers involved in take-back, recycling and waste management shall be certified according to ISO 14001 or EMAS.

2.3.4 Hazardous Substances

As part of Telia's instruction "Banned and Restricted Substances" (Appendix 1), in-scope suppliers, responsible for providing electric and electronic equipment (EEE) to Telia, shall:

- a. Comply with the applicable laws, regulations, and customer requirements regarding banned or restricted substances, including but not limited to the Restriction of Hazardous Substances Directive (RoHS) and Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulations in the European Union (EU), regardless of the country where the product will be used;
- b. Prohibit the use of banned substances listed in Appendix 1, with exceptions for impurities of low concentration;
- c. Progressively replace substances under observation listed in Appendix 1, with suitable alternatives where economically and technically viable;
- d. Upon request, provide product information in substance level used in contracting;
- e. Ensure safe handling, reuse, recycling, and disposal of products.

2.4 Business Ethics Requirements

Telia prioritizes ethical behavior and integrity in all aspects of our business dealings. We expect suppliers to uphold the highest standards of integrity, transparency, and ethical conduct.

2.4.1 Anti-Bribery and Corruption

Supplier shall:

- a. Have an anti-bribery and corruption management system in accordance with the requirements outlined in Section 2.1.2.2 Management Systems;
- b. Not engage in or tolerate any form of bribery or corruption;
- c. Prohibit its Employees and/or subcontractors to directly or indirectly offer, promise, give, request, agree to accept or receive payments, gifts, any kind of undue benefits or charitable or political donations, to obtain or retain personal or business advantage, to or from any public official, Employee, agent, or representative of supplier, including Telia itself, or any other third party;
- d. Ensure to do not use third parties for channeling bribes to public officials or private sector bribes or negligently finance corruption;
- e. Keep accurate and transparent financial books and records.

2.4.2 Trade Sanctions and Export Control

Supplier shall:

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
12 (26)
Version
5.0

Ensure its business is conducted in compliance with any applicable trade restrictions and sanctions, as well as rules concerning export controls.

2.4.3 Conflicts of Interest and Transparency

Supplier shall:

- a. Ensure that any situation which may involve a conflict of interest, or the appearance of a conflict of interest between Telia and the supplier, must be avoided;
- b. Disclose all personal affiliations between employees of the supplier in the top management and Telia, such as family members, relatives, and friends that might create a situation of conflict of interest, or a perceived conflict of interest;
- c. Disclose whether any public officials are engaged in the top management of the supplier and promptly notify Telia if this changes or will change.

2.4.4 Fair Competition

Supplier shall:

- a. Conduct business operations in line with fair competition;
- b. Not engage in any practices or conduct business activities that are in breach of relevant competition or antitrust legislation in any jurisdiction where it operates;
- c. Promptly correct and report any action or behavior that could be seen as a breach of competition or antitrust law;
- d. Not participate in any form of bid rigging or other mechanisms that limit fair competition in tender situations, nor engage in any form of cartel practices with competitors, such as dividing or allocating markets or customers or price fixing.

3 Implementation and Accountability

In our commitment to responsible and ethical business practices, Telia places a strong emphasis on implementation and accountability to ensure adherence to our Supplier Code.

3.1 Reporting and Communication

Supplier is expected to keep accurate, timely, and relevant compliance performance information, accessible to Telia upon reasonable request, and to actively collaborate with Telia on reporting obligations. Furthermore, supplier shall provide product traceability information, contributing to transparency in the value chain.

Supplier is also responsible for reporting any suspected breaches of regulatory requirements or the Supplier Code, either directly to a Telia representative or anonymously through our secure web portal [EthicsPoint - Telia Company](#) or email: whistleblowing@teliacompany.com.

In case of conflict between requirements under national law and those of this Supplier Code, supplier must promptly consult with Telia without undue delay.

3.2 Compliance Verification

Telia reserves the rights to verify compliance with the Supplier Code through a combination of dialog and internal and/or external assessment mechanisms, including but not limited to

Owner
Chief Financial Officer**Date**
2024-05-27
Approved by
Chief Executive Officer**Page**
13 (26)
Version
5.0

self-assessments, surveys, offsite evaluations, site visits, Employees interviews and audits to supplier and subcontractors.

