

Telia Code of Conduct

Always aiming for better



Contents

Section one: Introduction2

Section two: We are a responsible corporate citizen.....3

Anti-bribery and corruption4

Conflicts of interest4

Anti-insider trading5

Anti-money laundering5

Children's rights6

Environmental responsibility6

Fair competition.....7

Freedom of expression and surveillance privacy.....7

Human rights8

Privacy.....8

Third parties.....9

Trade sanctions and export control.....9

Section three: We are a responsible employer.....10

Communication and media relations.....11

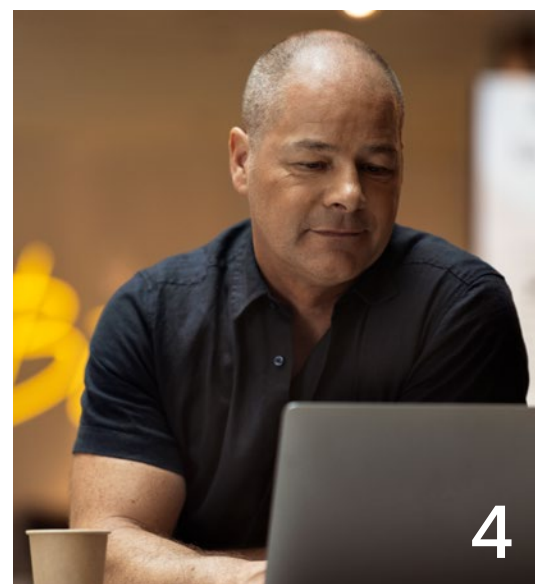
Company information assets11

Diversity, inclusion and equal opportunity12

Occupational health, safety and well-being12

Travel13

Section four: We are a responsible TV media owner14



Welcome to the Telia Code

This Code is designed to inspire and guide us in our everyday work, serving as our ethical compass as we travel forward.

For us who work at Telia, the Telia Code demonstrates our commitment to holding ourselves to the highest possible standards. It helps us build and maintain trust with each other, as well as with our customers and the communities and societies that depend on us.

The Telia Code applies to Telia employees, board members, members of our extended workforce – such as suppliers, consultants, freelance and temporary workers – and anyone else who works or provides services for or on behalf of Telia.

We commit to live by the Code, making sure that it becomes part of our everyday work culture. We understand that breaches will result in disciplinary action and/or legal action.

This Code and our related policies and ways of working comply with applicable laws, regulations as well as international conventions, including:

- The United Nations (UN) Universal Declaration of Human Rights
- The Core Conventions of the International Labour Organization (ILO)
- The Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD)
- UN Global Compact
- UN Guiding Principles on Business and Human Rights

- The Children's Rights and Business Principles
- The 1.5-degree ambition expressed in the Paris Agreement on climate.

We also fully support the ambitions of the UN Sustainable Development Goals and work with other organizations and initiatives when we believe we can contribute to the development of ethical and responsible business practices.

Moreover, we continually review and update our ethical commitments and performance against our Code when we feel we can strengthen or improve them.

Get in touch

Doing business with integrity is our shared responsibility. So, if you witness or experience any violations of the Telia Code, don't hesitate to report your concern through our independent [Speak Up Line](#).

Section two:

We are a responsible corporate citizen

We aim to embody Telia's values as we support and enhance quality of life in the societies where we operate.



Link to public steering documents: [Public policy – Telia Company](#)

1. Anti-bribery and corruption

Definitions

Corruption is the abuse of entrusted power for private gain. It can take many forms and can occur in both private and public sectors.

Bribery is an offering, provision, authorization, request or receipt of financial or other advantage intended to influence a transaction or decision or to encourage misuse of a person's position.

A **public official** is any officer, employee, agent or representative of any local, regional, national or international government, majority government-owned or controlled entity.

The Telia Way

At Telia, we recognize that corruption is damaging to people and to the planet. We believe that corruption in any form is unacceptable, and we adopt preventive measures against it.

We strive to act with the highest standards of transparency and integrity wherever we operate. We always take appropriate care when engaging with third parties, such as partners, suppliers, consultants, subcontractors, lobbyists, agents and agencies.

We always keep accurate and transparent financial records, as this helps ensure that all our payments are made for the right reasons.

