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# BUSINESS PARTNER CODE OF CONDUCT

ENSURING ETHICAL BUSINESS CONDUCT AT THE HIGHEST STANDARDS

Tele2 is committed to conducting its business at the highest ethical levels. We have adopted this Business Partner Code of Conduct (hereinafter “the Code”) to ensure all Business Partners are aware of what is expected from them.

Tele2 requires all Business Partners to:

- Read and understand the Code;
- Sign a written or digital acknowledgement that they have done so; and
- Ensure that both the content and the spirit of the Code are acted upon.

[Information Classification: PUBLIC]

Version Table

Revision	Date	Prepared and approved by	Information
1 (v.1.1)	2018-11	Prepared by Marc Peeters, Head of Compliance Approved by Anders Nilsson, CEO	-
2 (v.1.2)	2021-06	Prepared by Jakob von Döbeln, Head of procurement Approved by Kjell Morten Johnsen, CEO	Updates to reflect a higher level of ambition and references to added policies

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## Introduction

At Tele2, we believe that the success of the company depends on the success of the societies in which it operates. Sustainable growth in society and sound business practices go hand in hand. In order to maintain a sustainable business model and help build a better society, we have to take responsibility for the impact our operations have on the world around us. Business Partners are an important part of our operations, and therefore we require them to join us in our efforts.

Tele2's ambition is that sound business practices shall prevail throughout our operations and daily business, which is why Tele2 has chosen to approach sustainability in the same way as we do all our business.

This Business Partner Code of Conduct is based on the Tele2 Code of Conduct that applies equally to Tele2, its employees, Leadership Team and Board of Directors. This document refers to principles Tele2 aims to adhere to. The guidance provided shall apply in an equal manner to Business Partners, unless the context clearly determines otherwise. All Business Partners are required to comply to this Business Partner Code of Conduct, and breaches hereof may result in Tele2 terminating all agreements with such Business Partners.

### Basis of the Code

The code is based on the ten principles provided by the United Nations (UN) Global Compact, of which Tele2 is a signatory. The code encompasses the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) 8 core conventions, the United Nations Convention Against Corruption, the Rio Declaration and the United Nations Convention on the Rights of the Child article 32.

For further details please refer to Appendix 1.

### Scope of the Code

It is important that goods and services handled by Tele2 are produced and provided in an ethical way. Therefore, Tele2 expects this Code to be applied and upheld in the organisation of all its Business Partners (meaning: affiliates, suppliers, sub-suppliers and vendors to Tele2), regardless of whether they deliver services or goods. The Code applies to all of the Business Partners managers, employees and workers, whether permanent or temporary, apprentices or contracted through an employment agency.

### Legal compliance and the Code

Tele2 complies with the laws of each country in which we operate. This Code sets up a minimum requirement. If provisions in other laws, be it local, national or international, have a more stringent position to sustainability matters mentioned in this Code, those shall be observed and complied with. In situations where neither the law nor the Code gives guidance, the UN Global Compact principles shall prevail. In cases of conflict between this Code and a mandatory (local) law, the latter shall prevail.

## Safety of products and services

Tele2 wins customers and builds long-term relationships by providing cost efficient and good quality services. This is done by demonstrating honesty and integrity in all interactions. Our marketing and advertising, expressed in communications or by employees, shall be accurate, truthful and comply with mandatory laws.

### Customer integrity

In the course of its operations, Tele2 has access to customer data for processing and storing. When handling data, Tele2 and its Business Partners shall take into account the Tele2 customers' rights to maintain personal integrity and privacy.

Tele2 complies with applicable laws and regulations on the freedom of speech, the right to privacy and personal integrity as well as on personal data retention. Tele2 will endeavour to prevent any unauthorized access to personal information. Tele2 does not process customers' personal data other than as allowed by applicable legislation. Tele2 should be trusted by customers and employees to handle their data, and can only achieve this in cooperation with its Business Partners.

### Customer safety

Tele2 actively works to prevent fraud and abuse of its communications services. Therefore, Tele2 offers tools to prevent exposure to unwanted content. We are particularly careful in protecting the safety of children and young adults in this regard.

## Exposure to electromagnetic fields

When in use, electric equipment emits radiation and creates electromagnetic fields (EMF). In handling EMF related to Tele2's networks, Tele2 and its Business Partners follow recommendations made by the relevant authorities.

## Procurement decisions

Tele2's contractual relationships with suppliers and vendors and dealers are important elements of the company's success. Supplier and vendor selection, and all other procurement decisions, must be made objectively and in Tele2's best interests, striving for the best deal by evaluating costs, requirement fulfilment, expected delivery capability, quality and other relevant factors.

Tele2 requires that business decisions are made without any unjustified influence from a third party. Suppliers and vendors which are proven to attempt to unduly influence Tele2's procurement decisions will be excluded from any future transaction with Tele2.