Assessment can be conducted by Telia representatives or a professional third party contracted by Telia. Moreover, Telia assessment can be conducted as part of joint programs across industry initiatives. Supplier shall therefore maintain relevant and complete documentation and records to demonstrate compliance.

Supplier shall close any finding regarding compliance with the Supplier Code within a reasonable timeframe; and timely provide evidence that the issue has been resolved, and the related risk is mitigated.

3.3 Termination

In the event of supplier's material breach of the requirements of the Supplier Code, Telia shall have the right to immediately terminate its agreement(s) with supplier, without prejudice to any other rights and remedies available.

Owner
Chief Financial Officer**Date**
2024-05-27**Approved by**
Chief Executive Officer**Page**
14 (26)**Version**
5.0

4 Definitions

Conflict Minerals: refer to tin, tantalum, tungsten, gold, and cobalt sourced from Conflict-Affected and High-Risk Areas.

Employee: everyone working for or on behalf of a supplier, including but not limited to full and part-time employees, consultants, contractors, trainees, temporary Employees, migrant Employees, senior management, and board of directors.

Hierarchy of Controls: systematic approach to improve occupational health and safety by eliminating hazards and managing risks. Each control step, from hazard elimination to personal protective equipment (PPE), is progressively less effective. Examples include hazard elimination, substitution, engineering controls, administrative controls, and providing PPE.

Public Official(s): a public official is referred to as any officer, employee, agent, or representative of any government (local, regional, national or international), majority government-owned or controlled entity or any person acting in an official capacity, including any candidate, official, or representative of a political party.

Owner
Chief Financial Officer**Date**
2024-05-27
Approved by
Chief Executive Officer**Page**
15 (26)
Version
5.0

5 Appendix

Appendix I: Telia Company List of Banned and Restricted Substances

1. Introduction

Telia has developed comprehensive lists of banned and restricted substances, known as the Black and Grey lists, respectively. These lists serve a crucial role in identifying and managing the materials and substances utilized in our products and packaging. This initiative extends across all operations of Telia and its subsidiaries, ensuring that what we deliver to our customers meets our stringent standards.

The primary aim of implementing these restrictions is to safeguard human health and protect the environment from harm. The list of banned substances (black list) aligns with global and national legal frameworks, in addition to reflecting Telia's commitment to environmental stewardship. Meanwhile, the list of substances to be restricted (grey list) identifies substances that, while not outright banned, require limitations on their use due to legal obligations, environmental policies of Telia, and specific market requirements.

2. Purpose

The purpose is to ensure that Telia follows its environmental policy, existing and anticipated environmental legislation and market requirements.

3. Requirements

3.1 Banned substances (black list)

In addition to legal bans on certain chemicals and materials, the following substances must not be present in products and services provided to Telia, nor must they be present in the contracting or manufacturing processes of these products and services. This refers to any deliberate use of the substance specified but does not apply in cases where a substance constitutes impurities of low concentration¹.

To be noted: All chemicals used in contracting will be evaluated separately, according to specific procedures and risk assessments.

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned</u> <u>usage</u>	<u>Legislation</u>
	2-benzotriazol-2-yl-4,6-ditert-butyl-phenol	3846-71-7 [223-346-6]	All applications	REACH: Candidate list and Annex XIV

¹ The maximum allowed concentration in RoHS by weight of the substances is <0,1% in homogeneous materials. Exemption: Maximum allowed concentration by weight of Cadmium: <0,01%. Other legal acts may have other threshold limits. For allowed concentrations of Chromium in Cement and Cadmium and Mercury in batteries, please contact Telia for additional information.

