

DON'T DO THIS AT WORK



WE TAKE RESPONSIBLE BUSINESS SERIOUSLY



WHY DO WE HAVE A CODE OF RESPONSIBLE BUSINESS CONDUCT?

Our Code of Responsible Business Conduct gives you high level guidance on our framework of policies and instructions and helps us create a Telia way of doing business by: defining a common “ethical compass” across the company; setting clear standards and expectations on how to act; and by helping us all recognize that doing business with integrity is a shared responsibility.

We take responsible business seriously. So seriously, we decided to make our global code of responsible business conduct into a series of playful stories about what you shouldn't do at work.

Our commitment to responsible business conduct
Being a responsible business means supporting international standards on human rights, labor conditions, the environment and anti-corruption. As such we observe a number of international declarations, conventions and guidelines. These include The United Nations’ Universal Declaration of Human Rights, The Core Conventions of the International Labor Organization, the OECD Guidelines for Multinational Enterprises and The United Nations Global Compact.

These international standards form the foundation for the Code of Responsible Business Conduct and our framework of policies and instructions.

Who does it affect?
The Code of Responsible Business Conduct applies to all of us; employees, directors and members of the boards. All contractors and consultants working as part of our operations must also follow the Code of Responsible Business Conduct. Violations of our Code of Responsible Business Conduct, including our policies and instructions will not be accepted, and there will consequences, even including termination of employment.

SET EXPECTATIONS

What's expected of me as an employee?
You're expected to read, understand and follow our Code of Responsible Business Conduct, Policies, Instructions and Guidelines, as well as all relevant local laws.

Always be transparent in any decisions and actions you take and never use your position, or company assets or deals, for private gain.

Speak up and report any concerns, or violations of our policies. If you're unsure how to act, just ask your manager or Ethics and Compliance Officer. If you feel at all threatened with personal danger or harm, or are forced to violate our principles, report it to your manager and the

Group Ethics and Compliance team as soon as possible.

What's expected of me as a leader?
In addition to the points above, you're expected to promote a culture of openness and integrity, to maintain an environment where your team feels comfortable about raising concerns.

BRINGING THE WORLD CLOSER ON THE CUSTOMER'S TERMS

Take the time to discuss and reflect on the areas of our Code that are specifically relevant to your team, listening carefully and trying to answer any questions or concerns. Seek help from the available resources if you need to.

Always act immediately if you're aware of potential breaches of the Code.

OUR PURPOSE

To grow our business and stay inspired in our work we must be truly relevant to our customers. Our ambition is to take Telia to the next level – to become a New Generation Telco.

Our purpose shows how we will get there: Bringing the world closer on the customer's terms.

OUR VALUES

Our shared values – Dare, Care and Simplify – guide how we act and behave on a day-to-day basis.

The values require us to dare to speak up by expressing our opinions and concerns. They require us to care about each other by being supportive, respectful and honest. And they require us to care about our world by acting responsibly, in line with our ethical standards.

WE'RE THE NEW GENERATION TELCO

That doesn't mean we're a new company – it's precisely our history, heritage, experience and knowledge that are the foundation for all the exciting things we're about to do.

Having been through both good times and challenging times together, we know that how we do things is truly as important as what we do. It's a reflection of who we are. But we also know that, while each of us is responsible for acting in a way that builds on our shared values and purpose, it's not always easy to know what the right action is.

We've created this Code of Responsible Business Conduct to help us all act in a way that builds a company we can be proud of: a Telia Company that takes responsibility for doing things right, a Telia Company that's respectful of society and the environment. A Telia Company that contributes to a better world, while bringing that world closer to our customers on their terms.

Johan Dannelind
President and CEO

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GIFTS & HOSPITALITY

We make sure gifts and hospitality always support a clear business objective and are: openly disclosed and accurately recorded, of reasonable value, and appropriate to the nature of the business relationship.

Three key things

- 1 Never offer or accept gifts, travel, payment or hospitality in return for a favorable decision or business advantage
- 2 We always pay our own legitimate business accommodation and travel expenses
- 3 Gifts that you receive may need to be recorded

DON'T ACCEPT SHINY GIFTS

DEFINITIONS

A **gift** is defined as the offering or receiving of goods or services with a market value. A gift becomes a bribe when there is intent to influence business relationships and decisions.

Business entertainment and **hospitality**, meetings with current or potential customers and suppliers, and stakeholder relations are only appropriate when they follow our Code of Responsible Business Conduct, as well as applicable laws and regulations.

DO THE RIGHT THING

What does it mean for Telia Company?
We always pay all accommodation and travel expenses for employees attending events relevant to our business.

If a gift is received with a market value above USD 50, it must be recorded and placed in the company gift repository. Any gifts received by an employee engaged in a supplier selection process must be recorded, regardless of the value.

How do I do the right thing?
Hospitality and gifts can complicate business decision making, so think carefully before offering or taking them.

Use your judgment to evaluate the situation, even when gifts don't exceed our limits. Note that lower limits can sometimes apply, depending on local guidelines, and any gifts you receive may need to be recorded with the company gift repository.

Don't offer or accept gifts, travel, payment or hospitality in return for a favorable decision or business advantage. And don't give any gifts, aside from low value company branded items such as pens, to public officials.

You can help vendors and third parties to help you do the right thing by actively communicating our policy to them.

IN PRACTICE

I've received an approval request for VIP tickets to a jazz festival from an insurance company, who is also the sponsor of the event. The invitation includes tickets and accommodation. Is it OK to accept?
If there is a clear business reason (e.g. we are the client of this company, meeting with important stakeholders) and the event is transparent (with an official invitation and many participants) and of reasonable value then it is OK to go. However, we need to pay for the travel and accommodation ourselves.

The New Year is approaching and I want to give a gift to our stakeholders. The corporate sales team has suggested giving a basket of sweets and a branded headset to a group of corporate customers, including some from the public sector. Is this OK?
To ensure we operate within company policy and local law, don't give the basket to the public sector customers. You could instead give them a branded notebook and pen, worth less than USD 10. It's also important to ensure any private sector recipients are objectively (not subjectively) selected.

Find out more

For more information, see our Anti-Bribery and Corruption Group Policy.

If you're unsure what to do, speak with Group Ethics and Compliance or your local Ethics and Compliance Officer.





C.E.O.



C.F.O.



C.T.O.



C.O.O.

Three key things

- 1 Avoid situations that may compromise – or may appear to compromise – your decision making
- 2 Inform your manager of any potential conflicts of interest involving yourself or others
- 3 Don't give preferential treatment to personal contacts such as friends or family

DON'T
FAVOR
FAMILY

CONFLICT OF INTEREST

To give our customers the best possible service, we make sure all our decisions can be taken independently of private interests or divided loyalties. We do this by actively avoiding or mitigating situations that create potential or perceived conflict of interest with our business activities.

DEFINITIONS

A **conflict of interest** exists when financial or other personal incentives influence – or may appear to influence – an employee’s professional performance.

DO THE RIGHT THING

What does it mean for Telia Company?
Employees must not make personal gain from business transactions or non-public information obtained through our work. In addition, procurement decision processes must be fair and transparent.

How do I do the right thing?
Always keep relationships with suppliers and business partners professional, avoiding over-familiarity. Don’t give preferential treatment to personal contacts such as family or friends and avoid situations that might create suspicion of it.

