

Owner
Head of Group Communications

Approval Date **Version**
2019-03-13 3

No.
T 16923-11 Uen

Security
Public

Approved by
Board of Directors

Related
50087277

GROUP POLICY – COMMUNICATION

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POLICY

This Group Policy is related to Communications and is a binding document for Telia Company AB and its Subsidiaries ("Telia Company").

The principles stated in this Group Policy cover external and internal communication to make sure it is performed in a coordinated, efficient and professional manner. These principles apply to the extent that they do not place Telia Company in violation of domestic laws and regulations.

PRINCIPLES

General communication principles

Telia Company's communication should be proactive, transparent, straightforward, relevant and service-minded towards all stakeholders, i.e. customers, employees, suppliers and partners, the public, media and the financial markets. All communication should reflect Telia Company's shared values and create a strong, unified brand image.

All information should be provided in accordance with the laws, as well as the rules and established practices governing companies listed on the stock exchange.

An employee of Telia Company should be aware that all types of communication influence the perception and image of Telia Company and therefore also the future development of the company.

The following principles shall apply for the activities under this Group Policy:

External communication

- Media Relations
 - o Media Relations on behalf of the company are coordinated by the Head of Group Communications or by persons specifically appointed by the CEO or Head of Group Communications. Corporate messages to media shall be coordinated in order to make sure they are in line with the company's overall strategy and message planning.
- Investor Relations
 - o Share price sensitive or in other ways sensitive information may only be disclosed to the public, financial markets and media by the CEO, CFO, the Head of Group Communications, Head of Investor Relations or others with expressed authority from the persons mentioned above.
 - o Share price sensitive information may include financial and other forecasts; changes to the company's strategy; major investment decisions; acquisitions and divestitures; restructuring initiatives; the effect of regulatory changes; volume or sales related information; changes in Group Management; major customer contracts etc.

Internal communication

- Internal communication aims at strengthening the motivation, commitment, loyalty and responsibility among the employees. Communication is a strategic management tool and leadership responsibility. Managers are responsible for keeping an open dialogue with their own employees and with other parts of the company.

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- Telia Company employees are responsible for keeping themselves informed about issues relevant to their work.
- All internal communication to a wider group of employees shall be considered to be public and therefore handled with care. Internal information which may be share price sensitive or in other ways sensitive should always be planned and approved by the Head of Group Communications or IR (see Investor Relations).

These principles apply as long as they do not violate domestic laws and regulations.

PURPOSE

The purpose of this Group Policy is to inform how communication shall be done in Telia Company and that it is accurate and provided in a professional and timely manner.

This Group Policy covers all forms of oral and written communication. It applies to all Telia Company employees.

ROLES AND RESPONSIBILITIES

This Group Policy applies to Telia Company AB and its Subsidiaries¹ and Joint Operations² 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.

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 - Speak Up and Non-Retaliation.

Violations against this Group Policy 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.

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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 General Counsel.

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.