Owner
 Chief Financial Officer

Date
 2024-05-27
Approved by
 Chief Executive Officer

Page
 16 (26)
Version
 5.0

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned usage</u>	<u>Legislation</u>
	4,4'-diaminodiphenylmethane (MDA)	101-77-9 [202-974-4]	All applications	REACH: Candidate list and Annex XIV
Arsenic/arsenic compound ²		Several	In wood preservation substances	REACH: Annex XVII and some in Annex XIV
Asbestos		Several	All applications	REACH: Annex XVII
Azocolourants and azodyes that can decompose to carcinogenic aromatic amines		Several	All applications	REACH: Annex XVII
Benidine incl. salts, 4-aminobiphenyl incl. salts, thiocarbamide, phenyl -β-naphtyl amine		Several	All applications	REACH: Annex XVII
	Beryllium Oxide	1304-56-9 [215-133-1]	All applications	CLP harmonized classification
Cadmium and cadmium compounds		Several	All applications except of batteries for special applications ³	REACH: Annex XVII, several on Candidate list RoHS
Chromium (VI) compounds	Chromium (VI) compounds: lead chromate in general, and chromium (VI) compounds in pigments	Several	All applications	REACH: Annex XVII RoHS
	Cobalt dichloride ⁴	7646-79-9 [231-589-4]	All applications	REACH: Candidate list

² Arsenic and arsenic compounds on trace element level is acceptable.

³ Exception: Nickel-cadmium batteries in stationary applications where other types of batteries is not suitable due to extreme temperatures or charging procedures. Shall comply with Directive 2006/66/EC (Battery Directive) and Regulation (EU) 2023/1542 (Battery Regulation); Use of any exemptions from Cadmium restrictions in RoHS shall be reported to Telia.

⁴ Use of any exemptions from Chromium (VI) restrictions in RoHS shall be reported to Telia.

Owner
 Chief Financial Officer

Date
 2024-05-27
Approved by
 Chief Executive Officer

Page
 17 (26)
Version
 5.0

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned usage</u>	<u>Legislation</u>
Creosote		8001-58-9 [232-287-5]	All applications except for wood preservation (poles)	REACH: Annex XVII
	Dimethylfumarate (DMFu)	624-49-7 [210-849-0]	All applications	REACH: Annex XVII
Formaldehyde and formaldehyde-releasing substances		50-00-0 [200-001-8]	In articles ⁵	REACH: Annex XVII
Lead/ Lead compounds		Several	All applications except for lead acid batteries and lead sheeted cable maintenance ⁶	REACH: Annex XVII RoHS
CFCs – Chlorofluorocarbons		Several	All applications	The Montreal Protocol and Regulation EC/1005/2009
Halons		Several	All applications	The Montreal Protocol and Regulation EC/1005/2009

⁵ Can be used in articles if they comply with REACH Annex XVII, entry 77.

⁶ EU RoHS directive accepts concentration by weight <0,1% in homogeneous material. Stated exemptions still in force in Annex III and Annex IV to the RoHS directive, 2011/65/EU, and its amendments can be used until Telia communicates otherwise. Supplier must inform Telia in advance of the delivery regarding material content. Telia takes a restrictive standpoint towards use of lead in solders in servers, storage and array systems, network infrastructure equipment for switching, signalling, transmission as well as network management for telecommunication. The RoHS exemption 7b may only be used in deliveries under specific situations agreed by Telia in advance. Lead plates can be used in lead shielded cable repair if lead free alternatives do not exist.

Owner
Chief Financial Officer

Date
2024-05-27

Approved by
Chief Executive Officer

Page
18 (26)

Version
5.0

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned usage</u>	<u>Legislation</u>
HCFCs – Hydrochlorofluorocarbons		Several	All applications	The Montreal Protocol and Regulation EC/1005/2009
	Bromochloromethane	74-97-5 [200-826-3]	All applications	The Montreal Protocol and Regulation EC/1005/2009
	Carbon tetrachloride	56-23-5 [200-262-8]	All applications	The Montreal Protocol and Regulation EC/1005/2009
	Methyl bromide	74-83-9 [200-813-2]	All applications	The Montreal Protocol and Regulation EC/1005/2009
	Methylene chloride	75-09-2 [200-838-9]	All applications	REACH: Annex XVII
	1-bromopropane	106-94-5 [203-445-0]	All applications	The Montreal Protocol and Regulation EC/1005/2009 REACH: Candidate list and Annex XIV
	Tetrachloroethylene	127-18-4 [204-825-9]	All applications	CoRAP
	1,1,1-trichloroethane	71-55-6 [200-756-3]	All applications	The Montreal