Also avoid participating in any decision-making that creates, or can be perceived to create, a conflict of interest. If you become aware of a potential conflict of interest, tell your manager as soon as possible.

If you are thinking of becoming a board member, employee or consultant of an external business, high profile non-profit or similar organization, make sure you obtain written approval first. You can take part in activities outside your normal job but tell your manager if it creates a potential, or perceived, conflict of interest.

You can make sure you’re doing the right thing by asking yourself whether you have any conflict of interest to disclose. Could your personal relationships influence business decisions? Does your role include any decision-making authority over family members or close friends?

If these questions raise any potential issues, discuss the situation with your manager or your local Ethics and Compliance Officer.

IN PRACTICE

My husband is part-owner of a company that is being considered as a supplier to Telia. Is this appropriate?
It is OK for family members or other close relations to be suppliers. However, you need to remove yourself from this conflict of interest situation by declaring the relationship and not participating in the procurement or execution processes.

My neighbor is a supplier to Telia and has invited me to stay at their summerhouse for the weekend. Can I go?
It is OK to go provided we aren’t in the middle of negotiations with the supplier and provided you don’t have a role that could create an impression of preferential treatment.

My cousin recently graduated and is looking for a job. We have relevant positions open and she’s asked me to help her secure one. What should I do?
Direct your cousin to our website where she can apply online. You can also advise her to call the contact given on the website, to follow up on her application.

Find out more

For more information, see our Anti-Bribery and Corruption Group Policy.

You can raise concerns or report potential conflicts of interest through our secure web portal, Speak-Up Line. If you are unsure what to do, speak with Group Ethics and Compliance or your local Ethics and Compliance Officer.

DON'T SPONSOR THE WRONG THING

SPONSORSHIPS & DONATIONS

Sponsorships and donations are a great way of developing our business and supporting the societies in which we operate. We're careful to always plan and operate these ethically, in a way that supports our business objectives and creates social value.

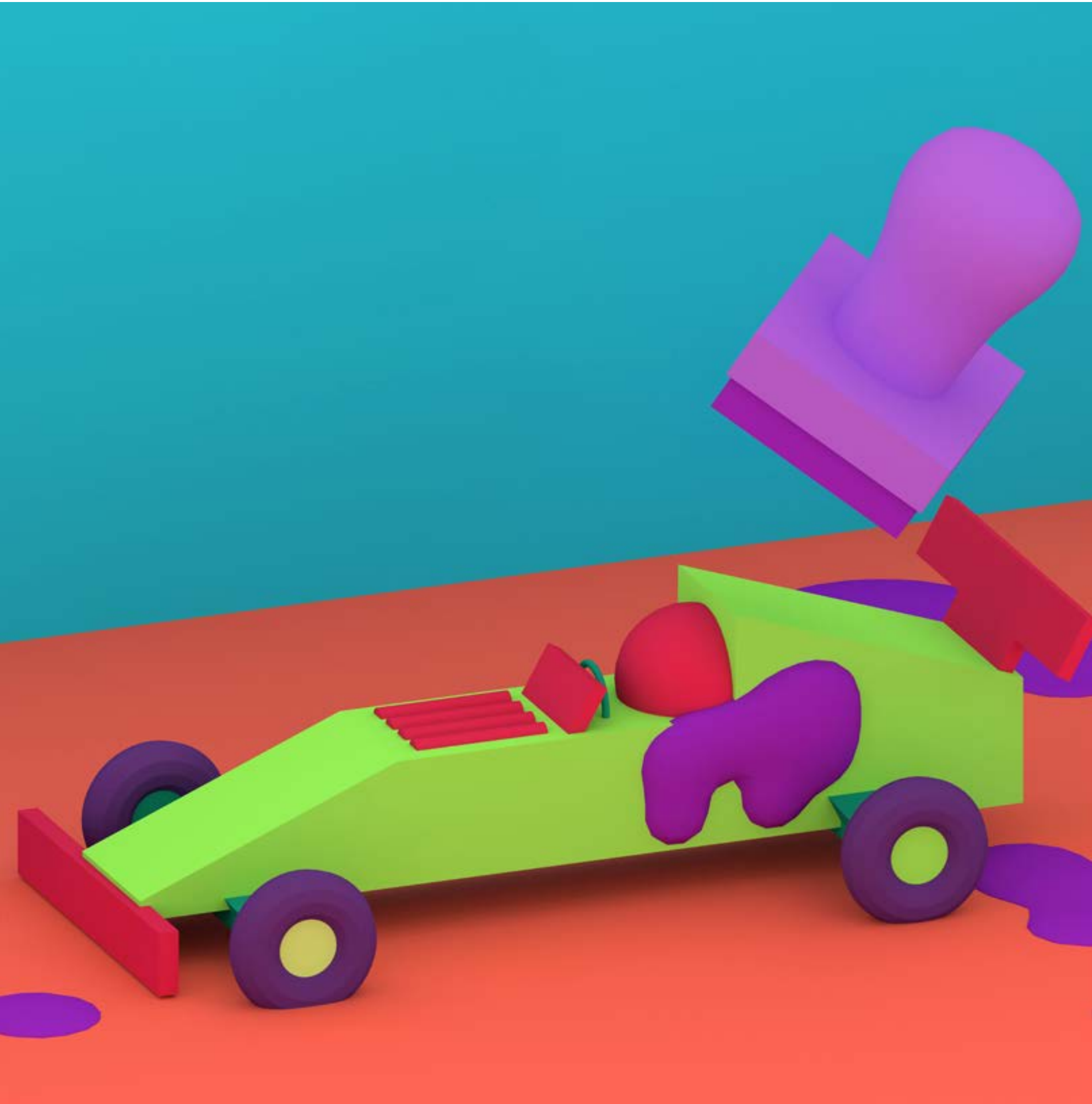
Three key things

- 1 Never promise a sponsorship or donation without following the approval process
- 2 Always evaluate the sponsorship from a reputation and corruption risk perspective
- 3 Base sponsorship decisions on a long term strategy and plan

Find out more

For more information, see our Anti-Bribery and Corruption Group Policy.

You can raise concerns or report potential misconduct through our secure web portal, Speak-Up Line.



DO THE RIGHT THING

What does this mean for Telia Company?
It's important to make sure any support we offer is consistent with our business and sustainability strategy. Always assess options against a reputation and corruption risk profile, documenting choices and following up on any actions needed.

Make sure any support is unconnected to our business deals and cannot be interpreted as political support, political payment or bribery. Never support individuals, organizations, activities or events that we believe to be unethical or discriminating. Likewise, never support religious or military activities, or activities that have a significant negative impact on the environment.

Ask yourself whether we'd be able to communicate the support publicly – if the answer's no, then it isn't right for us.

How do I do the right thing?
Plan any sponsorship and donations activities carefully as part of an annual program, by thinking long term and following our business and sustainability strategy.

You should also document every step of the sponsorship, tracking the recipient's use of funds against pre-defined targets and metrics.

Follow the due care process when assessing the recipients of support and consider the risks of corruption – never use sponsorships and donations as a way to influence business processes with an individual customer.

IN PRACTICE

I'm in a contract negotiation. The potential customer says we will get the contract if we sponsor their event.
You should politely decline the offer. We never use sponsorship and donations to influence the process of gaining or retaining business with an individual customer.

