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Owner
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Page
1 (4)
Version
3.0 Approved

GROUP POLICY - ANTI-BRIBERY AND CORRUPTION

1 BACKGROUND AND DESCRIPTION

1.1 Background

This Group Policy relates to Anti-Bribery and Corruption and is a binding document for Telia Company AB, its Subsidiaries and its Joint Operations (“Telia Company”).

1.2 Description

Telia Company is committed to the highest norms of business conduct. We act in a responsible way, based on our Group Code of Ethics and Conduct. We advocate free and fair trade, striving for open and fair competition and ethical conditions within the legal frameworks of the countries where we operate.

2 SCOPE AND PURPOSE

2.1 Scope

This Group Policy applies to Telia Company AB and for its Subsidiaries and Joint Operations¹ as their own binding policy and applies to all employees and directors. 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.

¹ Once formally adopted by the local board of directors if required

Policy Public

Identifier
T 5086-13 UEN
Relation
50086201

Page
2 (4)
Version
3.0 Approved

2.2 Purpose

The purpose of this Group Policy is to set common standards for all Telia Company business regarding compliance with our zero tolerance policy towards any form of bribery and corruption, and in compliance with local laws of the countries where Telia Company operates.

3 PRINCIPLES

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

- Telia Company has a clear statement against bribery and corruption, and does not accept bribery or corruption in any form.
 - o Corruption is the abuse of an entrusted power for private gain.
 - o Bribery is the offering, providing, authorising, requesting, accepting or receiving of a financial or other advantage in order to encourage improper performance or to misuse a person's position. A bribe can be anything of value and does not necessarily involve money.
- At Telia Company we do not offer, authorise or pay bribes or anything of value to obtain or retain business, or to encourage or reward a decision.
- No employee of Telia Company shall offer, provide, authorise, request, accept or receive a bribe either directly or indirectly, including through any third party. It is prohibited to contribute financial means to any third party in a way that could constitute negligent financing of corruption.
 - o It is important to make sure that money paid to third parties, for example to agents, partners, vendors and consultants, is not used for corruption. "Red flags" are investigated, and necessary precautions and actions taken to eliminate or mitigate the risk for bribery and corruption in relation to third parties. Red flags are outlined in the Group Guideline on Third Party Due Care
 - o All procurement activities at Telia Company are performed in compliance with the Group Procurement policy, which clearly states the basic principles for a fair selection of suppliers and segregation of duties.
 - o The Supplier Code of Conduct includes a strict prohibition for all forms of corruption, including but not limited to extortion, bribery, facilitation payments, nepotism, fraud and money laundering.
 - o Employees who are at greatest risk of ending up in situations involving foreign government officials – especially those in supply chain, international sales, contracting or procurement – are trained in avoiding, preventing, spotting and reporting bribery and corruption.
 - o Mergers and acquisitions are conducted according to the Telia Company M&A Handbook, which stipulates principles for practicing due care and performing anti-corruption due diligence procedures.



Policy Public

	Page	
	3 (4)	
Identifier	Version	
T 5086-13 UEN	3.0	Approved
Relation		
50086201		

- At Telia Company we avoid an interest or situation that conflicts, or may appear to conflict, with our professional duty.
 - o A conflict of interest occurs when financial or other personal considerations may – or may appear to – affect an employee’s loyalties, professional judgement, and performance of duty.
 - o Telia Company employees are expected to always act in Telia Company’s best interest and to exercise sound judgement, unaffected by private interests or divided loyalties.
- All employees are prohibited from making or accepting facilitation payments, i.e. payments made to government officials to encourage or ensure that routine procedures are carried out or speeded up.
- Gifts, business hospitality or travel are only offered or accepted within the limits of local legislation and the Telia Company instructions and other guidance relating to this Policy. We do not offer or accept gifts, travel, payment or hospitality to encourage or reward a decision.
 - o Telia Company employees can only accept business hospitality and gifts proposals if they are open, reasonable, demonstrate a clear business objective, are appropriate for the nature of the business relationship and are accurately recorded.
 - o Telia Company does not allow gifts, apart from branded items of minimal value, to public officials.
 - o For further instructions on gifts, hospitality, travel and public officials, see the Group Instruction on Anti-Bribery and Corruption.
- We do not permit charitable or political donations or sponsorships as a way of concealing a bribe. It is never acceptable to make donations to political parties. Telia Company has a Group Sponsorships and Donations Instruction which clarifies our approach towards corporate giving, including specification of planning and approval process as well as follow-up.
- We keep accurate and transparent financial books and records. This includes the requirement that gifts and hospitality as well as sponsorships and donations are recorded to reflect the nature and purpose of the activity. We also require and keep records of the needed approval documents and verification of third parties
- Further practical guidance is outlined in the Group Guidelines on Anti-Bribery and Corruption.

3.1 Speak-Up and Reporting Issues

- Any Telia Company employee who suspects violations of the Code of Ethics and Conduct or this Policy should speak up and raise the issue to their line manager, to the Ethics and Compliance Office, or through the Speak-Up Line. The Speak-Up Line is also available for concerns raised from external parties. The Speak-Up Line is available on Telia Company internal and external webpages.



Policy Public

	Page	
	4 (4)	
Identifier	Version	
T 5086-13 UEN	3.0	Approved
Relation		
50086201		

- Speaking up is encouraged when an employee, in good faith, believes they have observed or are aware of a potential violation of the Code of Ethics and Conduct, this Policy or the law. When an employee does speak up, Telia Company expressly forbids any form of retaliation. Any action or behaviour that could be seen as a violation of this Policy must be promptly and appropriately handled, either by being corrected or reported for further handling. For specific requirements, please see our Group Instruction on Internal Reporting and Non-Retaliation

These principles apply as long as they do not place Telia Company in violation of domestic laws and regulations.

4 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.

5 EXEMPTIONS

If any Telia Company Subsidiary or Joint Operation 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.

For further information, refer to the Group Instruction – Anti-Bribery and Corruption, Group Instruction – Internal Reporting and Non-Retaliation, Group Instruction – Internal Investigations, Group Instruction – Interaction with authorities, administrations and other governing bodies and Group Instruction – Sponsorships and Donations.

