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Environmental Policy

PROMOTING ENVIRONMENTAL PERFORMANCE AT THE HIGHEST STANDARD

At Tele2, our vision is to be the smartest telco in the world, creating a society of unlimited possibilities, and we believe that a smart telco is an environmentally sustainable business. Tele2's ambition is to lead in sustainability, meaning we incorporate sustainability in everything we do. We do not only want environmental sustainability to be integrated in our own organisation, but we also expect that our business partners and suppliers take action on reducing their negative environmental impact. We also want to encourage our customers to take environmental responsibility, and we want to lead the way towards a more environmentally sustainable society.



1. Objective and scope

For Tele2 it is important to ensure a low negative environmental impact through our entire value chain, which should prevail throughout our operations and our daily business. This Environmental Policy has been adopted to guide on how to make environmentally friendly decisions, and to ensure that environmental considerations are taken in all parts of our business. This Environmental Policy applies to everyone employed by Tele2, directly or indirectly. This includes members of the Board and the Leadership Team. For the purpose of this policy Tele2 means Tele2 AB and all its majority owned or controlled subsidiaries. The Environmental Policy also applies and should be upheld by parties upstream and downstream in the organisation's supply chain, for example affiliates, suppliers, and producers to Tele2, notwithstanding if the party delivers services or goods. Upstream value chain includes for example suppliers to procurement departments of products and services. Downstream value chain includes the stages from sales departments and retailers to final customers and end of life management for products.

2. Compliance

Tele2 shall comply with all applicable laws, rules, and regulations in the countries where we operate and shall strive to comply with industry standards and best practices. This Environmental Policy sets a minimum requirement. If provisions in other laws, regulations, or rules, be it local, regional, or international, have a more stringent position to the environmental matters mentioned in this Environmental Policy, those shall be observed and complied with. In cases of conflict between this policy and a mandatory local regulation, the regulation shall prevail. All employees are responsible to act in accordance with the policy.

3. Environmental management

3.1 The precautionary approach

Tele2 supports the precautionary approach towards environmental and climate matters and to protect biodiversity and ecosystems, thus minimising the negative environmental impact as much as possible.

3.2 Environmental integration

At Tele2 we recognise, monitor, and manage environmental issues and risks, which have or might have a significant impact on our organisation, throughout our entire value chain. These risks are integrated into our overall risk assessment and actions are taken to anticipate and mitigate these risks.

3.3 Environmentally friendly technology

Tele2 aims to reduce our resource consumption and emissions by implementing innovative technology. We invest in research and development of innovative solutions enabling the reduction of greenhouse gas emissions and with the potential to solve environmental issues. Tele2's products and services contribute to a more environmentally sustainable society, for instance by enabling unlimited connectivity, Internet of Things, and smart cities. By using Tele2's products and services our customers can reduce their negative environmental impact, for instance their greenhouse gas emissions and energy consumption.

3.4 Continuous improvement

At Tele2 we seek to continuously improve our environmental performance. Therefore, we monitor, measure, and reduce the environmental impact from our operations. As a means for achieving this, we apply both short-term and long-term targets as well as key performance indicators which are compared against previous years to display the development. The performance is communicated via our website and our sustainability report.

4. Environmental aspects

4.1 Renewable energy and energy efficiency

Tele2 has a pronounced strategy to increase our energy efficiency. Tele2 operations and networks should be the most energy efficient on the markets where we operate. Tele2 shall use electricity from 100% renewable sources and aspire to only use energy from renewable sources, and is committed to become a fossil fuel free company

4.2 Take action against climate change

Our long-term ambition is to have zero climate impact in line with the Paris Agreement as a result of our business. To achieve this, we shall take measures to significantly decrease greenhouse gas emissions in own operations as well as upstream and downstream in our value chain. We shall actively promote services, such as connectivity and IoT, to our customers which enables them to increase energy efficiency as well as reducing or avoiding emissions of greenhouse

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gases from their operations. We place strict environmental demands on all emitting parts of our operations such as transportation, travel, production, and IT infrastructure. The Tele2 Travel Policy outlines guidelines on how to minimize impact related to business travel.

4.3. Sourcing and use of products and services

Procurement is a significant part of the company's environmental impact. At Tele2 we shall incorporate environmental criteria such as eco-labelled and local products when sourcing products and services. Tele2 further works actively to manage and reduce the use of resources in our operations. In our daily operations, this means that we shall seek to reduce the use of unnecessary materials and resources through more efficient use.

4.3.1 Conflict minerals in electronic equipment

Responsible minerals sourcing from conflict-affected and high-risk areas are a material issue to our industry. It is relevant to Tele2 since the core of our business is operating networks, which consist of equipment that contain tungsten, tantalum, tin, and gold (3TG). We also resell equipment (handsets) containing 3TG materials. Our efforts regarding responsible minerals is based on our proximity to the issue. However, as an industry and individual company, we can through our buying power, have a meaningful influence. In this context, our due diligence means we verify the due diligence undertaken in the value chain by our direct business partners.

