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# BUSINESS PARTNER CODE OF CONDUCT

## ENSURING ETHICAL BUSINESS CONDUCT AT THE HIGHEST STANDARDS

Tele2 is committed to conducting its business at the highest ethical levels. We have adopted this Business Partner Code of Conduct (hereinafter “the Code”) to ensure all Business Partners are aware of what is expected from them.

Tele2 requires all Business Partners to:

- Read and understand the Code;
- Sign a written or digital acknowledgement that they have done so; and
- Ensure that both the content and the spirit of the Code are fully implemented and consistently upheld throughout the duration of any business relationship with Tele2.

## Information Classification: PUBLIC

Version Table

Revision	Date	Prepared and approved by	Information
1 (v.1.1)	2018-11	Prepared by Marc Peeters, Head of Compliance Approved by Anders Nilsson, CEO	-
2 (v.1.2)	2021-06	Prepared by Jakob von Döbeln, Head of procurement Approved by Kjell Morten Johnsen, CEO	Updates to reflect a higher level of ambition and references to added policies
3 (v.1.3)	2024-12	Prepared by Maarten Uyttendaele, Head of Procurement and Erik Wottrich, Head of Sustainability Approved by Jean-Marc Harion, CEO, and the Board of Directors	Updates to structure to simply overview of included topics into 4 categories. Updates to reflect a higher level of ambition and references to added policies
4 (v.1.4)	2025-05	Prepared by Maarten Uyttendaele, Head of Procurement and Erik Wottrich, Head of Sustainability Approved by Jean-Marc Harion, CEO, and the Board of Directors	Minor updates to clarify labour rights commitments and climate-risk related requirements.

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# 1. Introduction

At Tele2, we believe that the success of the company depends on the success of the societies in which it operates. Sustainable growth in society and sound business practices go hand in hand. Tele2's ambition is that sound business practices shall prevail throughout our operations and daily business. To maintain a sustainable business model and help build a better society, we have to take responsibility for the impact our operations have on the world around us. Business Partners are an important part of our operations, and therefore we require them to join us in our efforts.

This Business Partner Code of Conduct is based on the Tele2 Code of Conduct that applies equally to Tele2, its employees, Leadership Team and Board of Directors. This document refers to principles Tele2 aims to adhere to. The guidance provided shall apply in an equal manner to Business Partners, unless the context clearly determines otherwise. All Business Partners are required to comply to this Business Partner Code of Conduct, and breaches hereof may result in Tele2 terminating all agreements with such Business Partners.

## 1.1 Basis of the Code

This Code refers to principles Tele2 aims to adhere to, and reflects Tele2's commitment to international guidelines, including:

- The UN Global Compact;
- The OECD Guidelines for Multinational Enterprises;
- The UN Guiding Principles on Business and Human Rights;
- The UN Universal Declaration of Human Rights;
- The Core Conventions of the International Labor Organization (ILO);
- The Children's Rights and Business Principles;
- The 1.5°C Ambition of the Paris Agreement;
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.

## 1.2 Scope of the Code

It is important that goods and services handled by Tele2 are produced and provided in an ethical way and ensure legal compliance, environmental and social considerations. Therefore, Tele2 expects this Code to be applied and upheld in the organisation of all its Business Partners (meaning its: affiliates, suppliers, sub-suppliers and vendors to Tele2), regardless of whether they deliver services or goods. The Code applies to all the Business Partners managers, employees and workers, whether permanent or temporary, apprentices or contracted through an employment agency.

Whenever "shall" is used, it indicates a minimum requirement that is necessary to be fulfilled. Whenever "should" is used, it indicates requirements which are recommended to follow and the targets that we encourage all Business Partners to work towards.

## 1.3 Related documents

This Code describes Tele2's requirements for Business Partners on an aggregated level. Tele2's commitments should be adhered to by Business Partners in relevant areas of sustainability which are further described in the following policies available at [www.tele2.com](http://www.tele2.com):

- Tele2 Code of Conduct
- Tele2 Whistleblowing Policy
- Tele2 Environmental Policy
- Tele2 Human Rights Policy
- Tele2 Anti-Corruption Policy
- Tele2 Conflict Minerals Policy
- Tele2 Fair Competition Standards

## 2. Requirements

Tele2 is committed to conducting its business at the highest ethical levels. Tele2 sets requirements on its Business Partners to ensure legal compliance, environmental and social considerations and ethical conduct throughout its value chain.

### 2.1 General

Tele2 sets overarching requirements on its Business Partners to promote transparency, accountability and efficient management of the requirements of this Code.

#### 2.1.1 Compliance

Tele2 and its Business Partners shall comply with the laws of each country in which we operate. This Code sets ~~up~~ a minimum requirement. In all cases where local law is less strict than this Code, the requirements described in this document shall be adhered to. If provisions in other laws, be it local, national or international, have a more stringent position to sustainability matters included in this Code, those shall be observed and complied with. In situations where neither the law nor the Code gives guidance, the UN Global Compact principles shall prevail.

