

Owner  
Peter BorsosApproval Date  
2019-03-13No.  
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PublicApproved by  
Board of DirectorsRelated  
50087277**GROUP POLICY - FREEDOM OF EXPRESSION AND SURVEILLANCE PRIVACY****FREEDOM OF EXPRESSION AND SURVEILLANCE PRIVACY POLICY**

This Policy defines Telia Company's commitments in relation to requests or demands that potentially could seriously impact the freedom of expression and surveillance privacy of our users.

Such requests or demands addressed to Telia Company may relate to such as;

- targeted surveillance in exceptional cases
- mass surveillance, where the authorities demand unrestricted real-time network access
- shutdown of all or parts of a network
- blocking or restricting access to specific services, Internet websites or content
- blocking or restricting individual customers' access to services or networks
- obligations to transmit mandatory communications issued by the government authorities
- significant changes or proposed changes in the law, or significant imposed or proposed operational changes, in the context of freedom of expression in telecommunications

In this Policy document, the umbrella term "surveillance of communications" is used to cover all these activities.

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

**A. Public advocacy, primarily by Local and Group management, promoting freedom of expression and surveillance privacy**

1. We advocate clear and transparent legal provisions on proportionality and necessity for all government surveillance of communications. Vague, non-transparent and broadly conceived legal provisions are not appropriate when freedom of expression and surveillance privacy is at stake.
2. We argue that all government surveillance of communications, including international collaboration between authorities, should be conducted under the supervision of a court or some other independent judicial body. This will help to ensure transparency and accountability in relation to requests or demands made by governments.
3. We advocate that governments should not have direct access to a company's networks and systems. The company should retain operational and technical control.
4. We will encourage governments to be transparent about their use and scope of surveillance of communications. We will report transparently on Telia Company's efforts in relation to surveillance of communications. We will inform stakeholders about unconventional requests ('major events') whenever this is appropriate and within what is legally permissible.

**B. Commitments in relation to unconventional requests and demands with potentially serious impacts on freedom of expression and surveillance privacy**

5. We always strive to act in the best interest of our customers and the company. Risks to customers, including children and youth, relating to freedom of expression and surveillance privacy



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are integrated into our risk management processes to minimize possible negative impacts of government requests or demands.

6. We will comply with requests or demands relating to the surveillance of communications only to the extent required by law, including binding regulations and license requirements. We will also argue that all such requests or demands are submitted in writing and are signed by the appropriate government official.

7. We will enhance internal decision making to efficiently determine whether a request or demand could be in conflict with international standards of human rights because of serious impacts on freedom of expression and surveillance privacy. Where such impacts seem to exist, we will pursue all available lawful and feasible measures to avoid compliance, and/or minimize any negative impacts on the freedom of expression. If in doubt, we will always treat requests or demands as potentially having serious impacts on freedom of expression. Whenever governments demand real-time network access, we will make high-level reviews (e.g. at Group CEO level). We will also regularly review existing demands regarding real-time network access.

8. We will define clear criteria, processes and responsibilities for assessing and determining the likelihood and seriousness of impacts on freedom of expression and surveillance privacy whenever we receive requests or demands relating to the surveillance of communications. We will provide guidance for the relevant personnel explaining how they should interpret and react to such requests or demands. We will also conduct training on such issues for staff within key functions and for our technical specialists. We will prioritize awareness raising and training in national contexts, where risks to freedom of expression are most severe. These criteria, guidance and training processes will be regularly reviewed.

9. We will always prioritize the safety and liberty of company personnel who can be put at risk when applying this Policy.

### **C. Other commitments**

10. We will actively seek to provide products and services that can contribute to our customers' freedom of expression and surveillance privacy.

11. We will engage actively with other companies and other stakeholders to share our experiences and identify best practices in our field, as well as utilizing guidance from the UN, the EU and other supranational organizations. We will also strive to provide accessible, secure and independent grievance mechanisms.

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 connected to this Group Policy.



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## PURPOSE

Telia Company has adopted these principles to define our standards for respecting and promoting the freedom of expression and surveillance privacy of our users.

Companies should comply with all applicable laws and also have a responsibility to respect internationally recognized human rights, wherever they operate. If national laws, regulations and policies do not conform to international standards, companies should avoid, minimize, or otherwise address the adverse impact of government demands, laws, or regulations, and seek ways to honor the principles of internationally recognized human rights to the greatest extent possible. Companies should also be able to demonstrate their efforts in this regard.

Telia Company does not engage in the politics of the countries where we operate. We do not comment on politics or make political statements when representing our company. However, Telia Company does engage in dialogue on regulations that affect our business. Telia Company has therefore adopted these principles when encountering requests or demands with potentially serious impacts on freedom of expression and surveillance privacy.

Telia Company supports international standards on human rights. Our principles are based on internationally recognized laws and standards for human rights, including the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR). The application of these Principles is informed by the UN Guiding Principles on Business and Human Rights (UN Guiding Principles) and the OECD Guidelines for Multinational Enterprises.

Freedom of expression and surveillance privacy are fundamental human rights derived from the inherent dignity of all persons.

The primary purposes of this Policy are to reduce human rights risks, and to make sure our customers feel confident that Telia Company will, whenever possible, support, respect and safeguard their freedom of expression and surveillance privacy when we receive requests or demands from governments in relation to the surveillance of communications.

Through this Policy we aim to anticipate, address and minimize any potential impacts on freedom of expression and surveillance privacy that may arise when governments make requests or demands that are unlawful, or where governments or national authorities are believed to be misusing products or technology in violation of the human right to freedom of expression and surveillance privacy.

## ROLES AND RESPONSIBILITIES

This Group Policy relates to freedom of expression and surveillance privacy and 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.

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<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.



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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.

### **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.