4.3.2 Chemicals and hazardous substances

Tele2 shall maintain an accurate inventory of all hazardous chemical containers, which are to be correctly labelled, stored, handled, and disposed of in a manner that limits exposure and damage to human health and/or to the environment. Material Safety Data Sheet (MSDS), shall be available for immediate access. Tele2 works in accordance with the following three important directives:

- In accordance with the REACH (EC1907/2006) regulation, and described in Tele2's Business Partner Code of Conduct, Tele2 requires its business partners to 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.
- The Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS) directive aims to reduce risks to humans and the environment by hazardous chemicals in electronic equipment and improve recycling of electronic equipment waste.
- The Waste of electrical and electronic equipment (WEEE) directive aims to decrease the negative environmental impact of unwanted electrical and electronic equipment at end-of-life disposal.

4.4 Responsible supply chain management

At Tele2 we incorporate environmental criteria in the procurement process when we evaluate and select suppliers and business partners. This applies to both existing and potential new business partners. Tele2 conducts dialogues with suppliers and business partners with the purpose of encouraging them to reduce and report their environmental impact.

4.5. Circular economy and responsible use of resources

In an effort to minimise Tele2's ecological footprint and cultivate sustainability, adopting practices that mitigate reliance on natural resources is imperative. Operating in a manner that emphasizes resource efficiency and responsible disposal of electronic equipment can significantly contribute to reducing environmental impact.

4.5.1 Circular economy

By applying a circular economy approach, Tele2 aims to maximize our resource utilization and to reduce the demand for virgin materials in our industry. In an effort to both mitigate negative impact and seize new business opportunities we endeavour to adopt a sustainability by design approach when developing our products and services, including reduced use of virgin materials, climate impact and prolonging the lifecycles for our products and services.

4.5.2 Waste

As part of the circular economy system, we strive to reduce, reuse, and recycle resources, in that priority order. What cannot be reduced, is reused, and what cannot be reused is recycled, with the goal of minimizing the amount of waste disposed and to eliminate toxic materials in circulation. When using resources, we shall apply the waste hierarchy in an aim to reduce and manage waste. We shall always use resources in a responsible and sustainable manner. This means that we shall avoid using resources excessively and when using resources, we shall use them as efficiently as possible.

4.5.3 Water

The main water abstraction and potential impact in Tele2's value chain is found in the upstream supply chain. We therefore require our business partners to take measures to protect marine ecosystems from pollution and damage, including minimizing the discharge of harmful substances into water, which is further specified in Tele2's Business Partner Code of Conduct. Tele2 acknowledges that fresh water is a scarce resource and shall foster responsible water stewardship in all our facilities, be they offices, warehouses, stores, or datacentres. We shall work to minimize our water consumption and ensure that all wastewater is treated correctly. Tele2 further commits to annually monitor and report on the water use in our operations.

4.5.4 Biodiversity

Tele2 acknowledges the telecommunication industry's dependency on environmental assets and ecosystem services in its direct operations and value chain. While Tele2 has limited land holdings it does have operations located by or near biodiversity sensitive areas. Tele2 follows local and international laws and regulations in all operations regulating the construction of infrastructure to mitigate potential negative environmental impact, including obtaining the necessary building permits and conducting environmental impact assessments to limit the risk of negative impact on local ecosystems from our construction.

4.6 Communication and knowledge sharing

Tele2 seeks to increase the employee awareness and knowledge regarding environmental impact through education and motivation. Tele2 shall ensure that all employees receive training in environmental issues. We further include our stakeholders in dialogues regarding environmental impact and welcome suggestions for improvement. We educate and disseminate knowledge regarding environmental impact, to both internal and external stakeholders.

4.6.1 Reporting

Tele2 believes in transparency, and regularly reports advancement regarding environmental performance, including progress towards our environmental targets, to our stakeholders both directly and via the annually issued sustainability report. Tele2 shall provide information regarding our greenhouse gas emissions, energy consumption and waste to our stakeholders, and shall report on environmental performance in scope 1, 2 and 3, and disclose to CDP.

5. Electromagnetic Fields

When in use, electric equipment emits radiation and creates electromagnetic fields (EMF). In handling EMF related to its networks, Tele2 follows recommendations made by the relevant authorities. This includes the EMF norms that are published by the World Health Organization, following the International Commission on Non-Ionizing Radiation Protection's guideline. At Tele2 we make sure that we are updated about the latest EMF research and spread this information to all relevant parts of our organization.

6. Governance

This policy has the authority of the Board of Directors and the Group leadership team and is governed by the Executive Vice President Communications and Sustainability.

The Environmental Policy is drafted and maintained by the Head of Sustainability under the responsibility and supervision of the Executive Vice President Communications & Sustainability. The Environmental Policy should be reviewed annually by the Head of Sustainability.

7. Violation of the Environmental Policy

Employees are required to report any violations of this policy. They can do so to their manager, or through the channels provided in the Whistleblowing Policy.