A gift or business hospitality becomes a bribe when there is intent to influence the recipient's business decisions or actions. Accepting or offering a bribe is a crime. At Telia, we have a restrictive view on gifts and hospitality. Any gift or act of hospitality should always be openly disclosed, accurately recorded, of reasonable value, and appropriate to the nature of the business relationship.

We never accept or offer to pay for trips or accommodations in relation to business hospitality. We never offer or accept to bring a companion or "plus one" who is not a colleague, and we never offer or accept anything from a party with whom we are in negotiation or tendering.

We avoid business hospitality to public officials unless it is directly related to a legitimate business purpose, modest in nature and not given to obtain or retain business or secure other improper advantages. Apart from Telia-branded items of minimal value, we never offer gifts to public officials or their relatives.

Detailed guidelines on values and specific situations are found in our policy and instructions which are reviewed annually.

We are careful to always plan and manage any sponsorships and donations with integrity, in ways that create social value, and that are in line with our values and sustainable business objectives.

We always consider the risks of corruption and never use sponsorships and donations to influence business processes with customers. Additionally, we always follow up on our sponsorships and donations to ensure that they resulted in their intended purpose.

2. Conflicts of interest

Definitions

A **conflict of interest** exists when financial or other personal incentives influence – or may appear to influence – an employee's loyalty, professional judgement or performance of duty.

The Telia Way

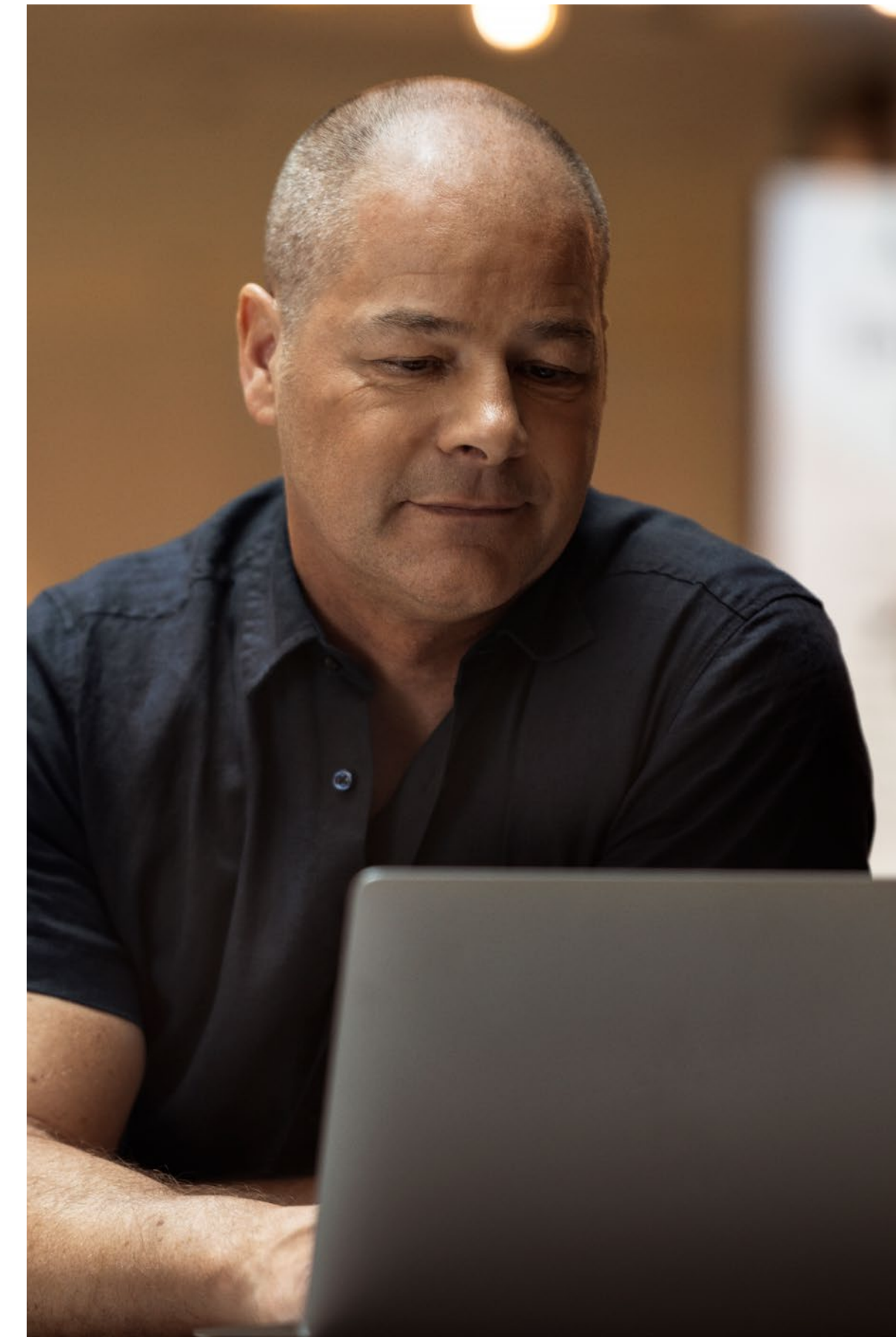
We make sure that all our decisions can be made without the influence of private interests or other loyalties. We do this by actively avoiding situations that create potential or perceived conflicts of interest between our personal and our business activities.

