

**Owner**  
Cecilia Lundin, Head of People & Brand

**Approval Date**  
11/03/2020

**No.**  
T 147-17 Uen

**Version**  
2

**Security**  
Public

**Approved by**  
Board of Directors

**Related**  
50087276

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## Group Policy - Human Rights

### 1 PURPOSE

The purpose of the Human Rights Policy is to outline Telia Company's commitment<sup>1</sup> to respect and support Human Rights of all people affected by our business throughout societies where we operate. The policy sets out Telia Company's endeavor to engage proactively with business partners, governments and other stakeholders to uphold the highest standards of human rights throughout the value chain.

The Human Rights Policy is based on internationally recognized human rights outlined in the following documents: International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the principles concerning fundamental rights in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work and, where applicable, additional standards relating to the rights of specific groups and populations. When a conflict arises between domestic regulations and these international laws, Telia will always strive to meet the higher standard.

This Policy reflects the responsibility of Telia Company to respect human rights and to make sure it avoids and is not complicit in human rights abuses, as set down in the UN Guiding Principles on Business and Human Rights and other international standards such as the OECD Guidelines for Multinational Enterprises as well as the UN Global Compact signed by Telia Company.

### 2 PRINCIPLES

#### Commitments and expectations

While governments bear the ultimate duty to protect human rights, Telia Company recognizes its responsibility to respect and support human rights in all its business operations. Telia Company also endeavors to find opportunities to engage and use our leverage in our business relationships to proactively respect and support human rights.

Telia Company will strive to avoid complicity in human rights violations and will seek to provide for or cooperate in their remediation. We strive to promote and ensure channels for transparent and open communication where all internal and external stakeholders can raise concerns without fear of retaliation or reprisal and to provide fair investigation and grievance mechanisms.

Telia Company supports its employees and partners in understanding Human Rights through relevant communication and training.

We commit to human rights due diligence, an ongoing risk management process, in order to identify, prevent, mitigate and account for how we address adverse human rights impacts as well as to identify

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<sup>1</sup> Telia Company is through its statement of materiality and significant audiences committed to a number of international guidelines on human rights, labor rights, anti-corruption and environmental responsibility - <https://annualreports.teliacompany.com/en/2017/governance/statement-of-materiality-and-significant-audiences/>



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opportunities in our business operations to support human rights. Telia Company will continuously engage with stakeholders to understand potential and actual human rights impacts.

Telia Company will commit to respect and support all human rights in scope of the international standards outlined above. We will focus on human rights that are at risk of the most severe negative impact and the most relevant to our industry and business operations. These risks are identified by on-going due diligence and more in-depth Human Rights Impact Assessments (HRIA's) carried out in Telia Company as appropriate. Most relevant and material are; Anti-discrimination, Children's Rights, Freedom of Expression, Freedom of the Media, Labor Rights, Gender Equality, and Privacy.

Moreover, there are additional areas with human rights implications, such as anti-bribery and corruption, environment, and sanctions.

### **Children's rights**

Telia Company commits to recognize, respect and support children's rights, based on the UN Global Compact Children's Rights and Business Principles. We employ zero tolerance towards child labor, abuse and exploitation throughout our operations and value chain and seek to ensure adequate remediation insofar as such maltreatment is discovered. As a telecommunications company, we recognize our obligation to protect children by volunteering blocking access for our customers to material defined by law enforcement to contain child sexual abuse material.

As a telecommunications company, we recognize our obligation to empower children and their parents and caretakers according to children's rights, as they are set forth in the Global Compact Children's Rights and Business Principles. We also recognize our obligation to protect children from harm and hence do our utmost to advance our processes and employees to be able to secure this obligation of ours through various tailor-made monitoring mechanisms.

### **Other policy commitments**

Telia Company's commitments to Anti-Bribery and Corruption, Customer Privacy, Non-discrimination equal opportunity and diversity, Freedom of Expression and Surveillance Privacy, Labor Rights, and Trade Sanctions and Export Controls are outlined in detail in the following policies and instructions:

- Group Policy - Anti-bribery and Corruption
- Group Policy - Freedom of Expression & Surveillance Privacy
- Group Instruction – Occupational Health and Safety
- Group Policy - People
- Group Policy - Privacy and Data Protection
- Telia Company Supplier Code of Conduct
- Group Instruction – Trade Sanctions and Export Control

These principles apply to the extent that they do not place Telia Company in violation of domestic laws and regulations.

Please note that there is a Group Instruction - Speak Up and Non-Retaliation.



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### 3 ROLES AND RESPONSIBILITIES

This Group Policy applies to Telia Company AB and its Subsidiaries<sup>2</sup> and Joint Operations<sup>3</sup> as their own binding policy to all directors, members of the boards, officers and employees. In addition, Telia Company works towards promoting and adopting this Policy's principles and objectives in other associated companies where Telia Company does not have control but has significant influence.

Each Group Executive reporting to the CEO of Telia Company is responsible for ensuring that this Group Policy is duly communicated and implemented, and that the employees within his/her area of responsibility are familiar with and follow this Group Policy.

Each country CEO is responsible for ensuring that all relevant entities within the CEO's geographic location has adopted and implemented this Group Policy.

### 4 BREACHES AGAINST THE POLICY

Any Telia Company employee who suspects violations of the Code of Responsible Business Conduct or this Group Policy 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 people who speak up. For specific requirements, please see our Group Instruction on Internal Reporting and Non-Retaliation.

Violations against this Group Policy can lead to disciplinary action, up to and including termination.

### 5 TARGET GROUP

This Group Policy is applicable and most relevant for personnel within;

- CEO's
- Ethics and Compliance
- Legal
- People & Brand
- Risk management
- Security
- Sourcing
- Sustainability
- Consultants and contingent workers working for or on behalf of Telia Company when the Policy applies to their area of work responsibility

### 6 EXEMPTIONS

A Subsidiary-specific corresponding policy shall be compliant with this Group Policy while adapting to the concerned business activities, local laws, local circumstances and language. If a deviation or exemption from this Group Policy is deemed necessary, the Country CEO shall escalate the matter to the Group

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<sup>2</sup> All entities over which Telia Company AB has majority control.

<sup>3</sup> The joint operations over which Telia Company AB has joint control and management responsibility.



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General Counsel.

## 7 GROUP GOVERNANCE FRAMEWORK

This Group Policy is part of the Group Governance Framework, which includes without limitation:

- a) Code of Responsible Business Conduct, Purpose and Values, Strategy, Group Policies, and Instructions for the CEO as approved by the Board of Directors;
- b) Decisions made by the CEO, the Delegation of Obligations and Authority as approved by the CEO, Group Instructions as approved by the CEO or by the responsible Head of Group Function; and
- c) Guidelines, best practices, process descriptions, templates or working routines developed within the area of responsibility of Head of Group Function. equal and inalienable rights of all members of the human family

## 8 TERMS AND ABBREVIATIONS

Terms and abbreviations	Definition
Human Rights	Equal and inalienable rights of all members of the human family.
Human Rights Due Diligence	A company's ongoing risk management process to identify, prevent, evaluate, mitigate and account for how to address adverse human rights risks that are implicated by its products, services, activities and operations. It includes four key steps: assessing actual and potential human rights impacts, integrating and acting on the findings, tracking responses and communicating about how impacts are addressed.
Human Rights Impact Assessment	Assessments performed as Human Rights Due Diligence identifies circumstances when human rights may be jeopardized or advanced.

**NOTE!** For further information, also read the Group Instruction - *Speak Up and Non-Retaliation*.

