

Document name	Conflict Minerals Policy
Policy holder	Viktor Wallström, EVP Communications & Sustainability
Other interest holders	EVP General Counsel, Head of Sustainability, Head of Procurement
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Conflict Minerals Policy

ENSURING ETHICAL BUSINESS CONDUCT AT THE HIGHEST STANDARDS

Tele2 is committed to conducting its business at the highest ethical levels. As a telecommunications company, managing Tele2's risks in relation to conflict minerals is part of our supply chain compliance efforts. While Tele2 does not produce physical products that can contain conflict minerals, Tele2 sees that this is an important issue for our supply chain. This policy contains Tele2's commitment to not use conflict minerals in products we use or sell, and describes Tele2's approach to responsible sourcing of minerals.

Version Table

Revision	Date	Prepared and approved by	Information
1 (V.1.0)	2021-05	Prepared by Erik Wottrich, Head of Sustainability Approved by Kjell Morten Johnsen, CEO	-

Our commitment

Tele2 recognizes the risks connected to the sourcing of certain minerals in conflict regions and high-risk areas, and the associated human rights violations, conflict and environmental degradation which result from the trade with these minerals. Therefore, Tele2 is committed to not source products containing conflict minerals which directly or indirectly finance or benefit armed groups or security forces in conflict regions and high-risk areas, such as the Democratic Republic of Congo (DRC) and adjoining countries. Tele2 commits to promote responsible sourcing of minerals, including conflict minerals, and condemns all human rights abuses related to the extraction, transport, or trade of conflict minerals. Tele2 shall strive to eliminate the use of conflict minerals in products we use or sell through, for example, taxation of mine sites, transport routes and trade points.

Scope

Conflict minerals refer to the metals Tantalum, Tin, Tungsten and Gold (3TG), or their derivatives, regardless of whether or not their production or trade has actually supported conflict. Tele2 does not directly source raw materials or refine minerals but many products Tele2 uses or sells contain 3TG, making conflict mineral issues highly relevant for our business.

Managing our risks

Working towards these commitments, Tele2;

- Incorporates our commitment to sustainable sourcing of products containing conflict-free minerals in this policy as well as our Environmental Policy, and our Business Partner Code of Conduct;
- Requires that our suppliers sign and adhere to our Business Partner Code of Conduct which contains requirements on conflict minerals' policy commitment and due diligence process;
- Demands that Business Partners work proactively to ensure that minerals (such as, but not limited to, tungsten, tantalum, tin, and gold) in their its products and supply chain are responsibly sourced. When applicable, the Business Partners 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, and communicate their policy to sub-suppliers;
- Identifies products used or sold by Tele2 that contain 3TG and analyses risks related to conflict minerals by appraising the maturity of our Business Partner's approach and processes. In cases where Tele2 has a higher degree of influence over manufacturing of a product, engagement with the Business Partner shall be more active;
- Verifies the smelter and refinery due diligence and audit processes of our Business Partners;
- Requires suppliers to immediately address non-compliances with regards to conflict minerals and work with our suppliers on corrective actions where needed;
- Encourages suppliers to participate in industry cooperation to eliminate the use of conflict minerals and further procurement methods that are sustainable;
- Terminates relationships with Business Partners who do not adhere to the requirements of our Business Partner Code of Conduct or do not address non-compliances in a reasonable time after notification from Tele2.