

Document name	Human Rights Policy
Policy holder	Stefan Backman (General Counsel)
Other interest holders	Head of Internal Control, Head of Sustainability, Head of Procurement
Policy last revised (date)	May 2021
Version	1.0
Policy approved by (name / date)	Kjell-Morten Johnsen (CEO) with the Group Leadership Team / 2021-06-01
Policy valid as of	June 2021

# Human Rights Policy

ENSURING RESPECT FOR HUMAN RIGHTS THROUGHOUT OUR ORGANIZATION AND SUPPLY CHAIN

This human rights policy clarifies Tele2's commitment to respect human rights as set out in Tele2's Code of Conduct and explains how Tele2 works to identify, assess and manage human rights impact related to Tele2's operations.

EVP General Counsel carries the overall responsibility for Tele2's human rights work. This policy has been approved by the CEO and the Group Leadership Team.

## Version Table

Revision	Date	Prepared and approved by	Information
1 (V.1.0)	2021-05	Prepared by Stefan Backman, EVP General Counsel Approved by Kjell Morten Johnsen, CEO	-

## Our commitment

Tele2 believes that all people are entitled to basic human rights and recognizes its responsibility to respect and support human rights in all its business operations, including in the supply chain and communities in which Tele2 operates. This means that Tele2 avoids causing or contributing to negative human rights impact through the business operations, as well as through activities to which Tele2 are directly linked via a business relationship. Tele2 also commits to use its influence as a leading market participant and use its leverage in business relationships to promote the fulfilment of human rights.

Tele2 respects and promotes all internationally recognized human rights outlined in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the principles concerning fundamental rights in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work and, where applicable, additional standards relating to the rights of specific groups and populations.

## Scope

The Human Rights Policy applies to all employees of Tele2, including the leadership team and Board of Directors. Equally, Tele2 expects all business partners, suppliers and any other third party representing Tele2 to uphold the respect for human rights as well as adhere to the requirements specifically set out in Tele2's Business Partner Code of Conduct. For the purpose of this policy, Tele2 means Tele2 AB and all of its majority owned or controlled subsidiaries.

## Salient human rights impact

Tele2 acknowledges that there are potential human rights impact throughout our entire value chain. Based on our geographical presence and the industry in which we operate, we consider the following to be Tele2's most salient human rights impact, where children are identified as a particularly vulnerable group:

- Anti-discrimination
- Children's Rights
- Freedom of Expression
- Freedom of the Media
- Labour Rights
- Gender Equality
- Privacy Rights

## Managing human rights impact

Tele2 seeks to identify, assess and manage adverse human rights impacts through the policies and procedures that guide Tele2's operations.

In practice, Tele2:

- integrates the respect for human rights in everyday operations through the Code of Conduct, Business Partner Code of Conduct and this Human Rights Policy;
- encourages business partners and suppliers to respect and promote human rights in their own operations;
- carries out risk assessments to identify negative human rights impact in Tele2's supply chain;
- communicates this Human Rights Policy to all employees and external stakeholders and describes our human rights work in our annual sustainability report;
- supports employees and partners in understanding human rights through relevant communication and training;

## [Information Classification: PUBLIC]

- endeavours to engage proactively with business partners, governments and other stakeholders to uphold the highest standards of human rights throughout the value chain;
- strives to promote and ensure channels for transparent and open communication where all internal and external stakeholders can raise concerns without fear of retaliation or reprisal, and provides fair investigation and grievance mechanisms;
- recognizes the impact of climate change on people's lives and opportunities to attain their human rights and thus works to reduce Tele2's environmental impact by being climate neutral and using technology to be a driver of sustainable development;
- endeavours to find opportunities to engage and use leverage in business relationships to proactively respect and support human rights; and
- are signatories and incorporates the ten principles of the UN Global Compact in our strategies, policies and procedures;

During 2021–2022, Tele2 is developing a process to carry out ongoing human rights due diligence. This process will include implementing processes in Tele2's existing business operations to identify and assess industry-specific human rights risks, conduct stakeholder dialogues with affected rightsholders and provide effective remedy for negative impact.

## Grievance mechanism

Tele 2 has a whistleblowing channel in place to enable employees to report violations of Tele2's policies, including this Human Rights Policy. Employees can also go to their manager or use the other channels described in Tele2's Whistleblowing Policy. Employees that report in accordance with the Whistleblowing Policy qualify for protection granted by that policy.