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T 16923-11 UEN

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Owner
Peter Borsos
Head of Group Communications

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GROUP POLICY - COMMUNICATION

BACKGROUND AND DESCRIPTION

Background

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

Description

The principles stated in this Group Policy cover external and internal communication to make sure it is performed in a coordinated, efficient and professional manner.

SCOPE AND PURPOSE

Scope

This Group Policy applies to Telia Company AB and its Subsidiaries as their own binding policy. In addition, Telia Company strives to adopt 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 will be Group Instructions and Group Guidelines connected to this Group Policy.

Purpose

The purpose of this Group Policy is to inform how communication shall be done in Telia Company and that it is accurate and provided in a professional and timely manner.

This Group Policy covers all forms of oral and written communication. It applies to all Telia Company employees.

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PRINCIPLES

General communication principles

Telia Company's communication should be proactive, transparent, straightforward, relevant and service-minded towards all stakeholders, i.e. customers, employees, suppliers and partners, the public, media and the financial markets. All communication should reflect Telia Company's shared values and create a strong, unified brand image.

All information should be provided in accordance with the laws, as well as the rules and established practices governing companies listed on the stock exchange.

An employee of Telia Company should be aware that all types of communication influence the perception and image of Telia Company and therefore also the future development of the company.

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

External communication

- Media Relations
 - o Media Relations on behalf of the company are coordinated by the Head of Group Communications or by persons specifically appointed by the CEO or Head of Group Communications. Corporate messages to media shall be coordinated in order to make sure they are in line with the company's overall strategy and message planning.
- Investor Relations
 - o Share price sensitive or in other ways sensitive information may only be disclosed to the public, financial markets and media by the CEO, CFO, the Head of Group Communications, Head of Investor Relations or others with expressed authority from the persons mentioned above.
 - o Share price sensitive information may include financial and other forecasts; changes to the company's strategy; major investment decisions; acquisitions and divestitures; restructuring initiatives; the effect of regulatory changes; volume or sales related information; changes in Group Management; major customer contracts etc.

Internal communication

- Internal communication aims at strengthening the motivation, commitment, loyalty and responsibility among the employees. Communication is a strategic management tool and leadership responsibility. Managers are responsible for keeping an open dialogue with their own employees and with other parts of the company.
- Telia Company employees are responsible for keeping themselves informed about issues relevant to their work.
- All internal communication to a wider group of employees shall be considered to be public and therefore handled with care. Internal information which may be share price sensitive or in other ways sensitive should always be planned and approved by the Head of Group Communications or IR (see Investor Relations).



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These principles apply as long as they do not violate 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 making sure this Group Policy is 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 when it applies to their area of work responsibility. Each employee is also obliged to speak up and raise concerns about actual or possible violations of this Group Policy.

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.