We are always fair, transparent and objective in all our decision-making processes. We do not make personal gains from business transactions or from information obtained in the course of our work.

We always keep relationships with our suppliers and business partners professional. Furthermore, we do not give preferential treatment to close contacts, such as family or friends.

We voluntarily disclose conflicts of interest if they arise. When we become aware of potential or perceived conflicts of interest, we immediately inform our managers and follow the conflict of interest disclosure procedure.

To avoid the risk of a conflict of interest, we seek and obtain approval before working outside of Telia in any capacity. We also disclose if we engage in any other activities outside our Telia employment that may create a potential or perceived conflict of interest.



3. Anti-insider trading



Definitions

Insider information is information that, if made public, is likely to have a significant effect on the value of shares or other securities.

Insider trading is illegal in most countries. It is the use of insider information to trade shares or other securities, or the sharing of information with others who might use it to trade.

The Telia Way

We take great care to protect confidential business information, especially when its disclosure could influence the share price of Telia or another company.

We do not reveal or use confidential business information or insider information, even if accidentally obtained, to unauthorized people. Similarly, we avoid spreading rumors or misleading others with inaccurate information.

We refrain from buying or selling shares and other securities in any companies while in possession of insider information. These rules also apply after we stop working at Telia.

4. Anti-money laundering

Definitions

Money laundering is the process by which criminals disguise the illegal origin of proceeds by making criminal proceeds appear to have come from legitimate sources.

Terrorist financing refers to the financial support of terrorist acts, which include particularly serious crimes, such as murder, aggravated assault, kidnapping, arson or gross sabotage.

Terrorist financing is not limited to direct financial contributions to terrorism. It also includes the act of collecting funds, making funds accessible, or receiving funds or other property with the purpose of financing terrorism or with the knowledge that those assets are intended to finance terrorism.

The Telia Way

We make sure that we earn all our revenues in ethical and legal ways.

We prevent money laundering and combat terrorist financing by maintaining transparency and following standard processes in all our financial activities.

Preventing money laundering and combatting terrorist financing means that we never deal with suspected criminals or terrorists or assist with the acquisition or control of criminal property. In addition, we never provide funding or support to suspected terrorist activities, persons or organizations listed on sanction lists. Nor do we take part in deals that involve unrelated parties, unusual payment methods or abnormal terms and conditions.

We always engage with current or potential customers or suppliers in professional and consistent ways. We carry out all deals and financial activities with complete transparency and in line with standard processes.

Before entering business deals, we perform due diligence on third parties when required. Moreover, we report suspicious activities or transactions that could involve money laundering or terrorist financing issues.

5. Children's rights

Definitions

A **child** is any person under the age of 18. All children have rights which must be recognized, respected and supported.

Children's rights include, for example, the right to privacy, to information and participation, to freedom of expression, to leisure and play, to safety and protection from all forms of abuse and to health and well-being.

The Telia Way

At Telia, we recognize, respect and support the rights of children. For this reason, our own operations conform with the UN Global Compact Children's Rights and Business Principles.

