Group Instruction - Environment

1 PURPOSE

The purpose of this Group Instruction is to clarify how the requirements in the Group Policy - Environment shall be interpreted and implemented.

The Group Instruction is a binding document for Telia Company AB, its Subsidiaries and its Joint Operations (“Telia Company”) and their employees.

2 OBJECTIVES AND REQUIREMENTS

2.1 Compliance with legal and other relevant requirements

Objective

Telia Company follows all applicable, domestic and international laws and regulations in the countries where it operates, as well as other relevant national and international frameworks.

Requirement 1

The company shall on a regular basis carry out legal reviews and follow up on gaps between current management practices and legal requirements to ensure that all applicable laws and regulations are met.

Requirement 2

The company shall on a regular basis ensure that it has up to date information on applicable laws, regulations and other relevant national and international frameworks, and knowledge on how these apply to the company.

2.2 Precautionary approach

Objective

Telia Company supports a precautionary approach in its operations and throughout its value chain.

Requirement 1

The company shall ensure that products, equipment, services etc. being purchased or contracted do not contain substances listed on the "Telia Company banned and restricted substances" instruction.

Note:

If suppliers use such substances which are under monitoring, the supplier is expected to evaluate when and how these can be replaced with substances that are not restricted or monitored and share the plan with Telia Company.
2.3 Consistent and structured management approach

Objective

Telia Company applies a structured management approach, based on continuous improvement, meaning target setting, monitoring, measuring, and evaluating impacts and risks, to minimize its negative environmental impacts.

Requirement 1

Each company shall have a documented environmental management system (EMS) in place, covering the entire organization.

Note:

The EMS shall fulfill all requirements in the ISO14001 or ISO50001 standard or equivalent. The scope of external certification is agreed between the company and the Group Environmental Manager.

Requirement 2

The company shall have an appointed function and individual role responsible for implementation and management of the EMS. Sufficient resources shall be allocated and available at all times.

The following exception applies:

- Companies with less than 100 employees are not required to implement an EMS, but need to regularly assess its environmental impacts, take reasonable action to manage it, and upon request report its environmental impact (e.g. energy consumption and waste) to the Group Environmental Manager.

2.4 Promoting circularity

Objective

Telia Company promotes circularity by applying the principle of Reduce, Reuse, Recycle in its own operations and in customer offerings.

Requirement 1

The company shall have a system in place for collection, including a buy-back program, and end of life treatment of customer and employee devices and other relevant equipment.

Note:

This includes shops and other channels, as well as from business customers.

Requirement 2

The company shall have a system in place for re-use of network equipment.

Note:
If feasible, re-use of network equipment should be first option, recycling second.

**Requirement 3**

The company shall only contract ISO 14001 or equivalent certified suppliers for buy-back, re-use and recycling.

### 2.5 Environmentally friendly technology, products, services and suppliers

**Objective**

Telia Company develops, uses and promotes environmentally friendly technology, products and services in its operations and throughout its value chain, and prioritizes suppliers and partners with similar objectives.

**Requirement 1**

The company shall evaluate the environmental life cycle impacts of relevant investments, products and services, and take reasonable action to reduce negative environmental impact.

**Note:**

This means looking for opportunities to help our customers to reduce their environmental impact. Looking at, for example but not limited to environmental impacts during production, transport, use, and end of life treatment. Environmental impacts could include total energy consumption, GHG emissions, possible product re-use and material recycling.

**Requirement 2**

The company shall prioritize using suppliers who apply an environmental life cycle impact approach on their products and services, and who actively take action towards reducing their negative environmental impacts.

**Requirement 3**

The company shall purchase electricity from renewable sources for the total electricity consumption of the company.

**Note:**

It must be possible to verify the source of the electricity, through a direct power purchase agreement or certificates of “Guarantee of Origin”. The total consumption includes co-location consumption.

**Requirement 4**
The company shall actively consider installing renewable energy generation capacity (solar, wind) where feasible.