I'm asked by someone I know to sponsor an event that could be relevant to our business.
Never promise a sponsorship or donation without following the relevant process. You can refer to our policy and let them know we only sponsor activities within certain areas, to make sure they have a positive impact on our business or society, or both.

My manager asks me to provide financial support to their child's football team.
Always ask your colleagues responsible for marketing, sponsorships and donations to assess each request. Be sure to follow the proper decision process before making any payment.

What if an important politician asks for financial support for his party?
We never give political contributions or support that can be interpreted as a political payment or bribery – refer the requester to our policy.

DEFINITIONS

Corruption is the abuse of entrusted power for private gain.

Bribery is the offering, providing, authorizing, requesting or receiving of a financial or other advantage intended to influence a transaction or decision, or encourage misuse of a person's position.

Financing of corruption is a payment made to a third party – such as an agent, partner, vendor or consultant – who uses it (or part of it) for a corrupt activity.

Facilitation payments are payments offered or made to a public official to secure or speed up a routine and necessary government or official action.

DO THE RIGHT THING

What does it mean for Telia Company?
We always keep accurate and transparent financial records, as this helps ensure all our payments are made for the right reasons.

We never offer, accept, provide, authorize, request or receive anything of value that could be intended to influence or reward a business decision. This includes bribes, either direct or indirect, including any routed through a third party. It also includes facilitation payments or financial support that could encourage or lead to corruption.

How do I do the right thing?
Never make personal gain or profit from a business transaction. This includes offering, providing, authorizing, requesting, accepting or receiving a bribe.

Always take due care when engaging with third parties, such as partners, suppliers, consultants, subcontractors, lobbyists, agents and agencies. If you're aware of potential corruption or bribery, report it to your manager or local Ethics and Compliance Officer as soon as possible.

If you're asked to make a facilitation payment, stand your ground and contact the responsible manager to help resolve the situation.

Make sure your documents are in order when approaching public officials in a region where facilitation payments are customary – this gives less opportunity to ask for additional payments.

Be aware that refusing to make facilitation payments can make it more difficult to get the service you need – plan ahead for this and speak to your manager if you have any concerns.

We recognize that, in rare and exceptional situations, an employee may be forced to break these rules under threat of violence or personal harm.

IN PRACTICE

I'm responsible for our network roll-out in a market with high regulatory complexity. The roll-out has already been delayed and I'm getting impatient – it's damaging the company and we're now in danger of missing our targets. I've now been offered the option to make a donation to an orphanage, which could speed up the process.
Explain to the official that you're not responsible for donations. You can also point out that the company keeps donations separate from business activities.

Find out more

For more information, see our Anti-Bribery and Corruption Group Policy.

You can raise concerns or report potential misconduct through our secure web portal, Speak-Up Line. If you're unsure what to do, speak with Group Ethics and Compliance or your local Ethics and Compliance Officer.

IMPROPER PAYMENTS

We act with the highest standards of transparency and integrity wherever we operate. By doing so we can ensure our actions and decisions are always in the best interests of customers, our business and society.

DON'T DO BRIBES

Three key things

- 1 Nobody should gain personally from our business decisions
- 2 Take due care when engaging with third parties and never make facilitation payments
- 3 Always keep accurate and transparent financial records





DON'T MEET PUBLIC OFFICIALS ALONE

PUBLIC OFFICIALS

Since they often control decisions or processes that can affect our business success, we hold ourselves to the highest ethical standards when working with public officials and politically exposed persons.

Three key things

- 1 Never offer gifts or business entertainment to public officials, or officials involved in public procurement
- 2 Ensure discussions and agreements involving public officials are fully documented
- 3 Bring a colleague when meeting public officials

DEFINITIONS

A politically exposed person or public official is:

- An officer, member or employee of a governmental institution or department
- An officer, member or employee of an agency of a governmental institution
- Anyone acting in an official capacity for or on behalf of a governmental institution, department, agency or international governmental organization
- A political party official
- A candidate to a political or governmental office, or appointee to such an office
- A government officer or employee at the international, national, state/regional or local level
- An employee of a state or government-owned business, school, hospital, or other entity

DO THE RIGHT THING

What does it mean for Telia Company?

We aim to protect employees and the company from potential conflicts of interest and corrupt payments.

There are a number of ways this affects our dealings with public officials or officials involved in public procurement. In particular, we provide only customary tea, coffee or simple lunches during business-related discussions or events. We never offer gifts or business entertainment, nor special numbers or free minutes unless it's part of a legitimate business deal.

How do I do the right thing?

It's best to always bring a colleague when meeting public officials or politically exposed persons. This makes difficult situations less likely to arise and, if they do, you have someone to support you and confirm your version of events.

In addition, you should always agree meeting agendas in advance, making sure that minutes are taken – share these with the appropriate people afterwards.

Never give gifts to public officials, except for branded company items of minimal value (if permitted by local law or the recipient's code of conduct).

Find out more

For more information, see our Anti-Bribery and Corruption Group Policy.

If you're unsure what to do, speak with Group Ethics and Compliance or your local Ethics and Compliance Officer.

COMPANY INFORMATION ASSETS

Information is one of our most valuable and sensitive assets. We protect it carefully and follow relevant legal, contractual and business requirements.

DON'T SHARE SENSITIVE INFORMATION

Three key things

- 1

We aim to ensure the confidentiality, integrity and availability of our information
- 2

Treat all non-public information with care
- 3

Avoid risky internet use

DEFINITIONS

Non-public information means internal, confidential or secret information that isn't intended to be public.

DO THE RIGHT THING

What does it mean for Telia Company?
There are three dimensions to how we protect our information: confidentiality, integrity and availability.

Confidentiality means we protect information from exposure to unauthorized people. Integrity means we ensure information is accurate and complete. While availability means we ensure information is accessible and usable when needed.

How do I do the right thing?
Use company information only for work tasks and never for personal use. For example, don't disclose information on social media unless you have permission to do so.

It's also important to protect company information against accidental or unauthorized disclosure, misuse, improper alteration or destruction – especially when handling information outside your workplace.

Keep your desk clear of papers and removable storage media – lock these away when you're not using them – and use only company-approved equipment, services and software. Always follow the acceptable use terms and conditions for IT equipment, as set by your local Country/Group function – this may take the form of a mobile device policy or remote access policy.

Stay safe on the internet by not clicking on suspicious links or opening suspicious email attachments. Avoid pirated material, content with unknown license terms and websites with inappropriate or malicious content.

If you suspect or are aware of a security incident, fraud or threat, report it immediately to your manager or Security Incident Report function through the Speak-Up Line portal.

Personal security
We want everyone to feel able to do their jobs without fear or threat.

When on our premises, always wear your ID badge visibly and allow access only to authorized people. Follow the terms and conditions for premises use as set by your local Company/Group function – these may include mandatory safety training and restrictions on activities.

IN PRACTICE

I sometimes need to make calls and answer emails outside my usual workplace. Is this a problem?
When handling company information, you're always responsible for protecting it in the right way. Always consider where you are, making sure the information is not disclosed to unauthorized people – take extra care when in public places.

If you're unsure how to handle information correctly, speak to your manager or the security team.

I'm working from home and want to use my personal computer because it has a larger screen. Is that OK?
It's a security risk to use your personal equipment for company work. Use only our approved equipment, services and software when managing company information.