Our business activities impact children and young people as they are active users of our products and services. Hence, we must always keep their best interests in mind.

We ensure that our products and services are age-appropriate and safe for children to use. We seek to educate children, parents, caregivers and teachers about children's safety online. We also support the responsible use of information and communication technologies.

We use marketing and advertising that respects and supports children's rights. Moreover, we listen to and understand children's online experiences by engaging with them through meaningful child participation. Doing so enables us to better protect and empower children online through our services and digital skills initiatives.

We have zero tolerance for online child exploitation and abuse. In line with this principle, we strictly prohibit the use of workplace equipment for looking at child sexual abuse material. Any incidences will be reported to the local police authorities. By detecting and reporting people who keep child sexual abuse materials on company equipment, we help law enforcement officers rescue children from sexual abuse while protecting others from future exploitation.

Child labor in any form is prohibited within our own operations and in our supply chain.

With regard to TV/Media, we always follow strict routines to safeguard children's rights in content production involving children.

6. Environmental responsibility

Definitions

An **environmental impact** is an effect on the environment resulting from a product, service or activity. Impacts should be considered for the whole life cycle of a product – in other words, from the extraction of raw materials to the production and usage phase, through to final end-of-life treatment.

The Telia Way

Climate change and the unsustainable use of natural resources are two of the most pressing issues of our time. The release of greenhouse gases leads to global warming and consequently to climate change.

We are committed to achieving a climate-neutral value chain by 2030, by at least halving CO₂ emissions, compared to 2018, and offsetting the rest. By 2040, we will go further, to net zero, through additional emission reductions of at least 90%, while neutralizing the rest.

In parallel, we work to achieve zero waste by 2030, within our own and network operations. In practice that means scaling reuse and recycling efforts, to ensure that nothing is incinerated or sent to landfills.

While taking responsibility for our own negative footprint, we want to enable our customers to do the same. Digitalization enables a more efficient use of natural resources and can therefore accelerate both climate action and the transition to a circular economy.

We proactively address the environmental impact of our business decisions and ensure that they are aligned with our 2030 and 2040 goals.

We reduce our negative footprint by operating and designing our networks in the most efficient and environmentally friendly way.

We only use renewable electricity in our own operations.

We collaborate closely with our suppliers and require them to reduce their emissions in alignment with climate science.

We generate a positive impact by offering products and services that help our customers reduce their environmental impact.

We inform, inspire and educate our customers about possible solutions for using natural resources more efficiently.

We always consider virtual meetings as our first choice and select environmentally conscious options when travel is necessary.

We apply the circular approach – Prevent, Reduce, Reuse and Recycle – both within Telia and in our business offerings.

7. Fair competition

Definitions

Competition legislation exists to protect consumers and society from market disruptions caused by anti-competitive practices.

The Telia Way

We at Telia conduct all our business according to applicable competition legislation, because free and fair competition leads to the best outcomes for consumers, our business and society.

We do not enter into agreements with the intention of preventing, restricting or distorting competition, nor do we make agreements that have such an effect. Instead, we carefully assess the lawfulness of any interactions or agreements with competitors.

There may be company-specific rules that apply to our operations because of our market shares or commitments – for instance, after a merger or acquisition.

When dealing with competitors, we do not discuss or conclude agreements concerning confidential or commercially sensitive issues, such as prices, pricing policies, profit margins, customers, suppliers or marketing.

We never disclose our intentions regarding participating in tenders to actual or potential competitors, and we do not agree on joint tenders without seeking previous legal advice. Furthermore, we always seek legal advice before entering any agreements with competitors.

When dealing with suppliers, customers or resellers, we don't fix prices, divide markets or agree on exclusivity. We always check with Legal Affairs to find out whether an agreement is lawful if our customer or supplier is a competitor.

In markets where we hold a high market share, we are especially aware of the effects that our decisions have on customers, competitors and service providers. In short, we do not abuse a dominant market position.

8. Freedom of expression and surveillance privacy

Definitions

Freedom of expression and opinion is a fundamental human right defined in the Universal Declaration of Human Rights:

“Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.”

The **right to surveillance privacy** refers to individuals' right to privacy in relation to authorities that mandate or request access to user data. Such requests risk having chilling effects on free speech.