To report a concern or breach of the Supplier Code of Conduct, please follow this link: [EthicsPoint - Telia Company](#)

Owner
Chief Financial Officer

Date
2024-05-27
Approved by
Chief Executive Officer

Page
19 (26)
Version
5.0

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned usage</u>	<u>Legislation</u>
				Protocol and Regulation EC/1005/2009
	Trichloroethylene	79-01-6 [201-167-4]	All applications	REACH: Candidate list and Annex XIV
	1,2,4-Trichlorobenzene (TBC)	120-82-1 [204-428-0]	All applications	REACH: Annex XVII
Hexabromocyclo dod ecane (HBCDD) and all major diastereoisomers identified		25637-99-4 3194-55-6 134237-50-6 134237-51-7 134237-52-8 [247-148-4] [221-695-9]	All applications	REACH: Annex XIV POPs-regulation
Isocyanates		Several, for instance in thermoplastics and urethanes	All applications except in manufacturing processes	REACH: Annex XVII
Mercury/ Mercury compounds		Several ⁷	All applications	REACH: Annex XVII RoHS
Perfluorooctanoic acid (PFOA)	Pentadecafluorooctanoic acid Ammonium pentadecafluorooctanoate Sodium pentadecafluorooctanoate Potassium pentadecafluorooctanoate Silver pentadecafluorooctanoate Pentadecafluorooctanoyl fluoride Methyl pentadecafluorooctanoate Ethyl perfluorooctanoate	335-67-1 3825-26-1 335-95-5 2395-00-8 335-93-3 335-66-0 376-27-2 3108-24-5 [206-397-9 and others]	All applications	POPs-regulation

⁷ Use of any exemptions from Mercury restrictions in RoHS shall be reported to Telia.

Owner
 Chief Financial Officer

Date
 2024-05-27

Approved by
 Chief Executive Officer

Page
 20 (26)

Version
 5.0

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned usage</u>	<u>Legislation</u>
C9-C14 linear and/or branched perfluorocarboxylic acids (C9-C14 PFCAs)	C9-C14 linear and/or branched perfluorocarboxylic acids (C9-C14 PFCAs), their salts and C9-C14 PFCAs-related substances, perfluorononan-1-oic acid (PFNA); nonadecafluorodecanoic acid (PFDA); heneicosfluoroundecanoic acid (PFUnDA); tricosfluorododecanoic acid (PFDoDA); pentacosfluorotridecanoic acid (PFTrDA); heptacosfluorotetradecanoic acid (PFTDA); including their salts and precursors	Several	All applications	REACH: Candidate list and Annex XVII
Perfluorooctane sulfonic acid and its derivatives (PFOS)		Several	All applications	POPs-regulation
	Nonylphenol	25154-52-3 [246-672-0]	All applications	REACH: Candidate list and Annex XVII
	Nonylphenol, ethoxylated (Nonylphenolpolyglycol ethers)	9016-45-9 [500-024-6]	All applications	REACH: Candidate list, Annex XIV and Annex XVII
Organostannic compounds		Several	All applications	REACH: Annex XVII
	Acrylamide	79-06-1 [201-173-7]	All applications	REACH: Annex XVII
PBB – Polybrominated biphenyls			All applications	REACH: Annex XVII RoHS
PBDE – Polybrominated diphenylethers		Several	All applications	RoHS

⁸ Reactive appointed TBBP exemption to the ban.

