

Owner
Cecilia Lundin, Head of People & Brand

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2019-03-13 1

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Group Policy - Human Rights



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POLICY – HUMAN RIGHTS

The Group Policy - Human Rights sets out Telia Company's commitments to respect and support Human Rights and outlines fundamental principles to be implemented in our operations. We expect all Telia Company employees to follow this policy and consistently apply its standards in all business dealings. We will strive to fully adopt these principles in all operations in which Telia Company has management control. We will 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 reflects the responsibility of Telia Company to respect human rights, 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 signatories to the UN Global Compact, Telia Company has committed to respect and promote human rights and to make sure it is not complicit in human rights abuses.

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.

Commitment 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 areas and operations. Telia Company also endeavors to find opportunities to engage and use our leverage in our business relationships to proactively support human rights in all communities where we operate.

Telia Company will strive to avoid complicity in human rights abuse and 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 communication and training.

We commit to conducting human rights due diligence process in order to identify and manage human rights risks and opportunities in our business operations.



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Telia Company will commit to respect all human rights in scope of the international standards outlined above, however, for the purpose of this policy, 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, as supported by Human Rights Impact Assessments (HRIA) carried out in Telia Company, namely; Anti-Bribery and Corruption, Children's Rights, Customer Privacy, Diversity and Anti-discrimination, Freedom of Expression and Surveillance Privacy, Gender Equality and Labor Rights.

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, Diversity and Anti-discrimination, Freedom of Expression and Surveillance Privacy, Gender Equality and Labour Rights are outlined in detail in the following policies:

- Group Policy - Anti-Bribery and Corruption
- Group Policy - Customer Privacy
- Group Policy - Freedom of Expression and Surveillance Privacy
- Group Policy - People
- Group Policy - Procurement

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 on Human Rights Grievance Mechanism connected to this Group Policy.



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PURPOSE

The purpose of the Human Rights Policy is to outline Telia Company's commitment 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.

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.

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:

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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- 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.