The Telia Way

We at Telia respect and promote the right to freedom of expression and the privacy of users in relation to governments and authorities.

We protect and support Telia's commitments in relation to free flow of information, freedom and independence of mass media and an open and democratic society. This means that we've incorporated these aspects into our day-to-day operations and decision making.

Moreover, we always raise concerns about new legislative, administrative, licensing or law enforcement rules if they may negatively impact the rights and values mentioned above.

We are as transparent as possible when governments restrict communications or apply surveillance measures that risk negatively impacting human rights. Furthermore, we only comply with governments' requests to the extent required by law.

Although our management pursues public advocacy to promote freedom of expression, privacy and the freedom of the media, we do not get involved in party politics.

9. Human rights



Definitions

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status.

The Telia Way

We respect and support the human rights of all people affected by our business throughout societies where we operate. Human rights are universal, indivisible and interdependent. Companies are to respect human rights and avoid contributing to or causing human rights harm to individuals.

We strive to identify, prevent, mitigate and remedy adverse human rights impacts throughout our workplace, business operations and in the communities where we work.

We are especially careful and aware of human rights issues when working with privacy, freedom of expression, freedom of the media and children's rights. In addition, there are other areas with human rights implications that we continuously monitor. These include corruption, environment, artificial intelligence and supply chains, including conflict minerals and trade sanctions.

Through our work on digital inclusion, we aim to enable the realization of a broad set of human rights.

We recognize the potential positive impact that high-quality connectivity and digital solutions can have on society, such as increased access to information, education and more. At the same time, we are aware of the risk that our technologies could contribute to worsening existing inequalities, should the digital divide deepen.

10. Privacy

Definitions

The **right to privacy** is the fundamental human right of an individual to remain free from undue interference to their privacy, data, home or family.

Personal data includes all information about a person whose identity is clear or can be established by obtaining or combining additional information.

Personal data protection originates from the right to privacy and relates to the collection, use and processing of an individual's personal data.

The Telia Way

Our customers and colleagues at Telia trust us with their personal and confidential information. We thus ensure that we live up to that trust by respecting and safeguarding their privacy.

We take great care to maintain the confidentiality of personal information and process it only to the extent needed and allowed for completing our work. Moreover, we comply with applicable legislation and the mandatory regulations and instructions issued by the competent authorities to safeguard confidential information.

We make privacy and personal data protection a core consideration in everything we do. In other words, we integrate privacy as a natural part of our services, processes and IT infrastructure, as well as in our daily work by using a 'privacy by design' approach. Furthermore, we never take any action that affects personal data or privacy before we are sure it complies with our privacy requirements.

We only collect relevant personal data in order to provide our services and run our business. The collected data is used only for lawful purposes, while protecting its confidentiality and integrity. When the data is no longer needed for these purposes, we delete or anonymize it, unless any legal obligation requires us to keep it.

We maintain transparency by making information available to our customers and employees on how their personal data is used. In addition, we provide them with meaningful choices on how to control their data.

11. Third parties

Definitions

Third-party management refers to processes whereby a company monitors and manages its interactions with all external parties with whom it has a relationship.

Third parties of Telia include suppliers, resellers, business partners, customers and agents, among others.

The Telia Way

At Telia, we act with the highest standards of integrity and expect all our third parties to behave in the same way. Based on our values and our commitments to customers and other stakeholders, we strive to ensure that we only work with responsible third parties.

We make every effort to reduce and mitigate risk exposure to our business, as well as to individuals and the environment, which may be impacted by our operations.

Our sourcing approach supports our business activities by implementing a set of standardized processes, tools, rules and governance. By purchasing responsibly, we can build reliable, long-term business relations with suppliers and other third parties while using company resources in the most efficient way.

We continuously assess whether our third parties' activities are in line with our values. In addition, we always consult with our managers or raise our concerns if we have any doubts that a third party does not share our values.

We do not share confidential information such as purchase prices, sourcing projects or contract conditions, internally nor externally.

12. Trade sanctions and export control

Definitions

Trade sanctions are restrictions or prohibitions issued by one or more countries and targeted against a country, an organization, a group or an individual. The most common types of trade sanctions are quotas, tariffs, asset freezes and embargoes.