Owner
 Chief Financial Officer

Date
 2024-05-27
Approved by
 Chief Executive Officer

Page
 21 (26)
Version
 5.0

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned</u> <u>usage</u>	<u>Legislation</u>
(including decaBDE)				
Phthalate plasticizers	Bis (2-ethylhexyl) phthalate (DEHP); Dibutyl phthalate (DBP); Diisobutyl phthalate (DIBP); and Benzyl butyl phthalate (BBP)	117-81-7 [204-211-0]; 84-74-2 [201-557-4]; 84-69-5 [201-553-2]; and 85-68-7 [201-622-7]	All applications	REACH: Annex XVII, Candidate list, and Annex XIV RoHS
Polychlorinated Biphenyls (PCB)		Several	All applications	POPs-regulation
Polychlorinated Naphtalenes (PCN)		Several	All applications	POPs-regulation
Polychlorinated Terphenyls (PCT)		Several	All applications	REACH: Annex XVII
	Short Chained Chlorinated Paraffins (C10-C13)	85535-84-8 [287-476-5]	All applications	REACH: Candidate list POPs-regulation
	Tris (2-chloroethyl) phosphate (TCEP)	115-96-8 [204-118-5]	All applications	REACH: Candidate list and Annex XIV
Tri-substituted organostannic compounds (including Tributyl tin and Triphenyl tin compounds)		Several	All applications	REACH: Annex XVII
Pesticides / Herbicides		Several	Construction work and real estate	Herbicides such as Glyphosate is not to be used at Telia premises or during construction and maintenance or field work on

 To report a concern or breach of the Supplier Code of Conduct, please follow this link: [EthicsPoint - Telia Company](#)

Owner
 Chief Financial Officer

Date
 2024-05-27

Approved by
 Chief Executive Officer

Page
 22 (26)

Version
 5.0

Banned substances (black list)				
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Banned usage</u>	<u>Legislation</u>
				behalf of Telia.

3.2 Restricted substances (grey list)

The following substances are under observation and the presence of them in products or their use cause concern. These substances should be progressively replaced by suitable alternative substances or technologies where these are economically and technically viable in contracting, manufacturing processes of products and services to Telia. This refers to any intentional use of the substance specified but does not apply in cases where a substance constitutes of impurities of low concentration⁹. To be noted: All chemicals used in contracting are to be evaluated separately, according to specific procedures and risk assessments.

Please notice that the producer/supplier shall be able to report the content of all specified materials / substances listed below including chemicals specified in the REACH candidate list when requested by Telia.

Restricted substances (grey list)			
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Reason for concern and reference</u>
	4,4'-Isopropylidendiphenol Bisphenol A (BPA)	80-05-7 [201-245-8]	REACH: Candidate list and Annex XVII
	1,2-Benzene-dicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich	71888-89-6 [276-158-1]	REACH: Candidate list and Annex XIV
	1,2-Benzene-dicarboxylic acid, di-C7-11-branched and linear alkyl esters (DHNUP)	68515-42-4 [271-084-6]	REACH: Candidate list and Annex XIV
Antimony and its compounds		Several	Some compounds in CoRAP
Aromatic amines ¹⁰		Several	Many compounds in the group are carcinogenic

⁹ The maximum allowed concentration by weight of the noted substances is <0,1% in homogeneous materials. For the following substance, the maximum allowed concentration is Cadmium <0,01%. Other legal acts may have other threshold limits. For allowed concentrations of Chromium in Cement and Cadmium and Mercury in batteries, please contact Telia for additional information.

¹⁰ Some are banned according to REACH Annex XVII

Owner
 Chief Financial Officer

Date
 2024-05-27

Approved by
 Chief Executive Officer

Page
 23 (26)

Version
 5.0

Restricted substances (grey list)			
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Reason for</u> <u>concern and</u> <u>reference</u>
Beryllium and its compounds		Several	Several compounds in the group are carcinogenic Negatively affects recycling
	Bis(2-methoxyethyl) phthalate	117-82-8 [204-212-6]	REACH: Candidate list and Annex XIV
Bismuth and its compounds		Several	Negatively affects recycling
Chlorinated polymers		Several	Negatively affects recycling
Fluorocarbons – FC		Several	Global warming, regulated in EU F-gas regulation
Fluorohydrocarbons – HFC		Several	Global warming, regulated in EU F-gas regulation
Halogenated flame retardants except those on black list ¹¹		Several	Negatively affects recycling
Lead/lead compounds in batteries. Certain applications are banned		Several	Toxic, regulated in EU Battery directive and Battery regulation
Manganese and Manganese compounds (and dioxide)		Mn: 7439-96-5 [231-105-1] MnO ₂ : 1313-13-9 [215-202-6]	Toxic, REACH registrations
Medium chained chlorinated paraffin's C14-C17		Several [799-971-8]	REACH: Candidate list
Nickel and its alloys, except in steel alloys		Several	Allergenic, note restriction in REACH Annex XVII for contact with skin

¹¹ See Telia's "black list."

