Group Instruction - Occupational Health, Safety and Well-being

1 PURPOSE

This Group Instruction is related to, and aligned with, the Group Policy - People with the requirements on occupational health, safety and well-being. This instruction presents mandatory principles and describes how the Group Policy is applied in detail for this part.

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

The protection and improvement of the health, safety and well-being of everyone who works for or with Telia Company, is a guiding principle in all our operations. This definition includes our employees, contractors, suppliers and visitors.

Our common approach is built on promoting good health, well-being and safe work conditions, preventing occupational risks and ill health, and rapidly reacting to injuries and unsafe conditions. This applies to both physical and psycho-social work aspects.

2 OBJECTIVES AND REQUIREMENTS

2.1 Consistent and structured management approach

Objective

We apply a consistent and structured management approach to manage occupational health, safety and well-being.

Requirement 1

The company shall have a documented occupational health and safety management system (OHS) based on continuous improvement in place, covering the entire organisation.

Note:

The management system shall cover all requirements of the OHSAS18001 / ISO45001 standard.

Requirement 2

The company shall have an appointed function responsible, with sufficient resources, for implementation and management of the OHS.

The following exception apply:

- Companies with less than 100 employees are not required to implement a management system based on OHSAS18001/ISO45001, but need to follow the legal requirements, regularly assess its health and safety processes, take reasonable action to manage it and upon request report on health, safety and well-being.
Requirement 3
Group Executive Management team and country GREC’s review progress and status of occupational health, safety and well-being in set intervals.

Requirement 4
The company shall on regular basis carry out legal reviews and follow up on gaps between current management practices and legal requirement to ensure that all applicable laws and regulations are met.

2.2 Risk approach

Objective
We conduct risk assessments systematically.

Requirement 1
The company shall implement an effective risk assessment procedure to cover health, safety and well-being risks and opportunities.

Note:
The assessment shall cover not only physical risks but also include psycho-social risks. The risk assessment shall cover all employees, including visitors, contractors and other relevant suppliers.

Requirement 2
The company shall provide for its employees all relevant control measures and appropriate personal protective equipment, as well as access to prevention and protection devices.

2.3 Our people are the core of our strategy

Telia Company considers employees as its most important resource and focuses on health and well-being. Health and well-being of our employees creates the foundation for a great employee experience. A healthy and safe work environment is a responsibility of everybody.

Objective
Well-being is a resource for the individual and for the company.

Requirement 1
The company shall create and implement tools and resources to enable employees to meet personal goals and to help create engagement.

Requirement 2
The company shall implement procedures for all employees to participate in the healthy and safe work environment development.

2.4 Emergency preparedness

Objective
We keep all needed emergency preparedness procedures up to date.
Requirement 1
Companies shall identify and respond to potential emergency situations by having in place adequate and appropriate measures.

Requirement 2
Employees shall be informed how to act in case of emergency and training on evacuation, emergency responsiveness as well as medical care shall take place.

2.5 Monitoring

Objective
We regularly measure, follow up our performance in a transparent, reliable and timely manner.

Requirement 1
The company shall establish SMART (Specific, Measurable, Achievable, Relevant, Timely) targets within health and well-being.

Note:
These targets shall be aligned with the Group occupational health, safety and well-being targets.

Requirement 2
The company shall ensure that occupational health, safety and well-being data and other information reported to the Telia Company official reporting is timely, accurate and can be externally assured.

Note:
At minimum the reporting includes fatalities, SAR, LTIF and employee engagement.

Requirement 3
The company has necessary systems in place to report, record and investigate all incidents.

2.6 Supplier OHS management

Aligned with international standards for OHS, the contractor commits to provide and maintain a safe and healthy workplace for its employees, visitors, suppliers and any subcontractors working on its behalf.

Objective
We follow and improve in co-operation with our suppliers the management of occupational health and safety in our supply chain.

Requirement 1
Supplier Code of Conduct is part of Telia Company supplier agreements.

Requirement 2
Based on health and safety risk assessment the company shall request selected suppliers to report on their health and safety status and activities.
Note:
Reporting shall include among other information fatalities, lost-time injuries, near misses and corrective actions taken and planned improvement actions.

3 THE HEALTH AND WELL-BEING NETWORK
The network of health and well-being experts in our companies is led by People and Brand - Sustainability Group Function. The network supports the Policy’s implementation and shares best practices to benefit the whole Group.

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

4 ROLES AND RESPONSIBILITIES
This Group Instruction applies to Telia Company AB and its Subsidiaries\(^1\) and Joint Operations\(^2\) as their own binding instruction to all directors, members of the boards, officers and employees. In addition, Telia Company works towards promoting and adopting this instruction’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 Instruction is duly communicated and implemented, and that the employees within his/her area of responsibility are familiar with and follow this Group Instruction.

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

5 BREACHES AGAINST THE INSTRUCTION
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 Speak Up and Non-Retaliation.

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

\(^1\) All entities over which Telia Company AB has majority control.
\(^2\) The joint operations over which Telia Company AB has joint control and management responsibility.
GROUP INSTRUCTION

Owner
Anne Larilahti, People & Brand

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Version
4

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GROUP GOVERNANCE FRAMEWORK
This Group Instruction 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 area of responsibility of Head of Group Function.

TERMS AND ABBREVIATIONS

<table>
<thead>
<tr>
<th>Terms and abbreviations</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>OHS</td>
<td>Occupational Health and Safety</td>
</tr>
<tr>
<td>OHSAS18001</td>
<td>Occupational Health and Safety Assessment Series</td>
</tr>
<tr>
<td>ISO45001</td>
<td>International Organization of Standardization Occupational Health and Safety Management System</td>
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<tr>
<td>SAR</td>
<td>Sickness absence rate</td>
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<td>LTIF</td>
<td>Lost Time Injury Frequency</td>
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NOTE! For further information, also read the Group Policy – People and the Supplier Code of Conduct.