Export control refers to laws and regulations restricting the export and transfer of goods, software and technology to other countries.

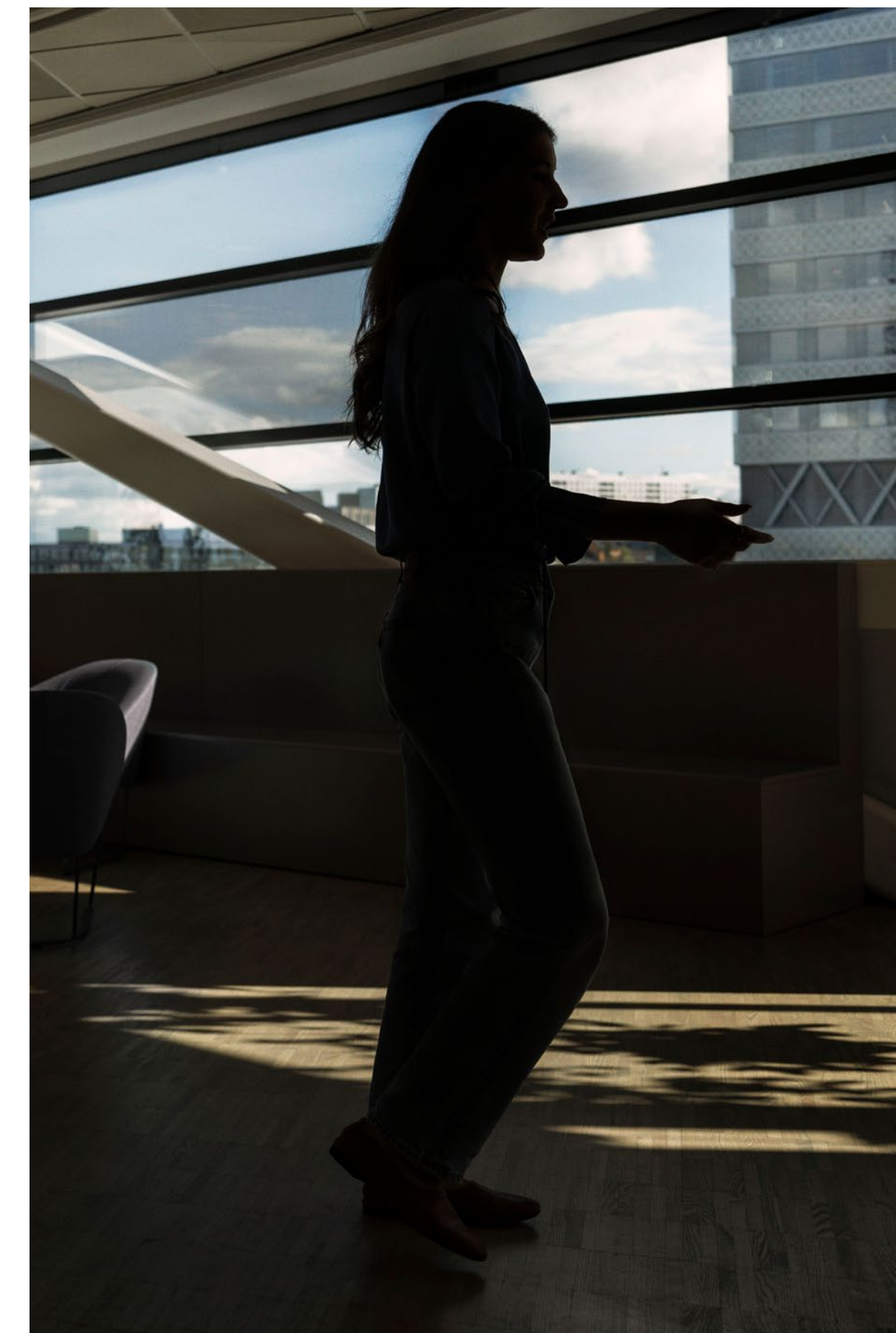
The Telia Way

Telia operates internationally with a focus on the Nordics and Baltics. For this reason, we must ensure that we understand the risks related to international business dealings. Doing so enables us to comply with relevant trade and export control laws and regulations.

We continuously screen our business dealings to avoid collaborating with sanctioned individuals and entities.