## Business integrity

### Anti-corruption

Tele2 employees and members of the Board of Directors may not offer, ask, give or accept, directly or indirectly, any undue advantage for personal gain to or from any third party, unless it can be constituted as being within the boundaries of accepted business practices such as representation and reasonable hospitality given in the ordinary course of business. Business Partners are expected to adhere to the same standards in relation to the work they do for Tele2.

In most countries, gifts or benefits to government employees or public officials are considered a violation of law. Business Partners must not offer money or any gift, at their own initiative or on behalf of Tele2, to an official or employee of a governmental entity, except for symbolic gifts of insignificant monetary value, provided this is allowed by law.

### Fair competition

Tele2 is firmly committed to fair competition and open markets. One of the foundations for our success has been the break-up of monopoly power. We remain firm believers that free and fair competition works in our favour allowing Tele2 to provide expected quality and cost-efficient communication services to our customers. Accordingly, Tele2 and its Business Partners are expected to comply with competition laws and for example not engage in collusive practices or monopoly foreclosures.

### Conflict of interest

When business decisions are made by Tele2, conflict of interest should be avoided, so that decisions are always in the best interest of Tele2 and its Business Partners. Personal relations or considerations may never cause to influence Tele2's decision making. This includes not only potential gains given to Tele2 employees, but also to relatives and friends of Tele2 employees. Business Partners are expected to identify any possible conflict of interest in their (prospective) relationship with Tele2, and inform Tele2 of such conflicts.

Business Partners need to be aware that, to avoid risk of conflict of interest, the following applies to Tele2 employees:

- Employees may not, without the company's written consent, work outside Tele2 in any capacity (e.g. employment, consultancy, Board membership).
- If there is any risk, however small, for conflict of interest, employees are expected to immediately inform their manager.

### Financial reporting

Tele2 is required to follow strict accounting principles and standards (IFRS), to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with legislation. Business Partners must act in a way that supports Tele2's efforts in this area.

The integrity of Tele2's financial records is critical to the operation of Tele2's business and is a key factor in maintaining the confidence and trust of our shareholders. Tele2 must ensure that all transactions are properly recorded, classified and summarised in accordance with Tele2 accounting policies. Business Partners may not

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cause Tele2 employees to enter or remove information in the company's books or records that intentionally hides, misleads or disguises the true nature of any financial or non-financial transaction or result.

### Corporate Governance

Tele2 strongly believes in transparent and consistent corporate governance practices and abides with the applicable regulations and standards in each of its geographical markets. This protects the legitimate interests of all Tele2's shareholders and stakeholders, and Tele2 expects its Business Partners to act in support of these efforts.

## Treating people with respect

### Fair working conditions

All employees of Tele2 and its Business Partners are entitled to fundamental human rights which shall be known, understood and respected and be applied equally. No one shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. Forced, exploited or bonded labour is strictly forbidden. Employees shall not be required to lodge deposits or original identity papers as a condition for employment.

Employees shall not be forced to work more than the limits on regular and overtime hours allowed by the laws of the country in which they are employed. Overtime shall be compensated at no less than the legally required rate. All employees shall have contracts specifying the terms of employment. Children under the minimum working age established by local law or fifteen (15) years, whichever is greater, shall not be used as part of the labour force. Employees under eighteen (18) years shall not be engaged in hazardous or heavy work, or on night shifts.

The rights of employees to freely associate and to bargain collectively, in accordance with the laws of the countries in which they are employed, shall be recognised and respected.

### Child Protection

To support the protection of children's rights, Tele2 gives guidance to its employees regarding child protection. Tele2 employees are under no circumstance allowed to contact or to meet children for any kind of sexual purpose. They do not visit bars, restaurants or hotels where children are sexually exploited in any way, and report suspected cases of sexual exploitation of minors to the police immediately. Tele2 applies the same standard online as it does offline, and does not allow employees possessing, or searching for, materials documenting sexual abuse of children.

Business Partners are expected to adhere to the same standards in relation to the work they do for Tele2.

### Diversity and Inclusion

All employees of Tele2 and its Business Partners are protected by the fundamental right not to be discriminated against. They shall not be subject to discrimination, whether active or by means of passive support, whether based on ethnicity, national origin, religion, disability, gender, sexual orientation, marital or parental status, union membership, political affiliation or age.

### Compensation and benefits

No employee of Tele2 or its Business Partners will be paid less than the minimum total wage required by applicable national law, including all mandated wages, allowances and benefits. All employees shall have the right to equal pay for equal work, as well as periodic holiday with pay.

### Occupational health and safety

Safety at work is a prioritised concern of Tele2's and therefore it takes adequate steps to prevent accidents and injury to health, by minimising the causes of hazards inherent in the working environment and by providing appropriate safety equipment. The same is expected from Business Partners.

## Environment

The Business Partner shall apply a precautionary approach towards environmental and climate matters, and to protect biodiversity and ecosystems. Business Partners running operations with high environmental impact, e.g., production facilities and construction of network infrastructure, shall undertake initiatives to promote greater environmental responsibility and encourage the development of environmentally friendly technologies.

