

**Owner**  
Head of Corporate Affairs

**Security**  
Public

**Approval Date**  
2023-03-08

**Version**  
3

**Approved by**  
Board of Directors

**No.**  
CSS0000907728

**Related**  
50087276

## Group Policy – Media Owner Commitments

Independent journalism supports and enables an open and democratic society.

### 1 PURPOSE

Telia Company owns media operations characterized as mass media. As to this mass media, this Policy defines Telia Company's commitments in relation to a free flow of information, freedom of expression, freedom and independence of mass media and an open and democratic society.

Telia Company has adopted these principles to define our commitments to promote and defend independent publishing and broadcasting with the responsible editorship as a cornerstone. Our media operations shall independently portray a multitude of voices.

As media owner, we confirm that all mass media content shall be protected by traditional editorial integrity principles, established journalistic practices and the sovereignty of the responsible publisher pursuant to constitutional law regarding freedom of expression.

### 2 PRINCIPLES

In our capacity as media owner we will apply the following commitments for the activities under this Group Policy.

1. We commit and recognize that;

- The freedom to hold opinions shall be without interference and include the right to seek, receive, impart and publish/broadcast information and ideas through any media and regardless of frontiers;
- The editorial content shall be free from ties to e.g. governments, public authorities, political parties, external financial power spheres and other organized social interests; and that
- A multitude of voices and perspectives shall be reflected in our mass media.

2. All editorial decisions are solely taken by personnel within the editorial operations which are separate from other parts of Telia Company. This guarantees that independent publishing is upheld vis-à-vis the owners, board and management of Telia Company.

3. Our editorial work adheres, in addition to applicable local legislation, to established local codes of ethics for press, television and radio.



**Owner**  
Head of Corporate Affairs

**Security**  
Public

**Approval Date**  
2023-03-08

**Version**  
3

**Approved by**  
Board of Directors

**No.**  
CSS0000907728

**Related**  
50087276

---

4. We respect;

- The professional secrecy of mass media including the confidentiality of sources and the integrity and confidentiality of editorial work and decisions;
- That editorial staff and personnel associated with such operations cannot be asked to disclose information that jeopardizes the professional secrecy; and
- That staff in editorial operations is not to receive editorial related instructions from individuals, entities etc. outside the editorial operations.

### **3 ROLES AND RESPONSIBILITIES**

This Group Policy applies to Telia Company AB and its Subsidiaries<sup>1</sup> and Joint Operations<sup>2</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 their 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 Conduct or this Group Policy must speak up and raise the issue primarily to their line manager, managers manager, People Partner or Ethics & Compliance Officer, 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;
- Communications;
- Editorial operations;

---

<sup>1</sup> All entities over which Telia Company AB has majority control.

<sup>2</sup> The joint operations over which Telia Company AB has joint control and management responsibility.



**Owner**  
Head of Corporate Affairs**Security**  
Public**Approval Date**  
2023-03-08**Version**  
3**Approved by**  
Board of Directors**No.**  
CSS0000907728**Related**  
50087276

- Governance, Risk and Compliance;
- Legal;
- Risk; and
- Sustainability.

## 6 EXEMPTIONS

If a deviation or exemption from this Group Policy is deemed necessary, the Country CEO or Head of Group function shall escalate the matter to the Group General Counsel and the Document owner jointly. The exemption shall be documented, and a prior written approval must be given.

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.

## 7 GROUP GOVERNANCE FRAMEWORK

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

- a) Code of 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.