We follow export control laws when we export, re-export or transfer any products, including dual-use products.

To help our customers adhere to export control laws, we inform them clearly if products or services are covered by export control. In addition, we require our third parties to comply with applicable regulations on trade sanctions and export controls.



Section three:

We are a responsible employer

We are committed to building a diverse and inclusive culture that secures every employee's rights and enables them to perform at their best.



Link to public steering documents: [Public policy – Telia Company](#)

13. Communication and media relations

Definitions

Communication refers to the sharing of information both internally and externally to various stakeholders.

Media relations involve working with the media for the purpose of informing the company's different stakeholders and the general public, in line with Telia's policies and practices.

The Telia Way

We aspire to be proactive, transparent, straightforward and relevant in all our communications. We provide all information in accordance with local laws and the rules and established practices governing listed companies. Additionally, we do not speak on behalf of the company unless we are authorized to do so.

We protect confidential information about Telia. Furthermore, we act with good judgement and are personally responsible for the content we publish online and on social media. Unless authorized as a spokesperson, we make it clear that the views and comments we share online and on social media are personal and not posted on Telia's behalf.

We do not post anything that can harm Telia's reputation or is inconsistent with our values and the Telia Code.

We always engage our External Communications office before we speak externally on behalf of Telia.

14. Company information assets

Definitions

Non-public information is internal, confidential or secret information that is not intended for the public.

All other definitions on information classifications are to be found in our internal documents, which are updated regularly.

The Telia Way

There are three dimensions to how we protect information at Telia: Confidentiality means that we protect information from exposure to unauthorized people. Integrity denotes that we ensure that information is accurate and complete. Availability means that we ensure that information is accessible and usable when needed.

We only use company information for work tasks and never for personal purposes. For example, we do not disclose information on social media unless we have permission to do so.

We also understand that it's important to protect company information against accidental or unauthorized disclosure, misuse, improper alteration or destruction. Therefore, we are extra prudent when handling information outside our workplace.

We keep our desks clear of papers and removable storage media. We lock these away when we are not using them, and we use only company approved equipment, services and software. We always follow the acceptable use terms and conditions for IT equipment, as set by our local Country or Group function. These terms and conditions may take the form of a mobile device policy or remote access policy.

We stay safe on the internet by not clicking on suspicious links or opening questionable email attachments. We avoid content with unknown license terms and protect email attachments with a password if we believe the information is sensitive.

If we suspect or are aware of a security incident, fraud or threat, we report it immediately to our Security Incident Report function. We also inform our manager when suitable.

15. Diversity, inclusion and equal opportunity

Definitions

A **diverse workforce** is one that represents people from different backgrounds and identities in all professions and levels of the company.

Inclusion is a state in which a work culture supports all employees in reaching their full potential by allowing them to be themselves.

Equal opportunity means that regardless of their background or identity, every employee has the chance to contribute, lead and grow with the company on equal terms.

The Telia Way

At Telia, we encourage everyone to be their best, most brilliant and authentic selves. We care for each other and treat everyone with respect. We provide equal opportunities to ensure that our workforce reflects the diversity of the customers and societies we serve.

We are committed to implementing fair employment practices and actively fighting all forms of discrimination and expressions of harassment.

Diversity and inclusion are integral parts of our company culture as well as ways to bring our purpose and values to life. Every day, we strive to improve diversity and inclusion. Moreover, we respect and work in line with international human and labor rights standards.

We uphold a safe and rights-respecting working environment that meets or exceeds current global standards and legislation. Our working conditions comply with local statutory requirements as well as collective

bargaining agreements, where applicable.

All Telia employees have the right to form or join associations and to bargain collectively.

All employees must be able to enjoy equal opportunities based on competence, experience and performance, regardless of gender, gender expression, ethnicity, religion, age, disability, sexual orientation, nationality, parental status, political opinion, union affiliation, social background and other characteristics protected by law.

We have zero tolerance for discrimination, unequal pay, sexual harassment, harassment or bullying.

16. Occupational health, safety and well-being

Definitions

Occupational health, safety and well-being refer to all working conditions in the workplace.

