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CSO/Håkan Kvarnström

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GROUP SECURITY POLICY

BACKGROUND AND DESCRIPTION

Background

This Group Policy relates to Security and is a binding document for Telia Company AB and its Subsidiaries ("Telia Company").

Terms starting with a capital letter in this Group Policy are defined in the Delegation of Obligations and Authority.

Description

This is the Telia Company Group Security Policy stating the mandatory security requirements for the group.

Security is an integral part of sound group governance. The governance of security within Telia Company is coordinated by Group Security in cooperation with all parts of the organization. It aims to control, facilitate and implement well-balanced security measures throughout our operation.

SCOPE AND PURPOSE

Scope

This Group Policy applies to Telia Company AB and for its Subsidiaries and Joint Operations as their own binding policy. In addition, Telia Company works towards adopting this Policy's principles and objectives in all other operations in which Telia Company has ownership interests.

This Group Policy is part of the Group Governance Framework, which includes without limitation:

- a) Code of Ethics and Conduct, Purpose, Shared Values, Focus Areas, Strategy, Group Policies, and Instructions for the CEO as approved by the Board;
- b) Decisions made by the CEO, and Group Instructions and the Delegations of Obligations and Authority as approved by the CEO; and
- c) Group Guidelines as approved by the Heads of Group Functions.

There is a set of Group Instructions and Group Guidelines connected to this Group Policy.

Purpose

In Telia Company, security measures shall be characterized by appropriate security and risk awareness, prevention, preparedness, and the ability to respond to, and recover from, incidents and changes in the environment. The main drivers for security are:

- Protection of shareholders' value and the company's assets and investments
- Ensuring that customers' expectations and business agreements are met
- Ensuring that the business strategies and objectives are not jeopardized due to security risks
- Ensuring that laws and regulatory security related requirements are complied with (legal compliance).

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PRINCIPLES

The following principles shall apply for the activities under this Group Policy:

Telia Company shall implement security measures, which aims to balance risk exposure, business value, vulnerabilities and threats.

In order to protect business and shareholder value, measures must be taken to protect assets such as personnel, customers, information, IT infrastructure, internal and public networks, as well as office buildings and technical facilities. Information security is vital for ensuring reliable and secure access to information. Telia Company shall implement measures to prevent and detect disclosure of sensitive information to unauthorized parties. Special attention shall be given to information affecting user privacy.

Products, services, and key strategic and operational processes must continuously, throughout its life cycle, undergo thorough analysis to identify risks and threats affecting our business. The analysis aims to guide decision making and ensure proper implementation of security measures to meet compliance and balance risk exposure.

Telia Company does not accept criminal activities or fraud. Appropriate measures, including data preservation, shall be in place to enable detection and prompt response to security incidents and fraud.

All Telia Company employees and line managers are obligated to report security incidents and fraud according to established routines.

Telia Company must ensure that critical business functions will be available to customers and other stakeholders. Business continuity plans must be in place for all business critical services to maintain service resilience and recoverability according to business, legal and regulatory demands.

To ensure Telia Company's ability to handle unpredictable events, a crisis management organization and corresponding plans must be in place at Group level and Countries.

Security audits (follow-ups) shall continuously be conducted to ensure implementation of corrective actions and compliance to group policies, instructions and legal/regulatory demands.

Non-compliance of the Group Security Policy shall be reported to the Chief Security Officer.

These principles apply to the extent that they do not place Telia Company in violation of domestic laws and regulations.

ROLES AND RESPONSIBILITIES

Each Executive Vice President, Senior Vice President and Vice President reporting to the CEO of Telia Company is responsible for ensuring that this Group Policy is duly communicated and implemented, and that the employees within his/her area of responsibility are familiar with and follow this Group Policy.

All Telia Company employees are however individually responsible for reading, understanding and following this Group Policy. Each employee is also obliged to speak up and raise concerns about actual or possible violations of this Group Policy.

Violations of this Policy can lead to disciplinary action up to and including termination.

EXEMPTIONS

If any Telia Company Subsidiary would like to adopt a corresponding Group Policy with exemptions from this Group Policy, such exemption(s) must be approved by the board of Telia Company AB.