Who's responsible for ensuring our information is protected?
We're all responsible for handling our information responsibly. If you've created a document, and are the owner of that information, you must ensure it gets the right level of protection. One way you can do this is to mark the document with the appropriate level of confidentiality.

I've created a memo following a meeting. Who's allowed to read it?
This depends on the confidentiality of the meeting and who needs the information to do their work. The information owner should decide who can read the memo – normally this would include attendees of the meeting and other members of the relevant teams.

Find out more

If you're unsure how to handle any information, you can look for guidelines or instructions on the Intranet, or speak with your manager or local security team.





DON'T COMPETE UNFAIRLY

Three key things

- 1 Carefully follow the relevant competition or antitrust laws wherever we operate
- 2 Never use our position as market leader to restrict competition
- 3 Legal assistance is always available to you for competition law issues

FAIR COMPETITION

Free and fair competition leads to the best outcomes for consumers, society and our business. We fully support competition and ethical conditions, within the local legal frameworks of wherever we operate.

DEFINITIONS

Competition law prohibits all agreements between companies, decisions by associations of companies and concerted practices which have as their object the prevention, restriction or distortion of competition. Even where agreements do not have this purpose, they are prohibited if their consequences are those mentioned above.

When holding a dominant market position in the relevant markets, we need to be especially aware of the effects that our decisions have on customers, competitors and service providers. A dominant market position is not prohibited, but abuse of it is.

Competition rules apply to any situation, formal or informal, e.g. social events, informal social gatherings as well as meetings and workshops

DO THE RIGHT THING

What does this mean for Telia Company?
As an international business our activities can be subject to competition legislation, at national or regional level.

Although specific legislation will vary, it will generally prevent competitors from seeking to share markets, fix prices or otherwise affect competition. It will also prevent companies in a dominant market position from abusing that position.

We don't engage in any practices or activities that breach relevant competition or antitrust laws.

In particular, we're careful to never take actions that hamper or harm customers, competitors or service providers, or that could be seen as contrary to competition law.

Nor do we make any agreements with the intention to prevent, restrict or distort competition. This includes: fixing prices or other trading conditions; limiting or controlling production, markets, technical development or investment; sharing markets or supply sources; discriminating against other companies or putting them at a competitive disadvantage; and requiring the acceptance of parties unrelated to the contract.

How do I do the right thing?
When you or any of our representatives contact an actual or potential competitor, follow the relevant competition law carefully.

Never discuss or agree prices (historic, current or projected), pricing policies/formulas, profit margins or similar sensitive issues. This includes fixing a minimum price or giving a reseller strong incentives – e.g. better contract terms – to maintain a minimum price.

Nor should you discuss or agree marketing, market areas, customers and suppliers.

In addition, never agree to refuse to deal with a supplier or customer, or discuss or seek the adoption of standards that restrict the development or use of technologies, or that exclude rivals, suppliers or customers.

IN PRACTICE

How do I know whether we are in a dominant position?
The definition of dominance depends on the geographic and product market – speak with your Legal Affairs Officer.

A competitor has approached me to discuss the future market situation – I think prices will be discussed, too. How should I respond?
Don't engage in this kind of discussion. If possible, document your rejection of the request. If you feel you need help, speak with your Legal Affairs Officer.

Find out more

If an issue around competition law arises, or you're unsure how the law applies to a situation, speak with your Legal Affairs Officer as soon as possible, while agreements, pricing decisions or other measures are still at an early stage of planning.

We always provide legal assistance for competition law issues.

DON'T DO INSIDER TRADING

Three key things

- 1 Protect confidential business information
- 2 Don't trade shares while in possession of insider information
- 3 Don't mislead others with inaccurate information

INSIDER TRADING

Ethical behavior helps to support an efficient capital market. We always pursue the highest ethical standards with respect to insider information.

DEFINITIONS

Insider information is information that, if made public, is likely to have a significant effect on the value of shares or other securities.

Insider trading is the use of insider information to trade shares or other securities, or the sharing of information with others who might use it to trade.

Don't buy or sell shares and other securities in any company while in possession of insider information.

These rules apply even after you stop working at Telia.

DO THE RIGHT THING

What does it mean for Telia Company?
We take great care to protect confidential business information, especially when its disclosure could influence the share price of Telia or another company.

How do I do the right thing?
Insider trading is illegal in most countries.

Never reveal confidential business information or insider information – even if accidentally obtained – to unauthorized people. Similarly, do not spread rumors or mislead others with inaccurate information.

IN PRACTICE

I've overheard someone say we are planning to acquire a strategic supplier. I expect the supplier's share price to increase once this news is announced. Can I purchase shares in the supplier?
You must not buy the shares, or tip someone else off about the plans. Trading based on insider information is illegal, whether the shares are of Telia or a supplier.

Find out more

For more information, see our Insider Trading Policy, including information about reporting duties and trading bans.

You can also raise questions or concerns about potential misconduct with your Legal Affairs contact.





CUSTOMER PRIVACY

Customers trust us with their private and sensitive information. Living up to this trust by respecting and safeguarding our customers’ privacy is vital to us. We take great care to maintain the confidentiality of this information and use it only in the ways needed to complete our work.

DON'T VIOLATE CUSTOMERS' PRIVACY

Three key things

- 1 Customers’ privacy is a core consideration in everything we do
- 2 Only process personal data to the extent needed to perform your working duties
- 3 Keep all personal data strictly confidential and handle it in a secure way

DEFINITIONS

Customer privacy is about how we collect, use and process customer personal data, and respect the rights of customers with regards to their data and privacy. The right to privacy is a human right.

Personal data includes all information about a person whose identity is clear or can be established by obtaining and combining additional information.

DO THE RIGHT THING

What does it mean for Telia Company?
Trust is at the heart of our business, so we make privacy a core consideration in everything we do. This means integrating privacy as a natural part of our services, processes and IT infrastructure as well as daily work, and taking a ‘privacy by design’ approach to new development work.

We aim to operate highly secure communication networks and prevent unauthorized access to our customers’ personal data. We also work to reduce the risks to our customers’ human rights posed by government surveillance of communications.

To manage the risks in an ever-changing world, we continuously and pro-actively assess how our actions and decisions impact customers’ privacy, living always by both the letter and spirit of international standards and laws on human rights, including the right to privacy. This includes respecting our customers’ right to privacy and using their personal data lawfully, fairly and in line with our own high standards as described in our Group Customer Privacy Policy.

We collect only relevant personal data that we need in order to provide our services and run our business. The data we do hold, we protect in terms of confidentiality and integrity and use only for the purpose we collected it for. When it’s no longer needed for the purpose it was obtained for we delete or anonymize it, unless mandatory legal data retention requirements apply.

We maintain transparency at all times by making information available to our customers and giving them meaningful choices around

how we use it. We also commit to and are accountable for complying with the law and our own high standards on privacy, and require the same from our suppliers.

How do I do the right thing?
Only process personal data to the extent needed to perform your work, handling it in a secure way with strict confidentiality. Follow all predefined routines and laws, as well as our internal requirements.

Take responsibility for your own privacy awareness and increase your knowledge. Consider privacy in everything you do, along the whole life-cycle of customer data – from collection to deletion. Never take an action affecting customers’ personal data or privacy before you’re sure it complies with our privacy requirements.