The **physical work environment** includes work tools, equipment, processes, the air, sound, light and other concrete factors. The **organizational work environment** involves how work is communicated, tasks are assigned, work requirements and the like. The **social work environment** refers to well-being at work, collaboration, support from managers and colleagues, and other similar factors.

The Telia Way

We believe that health refers to an individual's capacity to fulfill everyday work requirements and meet their own goals. We also believe that well-being is a broader term than health. It encompasses good mental health, high life satisfaction, a sense of meaning or purpose, and the ability to manage stress.

Our approach to health and well-being at Telia is built on promoting healthy and safe work conditions, preventing occupational risks and ill health, and rapidly reacting to injuries and unsafe conditions. This applies to physical, organizational and social aspects.

We aim to protect and support the health and safety of everyone who works for or with us, everywhere we operate. A healthy and safe workplace isn't only about preventing accidents.

We offer and maintain a healthy and safe working environment that meets or exceeds global standards and national legislation.

We strive to support employees' right to health and make efforts to ensure that employees can perform at their best in their everyday tasks. A healthy workplace, good work-life balance and flexible ways of working are key aspects for achieving this.

We continuously measure the experienced work-life balance among our employees. Our intention is for everyone who works at Telia to have the possibility to combine their work with their private lives.

17. Travel

Definitions

Business travel is defined as any travel that is taken for business purposes rather than for leisure or as a regular part of the daily commute between home and work.

The Telia Way

In addition to representing a major company expense and time commitment, business travel also impacts the environment. For these reasons, it's important that we always question and assess whether a trip is needed prior to booking. Virtual meetings are always our first choice.

If business travel is required, we strive to conduct it in the most environmentally friendly and cost-effective manner. We use the Telia service provider agreements whenever possible and comply with the booking processes.

Our personal safety is of paramount importance while traveling, so we seek to understand travel risks and avoid journeying to high-risk countries. We prepare for our trips and familiarize ourselves with our destinations beforehand. In addition, we always stay alert while traveling so that we can act according to the situation.

Furthermore, we are careful with company documents and other sensitive information. Discussions, calls, documents and presentations can easily be overheard or read by others while traveling. Thus, we keep a low profile and

avoid divulging identifying details about Telia or mentioning the names of our colleagues or companies in conversations.

We acknowledge that other routines may apply for employees within editorial offices for journalistic and editorial purposes.



Section four:

We are a responsible TV media owner

Our TV/Media unit

At Telia, we are proud owners of a TV/Media unit that connects with viewers and users in the Nordic region through news, entertainment, sports and drama.

The unit operates as an independent mass media company protected by the fundamental laws on freedom of expression, freedom of the press and freedom of information. Its editorial work and publications are grounded in democracy, equality and human rights.

The responsible editors' exclusive and sole right to decide on any and all publications secures editorial independence. Moreover, the unit works according to the ethical rules of the press and is subject to legislation and systems of self-regulation.

It is fundamental to the TV/Media unit to always protect its sources.

Freedom of expression

Freedom of expression is at the core of our work at the TV/Media unit, as it protects editorial independence in everything we do and helps secure society's trust. Freedom of expression is protected by the constitutions of the countries where we operate.

The TV/Media unit operates in several different countries with various regulations on freedom of expression. In the Swedish constitution, the Fundamental Law on Freedom of Expression (Swedish: Yttrandefrihetsgrundlagen or YGL), is the strictest of these regulations and applies across our operations within the unit.

YGL is reflected in the way TV/Media structure and safeguard operations, processes, systems, offices and administration. In addition to honoring YGL, the TV/Media unit's different offices must adhere to the laws of freedom of expression in their respective countries. Furthermore, their editorial work must adhere to the established local codes of ethics for press, television and radio.

Editorial independence

Editorial independence is a cornerstone for maintaining trust and credibility as a publisher. All editorial content must be free and unbound from ties to, e.g., governments, public authorities, political parties, external financial power spheres and other organized social interests, as well as from Telia as an owner. Anyone who works outside of the mass media company must respect editorial independence. To secure and safeguard it, we have adopted the Group Policy – Media Owner Commitments.

Employees within TV/Media may in some cases require other routines and processes than what has been described in this Code due to journalistic and editorial considerations. These routines and processes are always handled with care and in accordance with the journalistic and editorial legal framework.





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