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For Telia Company Colleagues: Please note that internal actual assessments and escalation is to be made on the internal version of the document, marked Confidential.

Note, March 2020:

**FORM FOR ASSESSMENTS AND ESCALATION
- FREEDOM OF EXPRESSION & SURVEILLANCE PRIVACY
'UNCONVENTIONAL REQUESTS' (MAJOR EVENTS)**

Telia Company's 'Group Policy Freedom of Expression and Surveillance Privacy' was adopted in 2013 and last updated in January 2020, available [here](#). The Policy provides a framework for assessments and escalation of 'unconventional requests' so that locally and group-wide Telia Company can seek ways to respect and promote freedom of expression and surveillance privacy.

In our aim to build trust and contribute to best practice of shared learning, Telia Company here shares its internal tool (the below Form) developed for assessments and escalation of government requests and demands which potentially could have serious impacts on the freedom of expression and/or surveillance privacy rights of individuals, 'unconventional requests'.

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Introduction

The local company / equivalent must assess and escalate all government requests and demands that could potentially have serious impacts on freedom of expression and/or surveillance privacy, 'unconventional requests'¹. Assessment and escalation processes are defined in the 'Group Instruction - Freedom of Expression & Surveillance Privacy'². As soon as information in this Form has been escalated, it may be used for decisions/recommendations by the local company / equivalent together with the respective level above the local company as relevant.³

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

1. Assess whether a request or demand could have potentially serious impacts on freedom of expression and/or surveillance privacy, adding relevant other assessments defined in this Form, and, where applicable;
2. 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 & surveillance privacy of individuals, e.g. customers and users.

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

Information on the request or demand

1.	Mark type of request	a) Targeted surveillance in exceptional cases b) Mass surveillance, where the authorities demand unrestricted real-time network access, (See 'Note A' below, page 4) 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 or f) Obligations to transmit mandatory communications issued by the government authorities (See 'Note B' below, page 4) g) Significant changes or proposed changes in the law, or significant imposed or proposed operational changes, in the context of freedom of expression & surveillance privacy ⁴ (See 'Note C' below, page 4) or h) Other potentially unconventional request
2.	Request Date, Source⁵, Form, if to all operators or not	Request Date: Request Source: Request Form (Oral or in Writing): To all operators: Yes / No, only to our company

¹ Typically, such unconventional requests correspond to the 'major event' types mentioned under 1. a) - g).

² Group Policy:

<https://www.teliacompany.com/globalassets/telia-company/documents/about-telia-company/public-policy/2020/group-policy---freedom-of-expression-and-surveillance-privacy.pdf>

Group Instruction: Policy Tech;

<https://teliacompanyspace.sharepoint.com/sites/corp/SitePages/Policies-and.aspx>

The Escalation Procedure is defined in Chapter 2.2.2 of the above Instruction.

³ Note: Log also such requests and demands that were with-drawn, modified, changed, etc. following actions by the company.

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

⁵ Requesting authority/equivalent

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3.	Company/Unit and Employee receiving the request	Company/Unit: Employee, Name & Title:
4.	Scope⁶ & duration of request	Scope: Duration (Hours & Days):
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.	Notes⁷

Five Assessments by the local company / equivalent

7.	Legal assessment - Is request formally valid, binding, possible to appeal⁸	Valid and binding: Yes / No. If No, add link to applicable provision in the law Possible to appeal: Yes / No
8.	Seriousness of impact on Freedom of Expression or Surveillance Privacy⁹
9.	Is request exact, any room for narrower interpretation¹⁰	Room for narrow interpretation: Yes / No If Yes, how: If No, why:
10.	Business impact¹¹ 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 personnel¹²	High / Medium / Low

Transparency analysis

12.	Possibility to share request with Telia Company Group¹³	No Yes – <u>Attach</u> copy of request
13.	Possibility to disclose request to general public and/or stakeholders	Yes No – Indicate grounds for confidentiality, such as link to the relevant provision in the law

⁶ Which service(s), network(s), geographical area(s)

⁷ Such as internal documents, media coverage or relevant up-coming developments/meetings/etc

⁸ Add appeal's influence on execution deadline

⁹ Indicate risk level (indicate at least *high/medium/low*)

¹⁰ Indicate possibilities – within what is legally permissible - to limit; impact, scope, networks, services, time, time of day, and/or any other.

¹¹ Assess economic (revenue, assets), regulatory (licenses) and reputational impacts; indicate risk level (indicate at least *high/medium/low*) for each of these

¹² Due to rejection/challenging execution; indicate risk level, if any

¹³ If not prohibited, attach a copy of request. If prohibited, link to the applicable provision in the law rendering the request-document to be confidential

Anti-corruption aspects, if any

14.	Anti-bribery and Corruption risks – describe potential red flags.¹⁴	
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Local recommendations

15.	Decision recommendations based on the above 5 Assessments¹⁵, transparency¹⁶ and anti-bribery and corruption risks analysis	
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¹⁴ The local company is to do a Due Diligence of the vendor as to requests/demands of equipment for direct access, e.g. software and/or hardware. 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 (e.g. hardware/software) necessary for systems for direct access 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.

¹⁵ To reject/challenge, appeal, execute partially, execute fully, other

¹⁶ To share with general public and/or external stakeholders

Please note:**A. Specifically regarding requests about mass surveillance, e.g. direct access**

Before sending a purchase requisition to Telia Company Sourcing on such network deployment or upgrading which would provide a government and/or local authorities with new, broader and/or stronger possibilities for real-time network access, such network deployment or upgrading must be escalated to the Telia Company CEO. The Group CEO's decision shall be forwarded to Telia Company Sourcing together with the purchase requisition.

B. Specifically regarding obligations to transmit mandatory mass communications

An escalation procedure must also be initiated if the issue at hand relates to obligations to transmit mandatory communications (See Instruction, Chapter 2.2.2. 'Escalation Procedure', Requirement 4: "Assess if the purpose of the requested mass-communication is other than emergency, health or security related, e.g. if the communication is politically motivated.") To the Head of Group Communications.

C. Specifically regarding new legislation or operational changes

An escalation procedure must also be initiated if the issue at hand relates to proposals for new laws or any significant imposed operational changes with potentially serious impacts on freedom of expression & surveillance privacy (See Instruction, Chapter 2.2.2. Escalation Procedure.) To the Group General Counsel.

Short 'Check-list' when having received a potentially unconventional request:**1. Immediate actions**

- 1.a. Clearly record name of authority and, if permissible, the individual public official initiating the request;
- 1.b. Ask under which law(s) and paragraphs the request is being made;
- 1.c. Request a clear deadline for execution of the request and, if relevant and possible, for how long the request is valid;
- 1.d. Inform that the request by principle is also needed in writing (with signature(s) from the authorized official(s)); and
- 1.e. State that you will need to escalate within Telia Company before reverting to the authority on next steps.

2. Internal escalation and other measures

- 2.a. Immediately report incident to your local CEO / Head of function.
- 2.b. Contact, if local law does not hinder, competitors to check if an identical request was put upon them as well. Also discuss (if possible and legally permissible) with them about their action plan, and/or initiate a joint action plan;
- 2.c. Await, to the extent possible, guidance/instruction from senior management before re-engaging with the authority; and
- 2.d. Monitor developments and report to management.