IN PRACTICE

Can I use customer personal data for any purpose?
No – never collect, view, use, share or disclose any customer’s personal data if you’re not absolutely sure that you’re allowed to do so. If in doubt, talk to your manager or the local Privacy Officer, who is there to answer your questions related to privacy, collection or use of personal data.

Your friend suspects that her ex-partner has a new relationship. She asks you to look at his billing information to see if there’s a phone number that he calls often and for a long time. What should you do?
Customer personal data may only be viewed and used to perform working duties in compliance with pre-defined working routines and applicable laws. You must not look at these details or share them with your friend.

Over lunch, your colleague tells you about a customer who is also a famous celebrity. He is having problems paying his phone bill due to a difficult financial situation. Of course, everyone is interested in his private life – should you ask for more detailed information?
No – you should tell your colleague not to discuss customers’ personal matters with anyone. Customer personal data is confidential information and may only be used to perform work duties.

Find out more

For more information, see our Group Policy on Customer Privacy, or speak with your local Privacy Officer or Group Privacy Officer.

You can also raise concerns or report potential misconduct through our secure web portal, Speak-Up Line.

FREEDOM OF EXPRESSION
Freedom of expression and privacy
are at the heart of our business.
We protect and support the rights
of all our customers to exchange
ideas and promote the development
of more open societies.

Three key things

- 1

We respect and promote the freedom of expression and privacy of users
- 2

Avoid and mitigate any potential negative impacts on risks to the freedom of expression and privacy of users
- 3

Support the rights of users in relation to new rules that may negatively impact individuals' freedom of expression and privacy

DON'T DISRESPECT
FREEDOM OF
EXPRESSION

DEFINITIONS

Freedom of expression is a fundamental human right derived from the inherent dignity of all persons.

DO THE RIGHT THING

What does this mean for Telia Company?
We respect and promote international standards on human rights, including our customers' right to freedom of expression and privacy.

This means we always raise concerns about new legislative, administrative, license or law enforcement rules we are required to follow if we think they may negatively impact users' freedom of expression or privacy.

It also means we protect, promote and support freedom of expression and privacy through responsible decision-making and are as transparent as possible regarding the extent of government surveillance and restrictions on communications.

We've implemented a point of challenge to ensure we carefully assess unconventional requests and demands from governments that may affect the freedom of expression of our customers. We comply only as far as necessary, no further.

We don't get involved in the politics of the countries in which we operate but our management does pursue public advocacy

based on the policy, arguing for clear and transparent legislation. We also build dialogue with governments and other stakeholders around regulations that affect our business and the rights of our customers.

How do I do the right thing?
To promote everyone's right to freedom of expression and privacy, aim to anticipate, avoid and mitigate risks to the freedom of expression of users. Always defend the universal right to seek, receive and share information and ideas through any media, regardless of frontiers.

If you become aware of unconventional requests and demands that might have serious impacts on freedom of expression and privacy, assess and escalate these so we can interpret the request as narrowly as possible and apply an appropriate point-of-challenge.

IN PRACTICE

Our CEO has published a strong public commitment to respect and support freedom of expression – our networks and services help to facilitate this.

We've also teamed up with competitors to use our work to promote freedom of expression, while the Law Enforcement Disclosure Reports we publish allow stakeholders to increase their knowledge and understanding, and encourage greater transparency.

Find out more

For more information, see our Freedom of Expression Policy.

We also have a tool that we use to assess and escalate any government requests or demands that have potential serious impacts on our customers' freedom of expression and privacy.





Three key things

- 1 Our communications should be proactive, transparent, straightforward, relevant and service-minded
- 2 Act with care and responsibility when posting online
- 3 Treat internal communications going to a wider group as if they are public

DON'T
POST
WITHOUT
THINKING

COMMUNICATIONS & MEDIA RELATIONS

We communicate openly, in ways that reflect our shared values. By doing this consistently we can build and maintain a strong public brand image that supports our business activities.

DO THE RIGHT THING

What does it mean for Telia Company?
All of our communications should be proactive, transparent, straightforward, relevant and service-minded.

We provide all information in accordance with local laws, and the rules and established practices governing companies listed on the stock exchange(s).

How do I do the right thing?
Act responsibly online, using your common sense – you’re personally responsible for the content you publish on blogs, tweets, wikis or other forms of social media. Never talk about revenues, future products, pricing decisions, unannounced financial results or other confidential matters.

Always review what you have written – if it makes you even slightly uncomfortable, maybe sleep on it before publishing?

Treat any internal communications that will go to a wider group of employees with the same care as public communications and keep yourself informed about issues relevant to your work.

IN PRACTICE

What is appropriate content for my work on social media?
Talk to your manager, a communications officer or Human Resources – they can help in deciding.

A journalist calls unexpectedly and wants to ask me some questions. What should I do?
Take their contact details and offer to call back soon. Then talk with a press officer and decide together how to respond.

What should I do if I notice irregularities that could be interesting to the media?
Contact your manager or press/communications officer immediately so the problem can be addressed. You can also report violations of our Code through the Speak-Up Line.

Find out more

For more information, speak with your Press Office or communications officer.

You can raise any concerns or report potential misconduct through our secure web portal, Speak-Up Line.

RESPONSIBLE PROCUREMENT

Procurement contributes to our competitiveness and profitability. Our procurement approach supports our business activities by implementing a set of standardized processes, tools, rules and governance. By purchasing responsibly we can build reliable, long-term business relations with suppliers and contractors, and use company resources in the most efficient way.

Three key things

- 1 Don't contact suppliers directly – Procurement will do this
- 2 Not following the procurement processes or using the tools available can result in financial, operational and reputational risks for us
- 3 Don't give or receive any gifts, bribes or other illegal payments, to or from suppliers and contractors

DON'T BUY IRRESPONSIBLY

DO THE RIGHT THING

What does it mean for Telia Company?
We want to be seen as fair and professional, so we work to the highest standard of business ethics and procurement practices. We expect our suppliers and contractors to meet the same high standards. Not following the processes or using the tools available can result in financial, operational and reputational risks for us.

In particular, we select suppliers according to fair, pre-defined criteria as part of a transparent and competitive bidding process, with supplier qualification, including sustainability requirements as specified in our Supplier Code of Conduct and other documents.

Our Procurement department is responsible for all purchases and supply contract negotiations including the signing of agreements with suppliers. All of our purchases require a written Purchase Order (PO) before the delivery of any goods or services – we don't pay any invoices without a PO.

How do I do the right thing?
Always use our purchasing systems to make a purchase requisition. Don't contact a supplier directly – if you need help, contact your local Procurement department who will assist.

Carry out approvals for Purchase Orders, contracts, goods/service receipt and invoices carefully and in a timely manner, flagging any mistakes or discrepancies.

Never give or receive any gifts, bribes or other illegal payments, to or from suppliers and contractors, and don't share confidential information such as purchase prices, procurement projects or contract conditions, either internally or externally.

If in doubt, or if you're aware of any actual or potential conflicts of interest, speak with your manager, the Legal Department or the Ethics and Compliance Office.

IN PRACTICE

Who selects new suppliers?
We keep a clear separation between the defining of our needs and the selection of suppliers.

You're responsible for contacting Procurement in good time when you have a purchasing need. Procurement is responsible for evaluating and selecting suppliers (in collaboration with you).

