

**Owner**  
Cecilia Lundin, Head of People and Brand

**Approval Date**  
2019-03-13

**No.**  
T 2232-15 UEN

**Version**  
4

**Security**  
Public

**Approved by**  
Board of Directors

**Related**  
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## Group Policy - People

### 1 PURPOSE

Telia Company's most valuable resource is our people. We strive to have the most engaged employees. Without our ability to identify, hire and retain the best people, we would lose some of our unique culture and competitive edge.

This Policy defines the Company's expectations of the employees as well as what expectations our employees shall have of each other and on us as their employer. This policy does not form part of any employee's contract of employment and may change from time to time at the discretion of the Company.

### 2 PRINCIPLES

This Policy covers the following areas:

- Addictive substances
- Child labor and forced labor
- Disclosure of conflicting interests
- Freedom of association and collective bargaining
- Integrity
- Non-discrimination, equal opportunity and diversity
- Occupational health, safety and well-being
- Recruitment
- Terms of employment and working hours
- Total remuneration
- Travel

The Code of Responsible Business Conduct lays out basic expectations on employees. Telia Company is committed to a number of international principles and frameworks such as the UN Guiding Principles on Business and Human Rights, the ILO Core Conventions and the Children's Rights and Business Principles. Employees are, at all times, expected to respect these commitments.

#### ***Addictive substances***

Telia Company does not accept any form of use or possession of illegal or unauthorized drugs in the workplace. It is forbidden to be at the workplace or perform work while under the influence of alcohol or drugs.

Employees using medicine or any other measure, which could cause an adverse impact on the health and safety of the employee or any other employee, shall inform their manager in order to discuss making any necessary reasonable adjustments.



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Alcohol in connection with workplace events, business trips and representation shall be consumed with restraint and sound judgment. Employees shall not operate vehicles under the influence of alcohol or drugs.

To maintain a smoke-free work environment, smoking is allowed only in designated areas.

### ***Child labor and forced labor***

Child labor is not accepted in any of Telia Company's operations or at our suppliers or sub-suppliers. Under no circumstance will we employ anyone below the age of 15 (or the country's legal minimum age, if over 15). Young employees ages 15-18 shall be shown extra consideration. Government-authorized job trainings or apprenticeship programs that are clearly beneficial to the participating individuals may be exceptions to the above.

Forced labor is not accepted in any of Telia Company's operations or at our suppliers or sub-suppliers. Employees are never required to deposit identity papers at the start of or during employment. Employees are free to leave their employment after a notice period, as required by law and contract.

### ***Disclosure of conflicting interests***

Employees shall not be involved in outside employment or business interests in potential or actual conflict with Telia Company's business unless agreed between the employee and the company. Employees facing a potential or actual conflict of interest situation shall discontinue it.

Employees shall disclose in writing, through their managers or provided processes and tools, details of any conflict of interest, which might affect their impartiality in carrying out their duties as soon as it becomes apparent. This includes:

- Any interest, shareholding or possible conflict of interest in a company or organization with which Telia Company has a business relation.
- Any outside employment or business interests in conflict or potentially in conflict with Telia Company's business.
- Any interest of an employee's immediate family which could result in a conflict of interest.

### ***Freedom of association and collective bargaining***

Employees have the right to form or join associations of their own choice concerning the relationship between the employer and the employees, and to collective bargaining. We do not accept any discrimination or disciplinary actions, which is based on an employee's choice to peacefully and lawfully organize or join an association. Employees are forbidden to use intimidations of any kind to obstruct other employees' right to freedom of association.



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### ***Integrity***

Employees shall act in a manner, which is appropriate to their position in the organization. They shall not act in a manner, which could disrepute Telia Company. Employees shall personally not be engaged in any illegal or criminal activities (inside or outside working hours).

### ***Non-discrimination, equal opportunity and diversity***

Telia Company promotes a culture of diversity and equal opportunity based on competence, experience and performance. All employees shall treat one another with respect, dignity and common courtesy. No employee shall be treated differently because of their gender, gender identity or expression, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background and/or other characteristics protected by applicable law. As part of our commitment to a diverse and inclusive workplace, we have zero tolerance against discrimination, victimization, harassment and bullying.

### ***Occupational health, safety and well-being***

Telia Company's health and well-being approach is built on **promoting** good health 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. We believe that accidents, incidents, injuries, work-related illnesses and unsafe acts and conditions are preventable. The objective is to make the health, safety and wellbeing culture part of all Telia Company employees' everyday work and to achieve compliance with this Policy in the company and, through the commitments and actions of our local suppliers, to affect the conditions in the country as a whole.

Our approach is based on ISO45001 compliance. We work for continuous improvement of workplace safety by eliminating hazards, preventing risks and reacting to conditions of ill-health and carrying out measures to promote health and well-being. We comply with relevant legislation and other requirements and require the same from our suppliers.

A healthy and safe work environment is the responsibility of everybody. Employees have a personal responsibility for their own health and are expected to contribute to a safe working environment. They are empowered to report or halt unsafe situations and make improvement proposals. Employees shall be aware of the safety standards and enforce them in the workplace. This includes completing provided training, reviewing communications and guidelines and ensuring that rules are followed. Managers at all levels have a particular responsibility for employee health and wellbeing at the workplace.

Health, safety and well-being activities are carried out locally based on this Policy and its related instructions.

Detailed guidance can be found in the Group Instruction - Occupational health, safety and well-being.



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## ***Recruitment***

Recruitments are an important investment for business success and for our employer brand. Our values Dare, Care and Simplify guide us how to act and behave in our daily work and we focus on attracting present and future employees who are experienced, competent and recognize themselves in our values. In addition, we want to attract and retain talents with a drive, in order to constantly improve and deliver the best value for Telia Company and our stakeholders.

The right competence, diversity and equal opportunity are all equally important factors when we recruit, both internally and externally. Recruitments are based on business needs and we care for respect for the individual no matter of age, gender, marital or parental status, color, religion, race, ethnicity, nationality, handicap, sexual orientation or political opinion. Selection processes are fair and based on objective and transparent criteria and include proper feedback to all applicants. Employees and potential future employees are offered equal access to the Telia Company Job market where we present job opportunities.

Detailed guidance can be found in the Group Instruction - Recruitment.

## ***Terms of employment and working hours***

Telia Company provides working conditions, which comply with local statutory requirements and collective bargaining agreements. Employees have the right to written contracts, in a language that they can easily understand, specifying their terms of employment.

Telia Company follows national legislation and collective bargaining agreements on working hours. We respect the employees' right to leisure time and a work-life balance.

## ***Total remuneration***

Remuneration is based on fairness and non-discrimination and regularly reviewed to ensure these principles.

Employees shall have clearly available and understandable information on their salary and benefits. Employees are provided understandable information in written about their employment conditions regarding salaries before they enter employment. Employees are provided details of their salaries for the given pay period each time they are paid.

Detailed guidance can be found in the Group Policy - Remuneration.

## ***Travel***

Business travel shall be conducted in the most reasonable, safe, cost-effective and environmentally friendly manner.



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Detailed guidance can be found in the Group Instruction - Travel and Expenses.

These principles apply to the extent that they do not place Telia Company in violation of domestic laws and regulations.

### **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 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.

### **4 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.

### **5 TARGET GROUP**

All employees and managers.

### **6 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.

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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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## 7 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.

## 8 TERMS AND ABBREVIATIONS

<b>Terms and abbreviations</b>	<b>Definition</b>
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Workforce	Managers, employees and consultants
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