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### Environmental management

Efforts to reduce and optimize the consumption of energy, water and materials shall be promoted. If available in the country, renewable energy sources shall be prioritized. In order to minimize waste generation, the Business Partner shall strive to reduce, reuse and recycle materials and products, in that priority order. Hazardous waste and effluents shall be handled appropriately. Emissions of greenhouse gases should be measured, monitored and a plan to minimize such should be developed.

### Responsible and safe products

The Business Partner should apply the substitution principle for chemicals that can be replaced by those that are less hazardous, and have a process in place to identify Substances of Very High Concern ([SVHC](#)) present in products delivered to Tele2, in accordance with the REACH (EC1907/2006) regulation. Electric and electronic products delivered to Tele2 must not contain any of the following substances: lead, mercury, cadmium, hexavalent chromium, PBBs, PBDEs, DEHP, BBP, DBP or DIBP, in accordance with the Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS) directive. The Business Partner shall work proactively to ensure that minerals (such as but not limited to tungsten, tantalum, tin, and gold) in its products and its supply chain are responsibly sourced. When applicable, the Business Partner shall have a policy and due diligence process in place, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas<sup>1</sup>.

## Reporting violations

It is the responsibility of Business Partners to make sure that both the content and the spirit of this Code are communicated, understood and acted upon within their organisations and to encourage employees to reveal behaviour that may be non-compliant with the Code. Explicit or implicit approval of questionable actions will not be tolerated.

As soon as any person is informed of, or suspects, any activities, taking place at Tele2 or at a Business Partner, that may be in violation of this Code, it is this person's responsibility to report it.

In order to report via the Whistle Blower channel, please use one of the following alternatives:

- E-mail to [report.violation@tele2.com](mailto:report.violation@tele2.com)
- Send a letter to the address "Tele2 Whistleblower, Att. General Counsel, Torshamnsgatan 17, SE-164 40 Kista Sweden".
- Use the direct telephone contact at +46 701 620 062.

Reports will be received by the responsible persons in the Tele2 Board of Directors and the Tele2 Security function. All these channels are designed, set up and operated in a way that ensures the confidentiality of the whistleblower, and to prevent non-authorized staff members from having access to the reports submitted through these channels. For up-to-date information on the process of whistle blowing (e.g. the responsible persons who will receive the report), please refer to the Tele2.com website.

Anonymous reports will be accepted, but contact details to the reporting person are appreciated.

## Governance

This Code has the authority of the Tele2 AB Board of Directors and the Leadership Team.

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<sup>1</sup> <https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas>

## Appendix 1 – Basis for the Business Partner Code of Conduct

The code is based on the ten principles provided by the United Nations (UN) Global Compact<sup>2</sup>. The code encompasses the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) 8 core conventions, the United Nations Convention Against Corruption and the United Nations Convention on the Rights of the Child article 32.

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption.

### Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

### Labour Standards

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

### Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

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<sup>2</sup> The UN Global Compact principles enjoy universal consensus and are derived from

- the Universal Declaration of Human Rights,
- the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work,
- the Rio Declaration on Environment and Development,
- the United Nations Convention Against Corruption.



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### United Nations Universal Declaration of Human Rights

Articles 1–2 establishes the basic concepts of dignity, liberty, and equality.

Articles 3–5 establishes other individual rights, such as the right to life and the prohibition of slavery and torture.

Articles 6–11 refer to the fundamental legality of human rights with specific remedies cited for their defence when violated.

Articles 12–17 establishes the rights of the individual towards the community, including freedom of movement.

Articles 18–21 sanctions spiritual, public, and political freedoms, such as freedom of thought, opinion, religion and conscience, word, and peaceful association of the individual.

Articles 22–27 sanctions an individual's economic, social and cultural rights.

Articles 28–30 establishes the general means of exercising these rights.

### International Labour Organisation's (ILO) 8 core conventions

1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
3. Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol )
4. Abolition of Forced Labour Convention, 1957 (No. 105)
5. Minimum Age Convention, 1973 (No. 138)
6. Worst Forms of Child Labour Convention, 1999 (No. 182)
7. Equal Remuneration Convention, 1951 (No. 100)
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

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United Nations Convention Against Corruption

The convention covers five main areas that includes both mandatory and non-mandatory provisions:

1. Preventive measures
2. Criminalization and law enforcement
3. International cooperation
4. Asset recovery
5. Technical assistance and information exchange

United Nations Convention on the Rights of the Child article 32

1. States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

2. States Parties shall take legislative, administrative, social and educational measures to ensure the implementation of the present article. To this end, and having regard to the relevant provisions of other international instruments, States Parties shall in particular:

(a) Provide for a minimum age or minimum ages for admission to employment;

(b) Provide for appropriate regulation of the hours and conditions of employment;

(c) Provide for appropriate penalties or other sanctions to ensure the effective enforcement of the present article.