Our procurement approach helps us to buy the best quality at a competitive price, and ensure the goods or services meet our business and sustainability needs.

Who can sign supplier contracts?
Supplier agreements shall always be put in writing. They are then signed or co-signed by an authorized person in Procurement, after proper business approval by internal stakeholders. Agreements always need to be signed and entered into the procurement system before purchases can be made.

If I need to buy services or products, can I send a request for proposal to potential suppliers?
No, you shouldn't contact potential suppliers yourself. Instead, create a Purchase Requisition in our purchasing system. Procurement will then contact you for more information if needed or contact potential suppliers directly.

Where do I find information about the purchasing process and tools?
You can find information about the purchasing process and tools on our intranet. If you're unsure about anything, just speak with your local Procurement team.

Find out more

For more information, see our Procurement Policy, Supplier Code of Conduct and other procurement related guidelines.

You can also speak with your local Procurement team.





DON'T BE A BULLY

Three key things

- 1 We actively promote workforce diversity
- 2 Everyone is entitled to enjoy a workplace that is free from harassment or discrimination
- 3 Treat all co-employees with respect, dignity and common courtesy

FAIR EMPLOYMENT & DIVERSITY
Our strong culture and competitive edge depends on us being able to identify, hire and retain the best people. We are committed to implementing fair employment practices and actively fighting all forms of illegal discrimination.

DEFINITIONS

Workforce diversity describes an environment in which fair employment practices support a workforce that includes people from many different backgrounds.

Diversity initiatives aim to increase the value of workforce diversity. We design our management processes to develop and maintain a workplace in which all employees can contribute to their full potential.

DO THE RIGHT THING

What does it mean for Telia Company?
We want to provide a good working environment with fair terms of employment for all employees. If we all commit to actively living our company values and behaviors, it will make a real positive difference.

We observe international human and labor rights standards. This includes respecting and working in line with internationally-proclaimed human rights and never using child or forced labor.

We also offer and maintain a safe and sound working environment that meets or exceeds current global standards and legislation, with working conditions that comply with local statutory requirements and collective bargaining agreements – all employees have the right to form or join associations and to bargain collectively.

All employees should be able to enjoy equal opportunities based on competence, experience and performance, regardless of gender, race, ethnicity, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background and/or characteristics protected by applicable law. We have zero tolerance of discrimination, harassment and bullying.

How do I do the right thing?
Always treat other employees with respect, dignity and common courtesy, allowing everyone to enjoy a workplace that is free from harassment based on his or her gender, race, ethnicity, religion, age or any other trait.

Follow all applicable labor and employment laws as well as our People Policy. In particular, never bully, victimize or behave in a discriminatory way towards anyone. This includes physical or verbal intimidation or humiliation.

Be aware that humor is not the same for everyone, so avoid telling stories or jokes that could be seen as inappropriate. Similarly, don't distribute or display material that some may find offensive.

If you observe any inappropriate or unacceptable behavior in the workplace, report it to your manager or local HR department as soon as possible.

IN PRACTICE

My manager speaks to us in a humiliating and intimidating manner. Occasionally she scolds us in meetings. What should I do?
You are entitled to work in an environment free from intimidating, hostile or offensive behavior that is subject to legal protection. Report the problem to your manager's manager or HR – they will help you to resolve the situation.

My colleague made a comment that made me feel uncomfortable. Is that harassment?
Not every negative or critical comment is defined as intimidating, hostile or offensive. If you are uncomfortable, try speaking with your manager first. You can also contact Human Resources or the Speak-Up Line.

What do I do if I receive an email that includes offensive jokes or language?
Jokes that could be reasonably viewed as offensive have no place here and shouldn't be sent through company email, regardless of the intended recipients. You may tell the sender that you found the email offensive. You can also notify your manager, Human Resources or the Ethics and Compliance Office.

Find out more

For more information, see our People Policy. If you have any questions, speak with your line manager or local HR department.

You can raise any concerns or report potential misconduct through our secure web portal, Speak-Up Line.

DON'T ENDANGER YOURSELF OR OTHERS

OCCUPATIONAL HEALTH & SAFETY

Most accidents, incidents, injuries, work-related illnesses, and unsafe acts and conditions are preventable. We want to protect and improve the health and safety of everyone who works for or with us, everywhere we operate.

Three key things

- 1 A healthy and safe workplace is everybody's responsibility
- 2 It's about more than preventing accidents
- 3 Think about what issues exist in your team

DO THE RIGHT THING

What does it mean for Telia Company?

We offer and maintain healthy and safe working environments that meet or exceed global standards and national legislation.

In particular, we prioritize work processes, design of service and working methods that reduce any negative impacts on individuals.

Safety is the most important factor in any of our decisions, but a healthy and safe workplace is not only about preventing accidents – both physical and psycho-social well-being are important.

How do I do the right thing?

Take personal responsibility for your own health and safety by making sure you understand and follow our safety rules and routines.

You can also contribute to a safe working environment for others by halting and reporting unsafe situations, as long as doing so does not put yourself or anyone else in danger.

IN PRACTICE

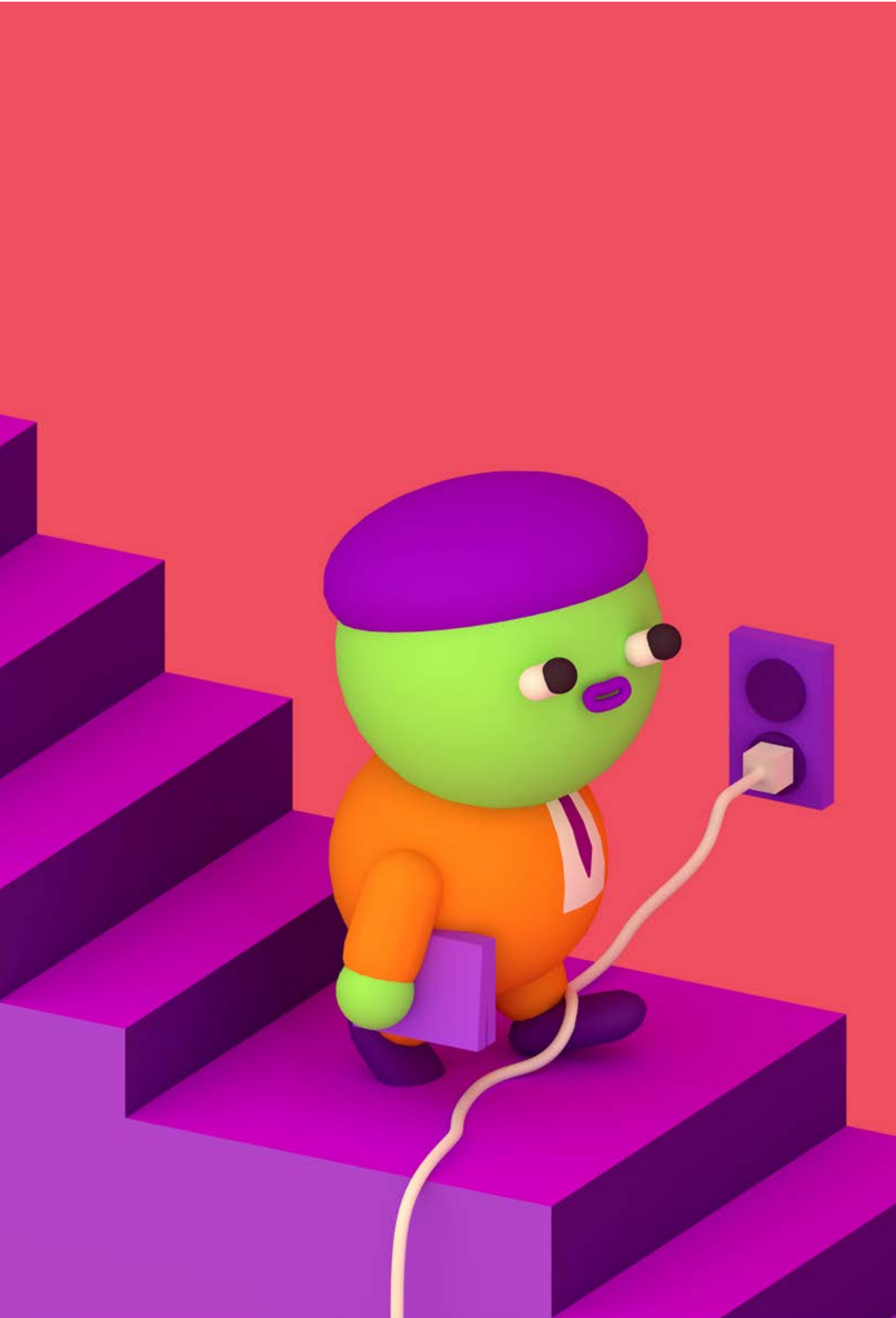
To keep health and safety top of mind, ask yourself and your team these questions:

