Note, October 2016:

**FORM FOR ASSESSMENTS AND ESCALATION - MAJOR FREEDOM OF EXPRESSION EVENTS**

 Contributing to best practice of shared learning, Telia Company hereby shares its internal tool (the below Form) developed for assessments and escalation of unconventional requests and demands with potentially serious impacts on freedom of expression in telecommunications, i.e. ‘major events’ as defined in the Telia Company Freedom of Expression Policy adopted in December 2013 and updated in September 2015.


Our purpose of sharing this tool is to support implementation and further development of industry best practice globally, to promote and respect freedom of expression in telecommunications, aiming for practical measures on the ground to support the freedom of expression of customers and users.

Within Telia Company, major events must be assessed and escalated in a way so that locally, regionally and group-wide Telia Company can seek ways to respect freedom of expression. The Form has been elaborated and updated during 2016 based on learnings from actual events.

Practical work based on the Policy, internal Instructions, processes as well as guidance (such as what has been built into this Form) is accompanied by continuous training and awareness building.

This Form is provided as Guidance for assessments and escalation.
Introduction

All requests and demands that could have potentially serious impacts on freedom of expression ¹ shall be assessed and escalated. Assessment and escalation processes are defined in the ‘Group Instruction - Freedom of Expression in Telecommunications’ ². As soon as information in this Form has been escalated, it may be used for decisions/recommendations by the respective Head of Region of Telia Company.³

The purpose of this Form is to assist the local Country CEO:

I. To assess whether a request or demand could have potentially serious impacts on freedom of expression and, if so,

II. To escalate the request or demand, together with the below information and assessments, within Telia Company with the aim to respect and support the freedom of expression of customers.

This Document also provides a short ‘Check-list’ when having received an unconventional request, see end of document.

Information on request or demand

| 1. Type of request⁴ | a) targeted surveillance in exceptional cases  
b) mass surveillance, where the authorities demand unrestricted real-time network access, e.g. SORM and similar (See ‘Note A’ below)  
c) shutdown of all or parts of a network  
d) blocking or restricting access to specific services, Internet websites or content  
e) blocking or restricting individual customers’ access to services or networks  
f) obligations to transmit mandatory communications issued by the government authorities (See ‘Note B’ below)  
g) proposals for new laws or significant imposed operational changes ⁵ (See ‘Note C’ below)  
h) other |
|-------------------|----------------------------------------------------------------------------------------------------------|
| 2. Request Date, Source⁵, Form⁶, If to all operators, or not⁷ | Request Date: ........
Request Source: ............
Request Form: ............
To all operators: Yes / No, only to our company |
| 3. Company/employee receiving the request | |

¹ Typically such requests correspond to the ‘major event’ types mentioned under 1. a) - g) in this document.
² Group Policy:
³ Group Instruction:
⁴ The Escalation Procedure is defined in Chapter 3.2.2 of the Instruction.
⁵ Note: Log also such requests and demands which were with-drawn, modified, changed, etc. following actions by the company
⁶ Choose between a) - h)
⁷ In case of g), fill in assessments to the extent they are relevant, note that the Policy principles 1 - 4 apply.
⁸ Requesting authority
⁹ Written or oral
⁰ Was the request sent only to your company, or to all operators
Five Assessments

7. Legal assessment - Is request formally valid, binding, possible to appeal
   Valid and binding: Yes / No
   Possible to appeal: Yes / No

8. Seriousness of impact on Freedom of Expression

9. Is request exact, any room for narrower interpretation
   If Yes, how: ……….
   If No, why: ……….

10. Business impact of a) rejection and b) execution
    a) Yes / No See footnote and give explanations
    b) Yes / No See footnote and give explanations

11. Risk to safety & liberty of company personnel
    High / Medium / Low

Transparency analysis

12. Possibility to share request with Telia Company
    No
    Yes – Attach copy of request

13. Possibility to disclose request to public or stakeholders
    Yes
    No – Indicate grounds for confidentiality, such as the relevant provision in the law

---

9 Which service(s), network(s), geographical area(s)
10 Add appeal’s influence on execution deadline
11 If impact is less than serious, indicate grounds
12 Indicate possibilities to limit; impact, scope, networks, services, time, time of day, any other.
13 Assess economic (revenue, assets), regulatory (licenses) and reputational impacts; indicate risk level (indicate at least high/medium/low) for each of these
14 Due to rejection/challenging execution; indicate risk level (indicate at least high/medium/low)
15 If not prohibited, attach a copy of request
16 If request is confidential/secret, indicate grounds
Anti-corruption aspects, if any

<table>
<thead>
<tr>
<th></th>
<th>Anti-bribery and Corruption risks – describe potential red flags.(^{17})</th>
</tr>
</thead>
</table>

Local recommendations

<table>
<thead>
<tr>
<th></th>
<th>Decision recommendations based on the above 5 Assessments(^{18}) and Transparency analysis(^{19})</th>
</tr>
</thead>
</table>

---

\(^{17}\) The local company is to do a due diligence of the vendor of such as requests/demands of equipment for direct access, e.g. software and/or hardware for SORM or similar systems. This includes certifying that any payment has been assessed when it comes to reasonableness of amount and adequacy of supporting documentation. Please contact Telia Company Ethics and Compliance for assistance.

Sourcing of equipment/services necessary for systems for direct access, e.g. SORM or equivalent systems, are to be carried out according to procurement procedures. This includes due diligence, adequate internal controls and correct books and records. Please contact Group Procurement Supplier Excellence for assistance with due diligence.

\(^{18}\) To reject/challenge, appeal, execute partially, execute fully, other

\(^{19}\) To share with Telia Company and/or other stakeholders
For Your information

The assessment form, as soon as it has been filled in, may be used for decisions / recommendations by the Telia Company Head of Region as follows:

Decision / Recommendation by Head of Region:

( ) In accordance with Telia Company internal Instruction the Country CEO of [...local company...] has provided the attached recommendations based on the five assessments; 1. Legal 2. Freedom of expression 3. As limited impact as possible 4. Business risks 5. Personnel risks.

( ) Management has been informed. Comments: …………………

( ) No serious impacts on freedom of expression have been foreseen

( ) (Possible) Serious impacts on freedom of expression at hand

( ) It is my conclusion that we can // cannot take measures to minimize and mitigate impacts on freedom of expression as defined in the Telia Company Policy and Instruction.

( ) Reputational risk for Telia Company if complying with request/demand without any point-of-challenge: Low // Medium // High

( ) The following measures are to be taken to respect and support freedom of expression: …………………

( ) External communication is not possible

( ) External communication is possible. [ I delegate to the Telia Company Head of Communications to consult with the local CEO to coordinate communication measures, if any, to be taken at local and Group levels. ]

Notes: ………………………

Date and Place

NN
Head of Region Sweden / Europe / Eurasia

---

20 Extract from Group Instruction, page 7, first step of Escalation:
“The local CEO/Head of Region must inform the following persons as soon as practically possible. The information must include the five assessments under section 3.2.1, together with proposals for action with regard to compliance or non-compliance with the request or demand, as well as any other actions to be taken. □ Chair of the Board of Directors of the local company □ Vice Chair of the Board of Directors of the local company □ Head of Region □ Region General Counsel □ Region Head of Communications □ Group General Counsel □ Head of Group Communications”