For Telia Company Colleagues, please note that internal actual assessments are to be made on the internal document, marked Confidential.

**Note, July 2017:**

**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 last updated in March 2017.


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 protect and support the freedom of expression of customers and users.

Within Telia Company, unconventional requests must be assessed and escalated in a way so that locally and group-wide Telia Company can seek ways to respect freedom of expression. The Form has been elaborated and updated during 2017, based on learnings from actual events and Telia Company’s new organizational structure.

On-going practical work based on the Policy, internal Instructions, processes as well as guidance (such as what has been built into this Form) includes efforts regarding continuous training and awareness building.
Introduction

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

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 promote the freedom of expression and privacy.

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

Information on request or demand

<table>
<thead>
<tr>
<th></th>
<th>Type of request</th>
<th>Request Date, Source, Form, If to all operators, or not</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>a) targeted surveillance in exceptional cases</td>
<td>Request Date: ........... Request Source: ............. Request Form: ............. To all operators: Yes / No, only to our company</td>
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<tr>
<td></td>
<td>b) mass surveillance, where the authorities demand unrestricted real-time network access, e.g. SORM and similar (See ‘Note A’ below)</td>
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<td></td>
<td>c) shutdown of all or parts of a network</td>
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<td></td>
<td>d) blocking or restricting access to specific services, internet websites or content</td>
<td></td>
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<td></td>
<td>e) blocking or restricting individual customers’ access to services or networks</td>
<td></td>
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<td></td>
<td>f) obligations to transmit mandatory communications issued by the government authorities (See ‘Note B’ below)</td>
<td></td>
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<tr>
<td></td>
<td>g) significant changes or proposed changes in the law, or significant imposed or proposed operational changes, in the context of freedom of expression in telecommunications (See ‘Note C’ below)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>h) other</td>
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</tbody>
</table>

Note:

Typically, such unconventional requests correspond to the ‘major event’ types mentioned under 1. a) - g) in this document.

The Escalation Procedure is defined in Chapter 2.2 of the Instruction.

Note: Log also such requests and demands that were with-drawn, modified, changed, etc. following actions by the company.

In case of g), fill in assessments to the extent they are relevant, note that the Policy principles 1 - 4 apply.

Requesting authority

Written on paper, Written electronically, or Oral

Was the request sent only to your company, or to all operators...
<p>| | | |</p>
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| **4.** | **Scope**<sup>9</sup> & duration of request | Scope: ……….  
Duration: ………. |
| **5.** | **Deadline for:**  
a) reply and  
b) execution | a) DD/MM/YY and time of day  
b) DD/MM/YY and time of day |
| **6.** | **Notes**<sup>10</sup> |   |

### Five Assessments

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| **7.** | **Legal assessment - is request formally valid, binding, possible to appeal**<sup>11</sup> | Valid and binding: Yes / No  
Possible to appeal: Yes / No |
| **8.** | **Seriousness of impact on Freedom of Expression**<sup>12</sup> |   |
| **9.** | **Is request exact, any room for narrower interpretation**<sup>13</sup> | Room for narrower interpretation: Yes / No  
If Yes, how: ……….  
If No, why: ………. |
| **10.** | **Business impact**<sup>14</sup> 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**<sup>15</sup> | High / Medium / Low |

### Transparency analysis

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</table>
| **12.** | **Possibility to share request with Telia Company**<sup>16</sup> | No  
Yes – Attach copy of request |
| **13.** | **Possibility to disclose request to public or stakeholders**<sup>17</sup> | Yes  
No – Indicate grounds for confidentiality, such as the relevant provision in the law |

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<sup>9</sup> Which service(s), network(s), geographical area(s)  
<sup>10</sup> Such as media coverage or relevant up-coming developments/meetings/etc  
<sup>11</sup> Add appeal’s influence on execution deadline  
<sup>12</sup> If impact is less than serious, indicate grounds  
<sup>13</sup> Indicate possibilities to limit; impact, scope, networks, services, time, time of day, and/or any other.  
<sup>14</sup> Assess economic (revenue, assets), regulatory (licenses) and reputational impacts; indicate risk level (indicate at least high/medium/low) for each of these  
<sup>15</sup> Due to rejection/challenging execution; indicate risk level (indicate at least high/medium/low)  
<sup>16</sup> If not prohibited, attach a copy of request  
<sup>17</sup> If request is confidential/secret, indicate grounds, e.g. paragraph in the law
### Anti-corruption aspects, if any

<table>
<thead>
<tr>
<th></th>
<th>Anti-bribery and Corruption risks – describe potential red flags.(^{18})</th>
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</table>

### Local recommendations

<table>
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<tr>
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<th>Decision recommendations based on the above 5 Assessments(^{19}) and Transparency analysis(^{20})</th>
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</thead>
</table>

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\(^{18}\) 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.

\(^{19}\) Sourcing of equipment/services (e.g. hardware/software) 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 Sourcing Sustainability for assistance with Due Diligence.

\(^{20}\) To reject/challenge, appeal, execute partially, execute fully, other

To share with external stakeholders
For Your information

This Form for Assessments and Escalation, as soon as it has been filled in, may be used for decisions / recommendations by the relevant level above the local company as follows:

Decision / Recommendation by the relevant level above the local company:

( ) 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 negative impacts on freedom of expression and privacy 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 and privacy: ………………..

( ) 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
(Relevant level above the local company)

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21 Extract from Group Instruction, page 5, first step of Escalation:
* The local CEO / Head of function must inform the following persons as soon as practically possible. The information must include the five assessments under section 2.1 above, together with proposals for action with regard to compliance or non-compliance with the request or demand, as well as any other actions necessary.
  - Chair of the Board of Directors of the local company
  - Vice Chair of the Board of Directors of the local company
  - Head of Region / Corporate Holdings / Level above the local company as relevant
  - Region General Counsel / Level above the local company as relevant
  - Region Head of Communications / Level above the local company as relevant
  - Group General Counsel
  - Group Head of Communications “