Owner
 Chief Financial Officer

Date
 2024-05-27
Approved by
 Chief Executive Officer

Page
 24 (26)
Version
 5.0

Restricted substances (grey list)			
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Reason for concern and reference</u>
	Nitrogen trifluoride	7783-54-2	Global warming, regulated in EU F-gas regulation
Perchlorates		Several	May cause fire or explosion
Phthalate (Except the ones that are restricted)		Several	Phthalate group includes several restricted substances
Polycyclic Aromatic Hydrocarbons (PAH)		Several	REACH: Annex XVII
Poly Vinyl Chloride (PVC)		Several	Negatively affects recycling
Poly- and perfluoroalkyl substances (PFAS)	Any substance that contains at least one fully fluorinated methyl (CF ₃ -) or methylene (-CF ₂ -) carbon atom (without any H/Cl/Br/I attached to it)	Several	Proposed restriction under REACH
Radioactive substances		Several	Carcinogenic
Selenium and selenium compounds		Several Se: 7782-49-2 [231-957-4]	Toxic, REACH registrations
	Sodium dichromate	10588-01-9 7789-12-0 [234-190-3]	REACH: Candidate list and Annex XIV
	Sulfur hexafluoride, SF ₆	2551-62-4 [219-854-2]	Global warming, regulated in EU F-gas regulation
	N,N'-bis(1,4-dimethylpentyl)-p-phenylenediamine (77PD)	3081-14-9 [221-375-9]	In CoRAP
	N-1,3-dimethylbutyl-N'-phenyl-pphenylenediamine (6PPD)	793-24-8 [212-344-0]	Toxic, REACH registrations
	N-(cyclohexylthio)phthalimide	17796-82-6 [241-774-1]	Toxic, REACH registrations

 To report a concern or breach of the Supplier Code of Conduct, please follow this link: [EthicsPoint - Telia Company](#)

Owner
 Chief Financial Officer

Date
 2024-05-27

Approved by
 Chief Executive Officer

Page
 25 (26)

Version
 5.0

Restricted substances (grey list)			
<u>Group</u>	<u>Substance</u>	<u>CAS no</u> <u>[EC no]</u>	<u>Reason for concern and reference</u>
	4-(1,1,3,3-tetramethylbutyl)phenol	140-66-9 [205-426-2]	Toxic, REACH registrations
Thermosetting Plastic's (Acrylate, Amino, Epoxy, Urethane-PUR incl. isocyanates and diisocyanates).	Such as but not limited to: '2,3-epoxypropyl methacrylate; glycidyl methacrylate, dibutyltin dilaurate and dibutyl[bis(dodecanoyloxy)] stannane	Examples: 607-12300-4, [203-441-9] 106-91-2 050-03000-3	Some raw materials have hazardous properties and are regulated. High temperatures may cause the release of hazardous substances.
All substances on the REACH candidate list ¹² that have not been specified above		Several	Several

4. Terms and Abbreviations

Terms and abbreviations	Definition
REACH	Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals; Annex XIV is a list of substances subject to authorization; Annex XVII sets out Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures, and articles; the candidate list is a list of substances of very high concern (SVHC)
RoHS	Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment
Regulation (EC) No 1005/2009	Regulation (EC) No 1005/2009 on substances that deplete the ozone layer
POPs-regulation	Regulation (EU) 2019/1021 on persistent organic pollutants
F-gas regulation	Regulation (EU) No 517/2014 on fluorinated greenhouse gases
CLP	Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures
Battery directive	Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators

¹² <http://echa.europa.eu/candidate-list-table>

Owner
Chief Financial Officer**Date**
2024-05-27**Approved by**
Chief Executive Officer**Page**
26 (26)**Version**
5.0

Battery regulation	Regulation (EU) 2023/1542 concerning batteries and waste batteries
CoRAP	Community Rolling Action Plan, a list of substances that a Member State in the EU has evaluated or will evaluate over the coming years.
CAS	Chemical Abstract Service
EC Number	European Community number
ECHA	European Chemical Agency