

Policy holder	EVP Communications and Sustainability
Other interest holders	Head of Sustainability
Policy last revised (date)	December, 2024
Version	2.0
Policy approved by (name / date)	Tele2 Group Leadership Team and Board of Directors?
Policy valid as of	December, 2024

# Human Rights and Due Diligence Policy

Ensuring respect for human rights and good environmental practices throughout our organization and value chain

This Human Rights and Due Diligence 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 impacts related to Tele2’s operations and business partners.

The Executive Vice President Communications and Sustainability carries the overall responsibility for Tele2’s human rights work. This policy has been approved by the Group Leadership Team and Board of Directors.



## 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	-
2 (V.2.0)	2024-12	Review and update by Erik Wottrich, Head of Sustainability, and Rosanna Norman, Social Sustainability Manager	Updates of the policy in its entirety to reflect current processes and activities within human rights, including e.g. a clearer description of Tele2's due diligence process.

Objective and scope.....	4
Our Commitment .....	4
Our Salient Issues.....	4
Due Diligence Process .....	4
Impact assessment.....	4
Risk management.....	5
Monitoring effectiveness.....	5
Remediation.....	5
Implementation.....	5
Communication.....	5
 Grievance Mechanisms.....	 5
Governance.....	5

## Objective and scope

This policy articulates Tele2's commitment to respecting human rights. This entails implementing a due diligence process aimed at preventing, mitigating, or ceasing adverse human rights impacts throughout the organisation and business relations. The commitment encompasses all internationally recognised human rights including, but not limited to:

- The International Bill of Human Rights
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and core International Labour Standards
- The United Nations Convention on the Rights of the Child

Tele2's commitment is also guided by the following guidelines:

- The Children's Rights and Business Principles
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- The United Nations Global Compact

Tele2 respects international standards and principles that outline and protect the rights of specific individuals and vulnerable people or groups, including but not limited to women, indigenous people, people with disabilities, and migrant workers and their families.

The Human Rights and Due Diligence Policy applies to all employees of Tele2, including the leadership team and Board of Directors. We expect our employees, including part-time and temporary employees, to respect human rights in a manner that is consistent with this policy. As human rights issues are systemic, we must also rely on the concerted, continued, and honest efforts of all stakeholders. We expect our business partners to comply with applicable local laws and regulations and our Business Partner Code of Conduct. For the purpose of this policy, Tele2 means Tele2 AB and all of its majority owned or controlled subsidiaries.

## Our Commitment

We are committed to respect and uphold the human rights of every individual affected by our business activities including our customers, employees, workers in our value chain, and local communities. Conducting business in an ethical, legal, and environmentally and socially responsible manner is an integral part of Tele2's operations. Similarly, Tele2 is dedicated to a strong corporate culture that includes qualities such as honesty, respect, and doing business with integrity. We cannot realise this commitment and contribute to a sustainable tomorrow without acting with respect for human rights in every aspect of our business.

## Our Salient Issues

There are human rights issues that are particularly relevant to our business, industry, and value chains. This understanding is based on our human rights impact assessments and engagement with internal and expert external stakeholders. Among the broader human rights issues that we identified are (in alphabetical order):

- Child labour
- Freedom of expression
- Forced labour
- Labour rights
- Non-discrimination
- Privacy rights

## Due Diligence Process

Tele2 is committed to conducting ongoing human rights due diligence. Our approach is guided by the UNGPs and OECD, including meaningful engagement with internal and external stakeholders, and due consideration of those parties and/or persons potentially and actually affected and/or their legitimate representatives.

### Impact assessment

Tele2 operates an appropriate risk management system which seeks to identify and assess actual and potential adverse human rights impacts in our operations and value chain. Identified risks will be weighted and prioritised

based on severity and likelihood and managed accordingly. Tele2 also regularly reviews modern slavery and human rights risks associated with our business, including new business acquisitions and existing operations.

## **Risk management**

We implement processes and controls to evaluate and mitigate risks, including value chain risks and regulatory risks. Where our due diligence process identifies that Tele2 can cause or contribute to adverse impacts, Tele2 will take preventative actions to reduce the likelihood of the risk. If Tele2 is directly linked to a potential impact through our business relationships, we will seek to prevent the risk by ensuring compliance with our Code of Conduct.

## **Monitoring effectiveness**

Tele2 annually reviews the due diligence process and salient risks, monitor and assess the effectiveness of implemented actions, and publicly report on our efforts. To ensure respect for human rights, we aim to continually enhance our risk-based due diligence processes, including supply chain assessments and prevention measures.

## **Remediation**

In case of a human rights violation, we promote access to remedy for any victims of human rights abuses connected to our operations. Where we identify that we have caused or contributed to adverse impacts, we commit to providing for or cooperating in remediation for affected individuals or groups. In cases where negative impacts arise out of our business relations, we will exercise our leverage, and increase such leverage where necessary, to address the adverse impacts.

## **Implementation**

Tele2's actions to respect human rights are integral to our day-to-day operations as demonstrated through the following measures that are imbedded into our operations:

- **Code of Conduct:** Tele2 integrates the respect for human rights in everyday operations through our Code of Conduct and supporting policy documents such as this Human Rights and Due Diligence Policy. We also periodically train and educate relevant employees on human rights.
- **Business Partner Code of Conduct:** Tele2 integrates respect for human rights in our business relationships through our Business Partner Code of Conduct. Tele2 expects all our suppliers and business partners to respect and address human rights issues in their own operations and supply chains in line with the Business Partner Code of Conduct.
- **Responsible procurement practice:** To verify compliance with the Business Partner Code of Conduct, Tele2 has established a procurement process that allows for identification and follow-up on risk suppliers. Tele2 verifies compliance with the Business Partner Code of Conduct through supplier self-assessments and on-site audits.
- **Children's rights:** Protecting and strengthening children's rights across our operations, value chains, products, and services, with a particular focus on safeguarding children's rights online.
- **Privacy rights:** Tele2 strives to always be compliant and process personal data in a responsible manner by ensuring the right to privacy and data protection throughout our business and in our services.

## **Communication**

Our human rights due diligence efforts are communicated to relevant internal and external stakeholders as well as in Tele2's Annual and Sustainability Report.

## **Grievance Mechanisms**

Tele2 encourages raising any concerns and reporting any activities which are not consistent with Tele2's policies or violations against regulations, including this Human Rights and Due Diligence Policy. Tele2 provides a whistleblowing service to enable anyone to report concerns. Employees can also report issues to their manager or use the other channels described in Tele2's Whistleblowing Policy.

All internal and external stakeholders can raise concerns without fear of retaliation or reprisal in accordance with the Whistleblowing Policy.

## **Governance**

This policy has the authority of the CEO and Group Leadership Team and the Board of Directors and is governed by the Executive Vice President Communications and Sustainability. The Human Rights Policy should be reviewed annually by the Head of Sustainability.

**Information Classification: Public**