

**Owner**  
Head of CPS, Magnus Zetterberg

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

**No.**  
T 20845-09 Uen

**Security**  
Public

**Approved by**  
Board of Directors

**Related**  
50078926

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## Group Policy - Security

### 1 PURPOSE

This is the Telia Company Group Security Policy, stating the mandatory security requirements for the group including subsidiaries and joint ventures.

Security measures shall be characterized by appropriate security and risk awareness, prevention, preparedness, and the ability to respond to, and recover from, incidents and changes in the environment. The main drivers for security are:

- Protection of shareholders' value and the company's assets and investments
- Ensuring that customers' expectations and business agreements are met
- Ensuring that the business strategies and objectives are not jeopardized due to security risks
- Ensuring that laws and regulatory security related requirements are complied with (legal compliance).

Security is an integral part of sound group governance. The governance of security within Telia Company is coordinated by Group Security in cooperation with all parts of the organization. It aims to control, facilitate and implement well-balanced security measures throughout our operation.

### 2 PRINCIPLES

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

- Telia Company shall implement security measures, which aims to balance risk exposure, business value, vulnerabilities and threats.
- To protect business and shareholder value, Telia Company shall implement security measures to protect assets such as personnel, customers, information, IT infrastructure, internal and public networks, as well as office buildings and technical facilities.
- Telia Company shall implement security measures to prevent and detect disclosure of sensitive information to unauthorized parties. Special attention shall be given to information affecting user privacy.
- Products, services, and key strategic and operational processes shall continuously, throughout its life cycle, undergo thorough analysis to identify risks and threats affecting our business. The analysis aims to guide decision making and ensure proper implementation of security measures to meet compliance and balance risk exposure.
- Telia Company shall not accept criminal activities or fraud. Appropriate measures, including data preservation, shall be in place to enable detection and prompt response to security incidents and fraud.
- All Telia Company employees and line managers shall be obligated to report security incidents and fraud according to established routines.



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- Telia Company shall ensure that critical business functions will be available to customers and other stakeholders. Business continuity plans shall be in place for all business-critical services to maintain service resilience and recoverability according to business, legal and regulatory demands.
- Telia Company shall establish a crisis management organization and corresponding plans at Group level and Countries, to ensure the ability to handle unpredictable events.
- Security audits (follow-ups) shall continuously be conducted to ensure implementation of corrective actions and compliance to group policies, instructions and legal/regulatory demands.
- These principles apply to the extent that they do not place Telia Company in violation of domestic laws and regulations.

*Note that there are Group Instructions and Group Guidelines connected to this Group Policy.*

### **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.

Non-compliance of the Group Security Policy shall be reported to the Chief Security Officer.

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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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## 5 TARGET GROUP

This Group Policy applies to Telia Company AB, its Subsidiaries and Joint Operations as their own binding policy. In addition, Telia Company works towards adopting this Policy's principles and objectives in all other operations in which Telia Company has ownership interests.

The Group Policy also applies to any third-party provider working under contract to any of above mentioned entities.

## 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.

## 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.
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