**Note:**
Feasibility shall be evaluated for all parts of the operations, e.g. base stations, office premises and production sites/data centers.

**Requirement 5**

The company shall utilize Telia Company internal best practice technology, planning and solutions with regards to energy efficiency and other relevant environmental impact.

**Note:**
This includes interior design, cooling solutions, and reuse of waste heat from datacenters.

**Requirement 6**

The company shall keep travel to a minimum and favor environmentally friendly modes and practices of meeting and travel.

**Note:**
This company shall actively work towards replacing travel that cause GHG emissions with:

- Remote meeting services such as skype and video-conferencing
- Other modes of travel that cause less emissions, such as public transport.

2.6 Research and knowledge sharing

**Objective**

Telia Company engages in research, knowledge sharing and public policy development with relevant stakeholders on topics that promote environmental responsibility.

**Requirement 1**

The company shall engage with stakeholders in relevant channels (e.g. shops, website, social media) to increase their knowledge of how the company’s products and services contribute positively to the customers’ environmental impact.

**Requirement 2**

The company shall engage with stakeholders regarding opportunities in research, knowledge sharing, product development etc. on topics related to ICT and environmental responsibility.

**Note:**
Prioritized areas are energy efficiency, greenhouse gas emissions, circularity and electronic waste.

**Requirement 3**

The company shall participate in relevant industry organizations and support public policy development on topics related to ICT and environmental responsibility.

### 2.7 Reporting and communication

**Objective**

Telia Company communicates its most material environmental performance in a transparent, reliable and timely manner.

**Requirement 1**

The company shall establish SMART (Specific, Measurable, Achievable, Relevant, Timely) targets within the EMS.

**Note:**

These targets shall be related to the key environmental impacts and Telia Company long-term ambitions and goals.

**Requirement 2**

The company shall ensure that environmental data and other information reported to the Annual and Sustainability Report is timely, accurate and can be externally assured.

**Requirement 3**

The company shall regularly report environmental performance to its employees, management and externally.

The above requirements apply to the extent that they do not place Telia Company in violation of domestic laws and regulations.

### 3 BREACHES AGAINST THE INSTRUCTION - SPEAK-UP LINE

Any Telia Company employee who suspects violations of the Code of Responsible Business Conduct or this Group Instruction must speak up and raise the issue primarily to their line manager, and secondly to the Human Resources department, to the Ethics and Compliance Office, or through the Speak-Up Line. The Speak-Up Line is available on Telia Company’s internal and external webpages.
Telia Company expressly forbids any form of retaliation. For specific requirements, please see our Group Instruction on Internal Reporting and Non-Retaliation.

Violations against the Group Instruction can lead to disciplinary action, up to and including termination.

4 TARGET GROUP
This Group Instruction is mainly relevant for the following target groups:

- People & Brand
- Sustainability
- Sourcing
- Ethics and Compliance
- Consultants and contingent workers working for or on behalf of Telia Company when the Instruction applies to their area of work responsibility.

5 TERMS AND ABBREVIATIONS

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<thead>
<tr>
<th>Terms and abbreviations</th>
<th>Description</th>
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<tr>
<td>Continuous improvement</td>
<td>Using environmental management system to improve company’s environmental performance consistent with the environmental policy, making progress over time.</td>
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| EMS                                      | Environmental Management System - A structured management approach to manage company’s environmental impacts, compliance obligations and, including value chain. Consisting of five key elements:  
  - Scope and Environmental policy  
  - Planning  
  - Support and operations  
  - Performance evaluation  
  - Improvement |
| EnMS                                     | Energy Management System – Part of a management system used to manage company’s energy topics                                               |
| Environmentally friendly technology      | Technology that either:  
  - Is less negative compared to another technology with regard to environmental impact (for example more energy efficient),  
  or                                                                                                         |
NOTE! For further information, also read the Group Policy – Environment, Instruction - Telia Company banned and restricted substances and the Supplier Code of Conduct.