- Do we have an everyday health and safety culture in our team? How well does it work? How can we make it better?
- How does a healthy work environment contribute to our business?
- What kind of health and safety risks do we have in our team?
- Do we have a plan to identify, prevent and correct risks?
- Do we know how to report a near miss, incident or work injury?
- How can we promote good health and well-being in our team?

Find out more

For more information, see our Occupational, Health and Safety Policy.

You can raise any concerns or report potential health and safety issues through our secure web portal, Speak-Up Line.



DON'T TRAVEL IF YOU DON'T NEED TO

TRAVELING

Health, safety, security and environmental responsibility are our key considerations when we're traveling. To ensure we get the most out of our travel, we also manage all cost and time commitments carefully.

Find out more

For more information, see our Travel and Expenses Instruction and Security Policy or visit the Intranet.



DO THE RIGHT THING

What does it mean for Telia Company?
We ensure that business travel and meetings are always productive and safe for you as an employee, and organized with cost-effective providers.

You can find safety information relating to business trips on our intranet.

How do I do the right thing?
Always follow our approved booking process – see our instructions for travel and expenses.

A travel request is needed for all travel and must be approved by a manager. Always try to travel in the most cost-effective manner – our normal practice is to book economy and use agreed standard service levels, e.g. for hotels and car rental. Use all types of bonuses or compensation from frequent traveler schemes, or loyalty cards connected to business trips, solely for future business trips.

Your personal safety is of paramount importance while traveling. Read our travel security support pages on the Intranet and understand the current travel risks – travel to high-risk rated countries is restricted and requires approval from your manager.

Prepare for your trip and familiarize yourself with your destination beforehand, making a note of contact details for hotels, local contacts and our travel security support so you find help quickly if you need it. Control Risks also support us with a mobile application and phone number. Always stay alert while traveling so you can act according to the situation.

You also need to be careful with our company documents and other sensitive information. Discussions, telephone calls, documents and presentations can be easily overheard or read by others while traveling, so keep a low profile and avoid exposing company identification or mentioning the names of our colleagues and companies in conversations. Use screen protection on your laptop screen to keep information private.

For all business travel, you should behave as an ambassador of our company – gathering information about your destination before arrival can help you to respect local culture and habits. Never buy sexual services while on a business trip, neither during or outside of working hours.

IN PRACTICE

Before you make any travel arrangements, consider first if virtual collaboration would be enough. Video conferencing, teleconferencing and online meeting tools can save money, avoid the disruption and downtime of travel, and reduce our impact on the environment.

It's not always necessary to travel for a meeting but be realistic – if you need to go, you need to go.

When planning group travel, think about whether it really makes sense for everyone to go. If it does, plan the trip well in advance to give people enough time to book tickets. When people will be traveling from multiple locations, always choose a location that generates the lowest total travel cost.

Read and keep a copy of our travel insurance information and policy number, making a note of your local travel agency's phone number in case you need it while traveling. Always try to avoid unnecessary changes to travel plans if they will cause additional costs.

Three key things

- 1 You are representing the company when traveling for business
- 2 Travel is not always necessary – consider virtual collaboration and think environmental friendly options
- 3 Follow our approved process and preferred suppliers when booking travel



DON'T LAUNDER MONEY

MONEY LAUNDERING

By following standard processes and being transparent in all our financial activities we can make sure we earn all our revenue in ethical and legal ways.

Three key things

- 1 We carry out all financial activities in a transparent and ethical way
- 2 We don't engage in deals that involve unconnected parties, unusual payment methods or abnormal terms and conditions
- 3 We carry out due diligence on third parties before entering into any business deal

DEFINITION

Money laundering is a term used to describe the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have come from a legitimate source.

DO THE RIGHT THING

What does this mean for Telia Company?
We are careful to carry out all our financial activity transparently and ethically.

This means we never deal with suspected criminals, assist with the acquisition or control of criminal property, or falsify or destroy relevant documents. Nor do we take part in deals that involve unconnected parties, unusual payment methods or abnormal terms and conditions.

When engaging with current or potential customers or suppliers, we do so always in professional and non-extravagant ways.

How do I do the right thing?
Carry out all deals and financial activity with complete transparency and in line with standard processes.

Always report suspicious transactions and potential or actual money laundering, and perform due diligence on third parties before entering into a business deal.

Find out more

You can find out more, raise concerns, or report potential misconduct by contacting Group Ethics and Compliance or your local Ethics and Compliance Officer.

ENVIRONMENTAL RESPONSIBILITY

We design our networks and deliver our services for minimal environmental impact. We also help our customers and suppliers to reduce their impact on the environment.

- Three key things
- 1 Look for opportunities to reduce energy use, greenhouse gas emissions and waste
 - 2 Reducing our environmental impact can also help us reduce costs
 - 3 Consider the environmental impact of your business decisions

DON'T WASTE RESOURCES

DEFINITIONS

Environmental impact is the effect on the environment resulting from a product or service. The impact should be considered for the whole life cycle of the product – from production to use to end of life treatment.

Greenhouse gas emissions are the gases that cause global warming. These should be kept to a minimum.

DO THE RIGHT THING

What does it mean for Telia Company?
Our key environmental impacts are energy use, greenhouse gas emissions and waste. We can reduce these impacts by building energy efficient networks and, where possible, using renewable energy such as *green electricity* and solar power, instead of fossil fuels such as diesel, gasoline and natural gas.

We minimize and recycle waste properly, and develop and deliver services that help our customers reduce their environmental impact.

And by purchasing only from environmentally responsible suppliers, we can further reduce the environmental impact associated with our business.

How do I do the right thing?
Consider the short and long-term environmental impact of your business decisions – the cheapest solution is often not the best from an environmental perspective.

Aim to do the three Rs – Reduce, Reuse and Recycle – by using less paper and electricity, reusing equipment and recycling waste.

To avoid the environmental impact and expense of travel, make virtual collaboration your preferred option. If you really need to travel, consider commuting or going by train rather than flying or driving.

IN PRACTICE

What can I tell a customer who asks if our services are environmentally friendly?
Our services help both consumers and business customers to interact remotely, with less environmental impact than travel. They also enable smarter ways of working, and more efficient processes with lower environmental impact. Our carbon footprint is very low, mainly because we purchase *green electricity* in Sweden and region Europe. We do not have a *green portfolio* – all of our services are green.

How does environmental responsibility help reduce our costs?
Resources like electricity, gasoline and diesel are not free – if we use less, we reduce our costs. If we reduce waste this means lower costs for waste management. By improving the recycling of the waste, we improve the possibility of reusing and reselling things like handsets that customers hand in to us.

What does environmental responsibility mean for everyday work?
We are implementing the ISO 14001 environmental management system – it's often a requirement in tenders and is a great tool for managing environmental impacts in a structured way. This means we constantly evaluate and set targets for our major environmental impacts, including energy efficiency, emissions and how we manage

Find out more

For more information, see our Environmental Policy or contact sustainability-group@teliacompany.com.



STAND UP FOR WHAT'S RIGHT

SPEAKING UP

We support a culture that encourages every individual to speak freely – a culture that safeguards human rights, employee dignity, and health and safety. We provide a safe, secure and confidential way to express concerns and questions when the usual ways are unavailable or inappropriate.

HOW DO I DO THE RIGHT THING?

Always react quickly if you suspect or witness non-compliance with respect to our Code.

If you have concerns about the potential misconduct of a supplier, customer or other business partner, or about how we conduct business within Telia, you should reach out initially to your manager, HR, the legal department, Group Ethics and Compliance or your local Ethics and Compliance Officer.

If you have a more serious concern, you can also use the Speak-Up Line.

THE SPEAK-UP LINE

The Speak-Up Line is an easy, secure and confidential channel where you can raise a concern or report possible wrongdoing.

You can make a report anytime, 24/7 without fear of retaliation. You have the option to remain anonymous but if you choose to disclose your identity, feel assured that your report will remain confidential.

You can access Speak-Up Line and find more information at www.speakupline.ethicspoint.com. You can also email the Special Investigations team at speak-up-line@teliacompany.com.

WHAT HAPPENS ONCE I SUBMIT A REPORT?

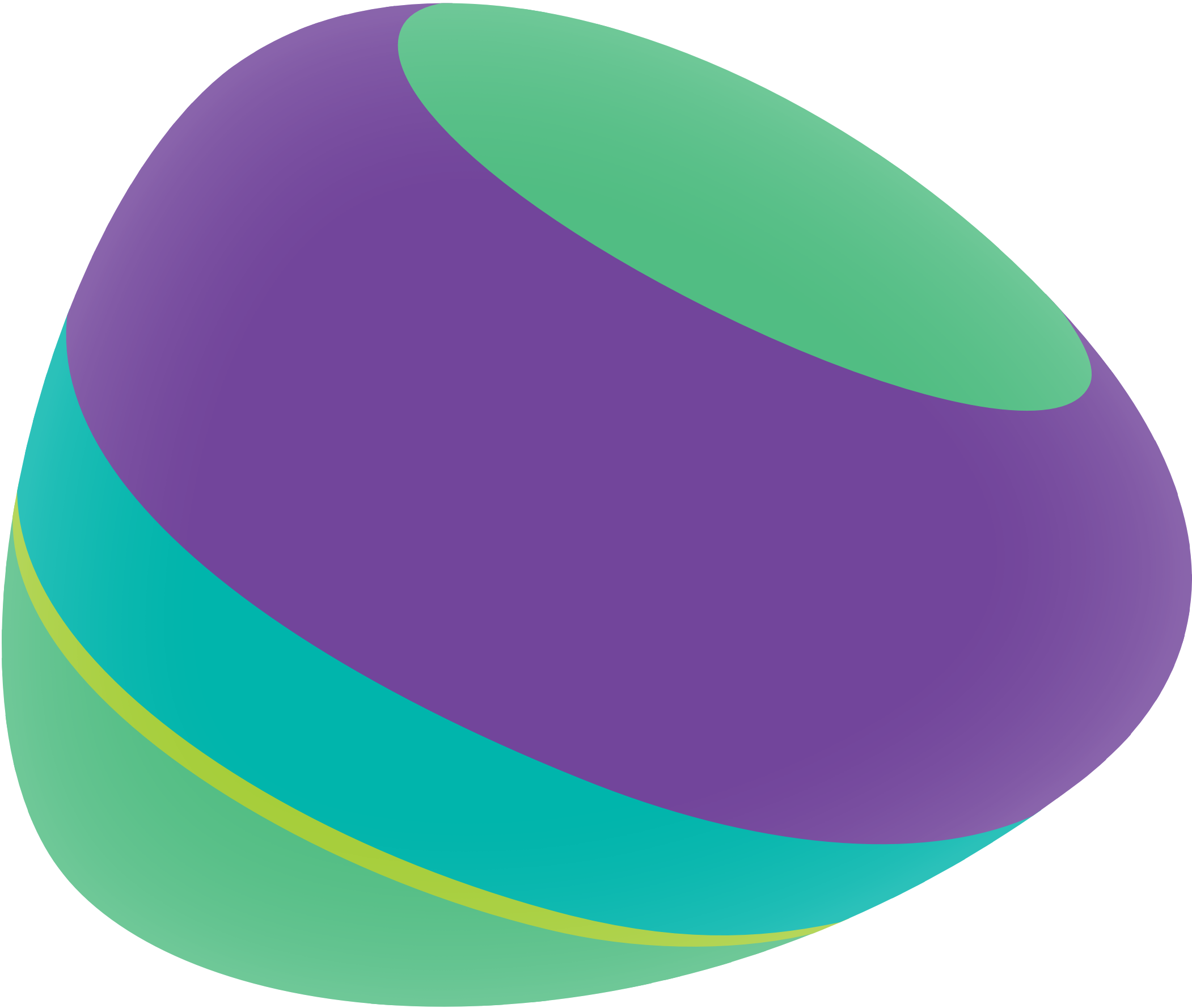
The Special Investigations team will review the information you've provided and take appropriate steps. You will get a report number that lets you see what steps have taken place and contact the investigator

All communications are anonymous and held in total confidence – our Code of Responsible Business Conduct prohibits any retaliation against whistle-blowing.

WHAT IS RETALIATION?

Retaliation is the act of making an employee afraid to complain or assert their rights. A transparent work culture depends on us all feeling comfortable that we can speak up without fear, so we do everything we can to support this.

In particular, we don't tolerate any attempt to sanction, disadvantage or discriminate against anyone who raises a concern or cooperates in a company investigation. We'll also take action, including possible termination of employment, if a manager intentionally or unintentionally leaks the identity of a whistle-blower.



**BY REPORTING
WRONGDOING,
YOU CAN MAKE
THIS AN EVEN
BETTER PLACE
TO WORK**

**SPEAK-UP-LINE@
TELIACOMPANY.COM**



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