Business Partners shall verify compliance with regulatory requirements and this Code within its own operations and reflect the content of the Code in its agreements with its subcontractors. Any failure to comply with this Code, of which a Business Partner is aware, shall be immediately reported to Tele2. The failure to do so would be a breach of this Code.

#### 2.1.2 Due diligence

Business Partners shall conduct comprehensive due diligence covering human rights, environmental impacts, and anti-corruption measures within its operations and value chains. This includes identifying, preventing, mitigating, accounting, and remediating potential adverse impacts. The complexity of this due diligence shall align with the size of the business enterprise and the specific nature and context of its operations.

#### 2.1.3 Grievance mechanisms and remediation

Business Partners shall provide access to grievance mechanisms for its employees and other potentially affected stakeholders, where they can report on any concerns or complaints related to the contents of this Code, at a minimum. The available grievance mechanisms should make sure that reports can be submitted anonymously, that the information is treated confidentially and without fear of retaliation.

In case of a human rights violation, Business Partners shall promote access to remedy for any victims of human rights abuses connected to their operations. Where identified that Business Partners have caused or contributed to adverse impacts, they shall provide for, or cooperate 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. Business Partners shall do the same in their business relations.

#### 2.1.4 Management of sustainability topics

Business Partners shall establish and maintain adequate management systems based on continuous improvements, that identify and mitigate legal, environmental, occupational health and safety, labour practice, and ethical risks. These systems should align with internationally recognized standards (e.g., ISO 14001, ISO 37001, and ISO 45001) and relevant industry best practices, tailored to the Business Partner's size and nature.

These systems shall include:

1. A comprehensive risk assessment to identify and address material risks through adequate control measures, including procedures and instructions;
2. A publicly available policy outlining commitments and guiding principles;
3. Periodic self-evaluations and audits to ensure compliance with the management systems;
4. Corrective action process to address identified deficiencies promptly.

#### 2.1.5 Privacy and data protection

In the course of its operations, Tele2 has access to customer data for processing and storing. When handling data, Tele2 and its Business Partners shall take into account the Tele2 customers' rights to maintain personal integrity and privacy.

Tele2 should be trusted by customers and employees to handle their data, and can only achieve this in cooperation with its Business Partners. Business Partners shall comply with applicable laws and regulations on the freedom of speech, the right to privacy and personal integrity as well as on personal data retention. Business Partners shall

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endeavour to prevent any unauthorized access to personal information. Business Partners shall not process customers' personal data other than as allowed by applicable legislation.

### 2.1.6 Safety of products and services

Tele2 wins customers and builds long-term relationships by providing cost efficient and good quality services, and Tele2 expects the same from its Business Partners. This is done by demonstrating honesty and integrity in all interactions. Marketing, advertising, and communications shall be accurate, truthful and comply with mandatory laws.

Tele2 actively works to prevent fraud and abuse of its communications services. Business Partners shall take the necessary measures to ensure digital and physical product safety through e.g. product testing and ensure compliance with applicable safety and quality standards for the products and services provided to Tele2 (e.g. CE marking).

When in use, electric equipment emits radiation and creates electromagnetic fields (EMF). In handling EMF related to Tele2's networks, Tele2 and its Business Partners shall follow recommendations made by the relevant authorities.

### 2.1.7 Financial and sustainability reporting

Tele2 is required to follow strict accounting principles and standards (IFRS; CSRD), to report financial and non-financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting, financial reporting and sustainability reporting complies with legislation. This includes collecting sustainability data from its own organization and from Business Partners in the value chain. Business Partners must act in a way that supports Tele2's efforts in this area, including providing sustainability data necessary for reporting according to the EU's Corporate Sustainability Reporting Directive.

The integrity of Tele2's financial records is critical to the operation of Tele2's business and is a key factor in maintaining the confidence and trust of our shareholders. Tele2 must ensure that all transactions are properly recorded, classified and summarised in accordance with Tele2 accounting policies. Business Partners may not cause Tele2 employees to enter or remove information in the company's books or records that intentionally hides, misleads or disguises the true nature of any financial or non-financial transaction or result.

### 2.1.8 Security and confidentiality

Business Partners shall have adequate information, physical and cybersecurity measures in place, addressing the risks, threats and vulnerabilities posed to them. Business Partners shall also adhere to applicable information, physical and cybersecurity regulatory requirements and legislation, and follow established industry best practices.

Business Partners shall ensure that sensitive data (e.g. trade secrets) is properly and lawfully collected, processed, saved and deleted. Sensitive data must not be transmitted to a third party or made available in any other form without the necessary authorisation and must be protected in this respect.

### 2.1.9 Artificial intelligence

Data privacy and security are crucial requirements for the use of Artificial Intelligence (AI). Business Partners shall ensure that all development and/or delivery of products or services to Tele2 using AI is reliable, without discrimination and subject to applicable laws and regulations. The control of AI applications shall always remain with human beings.

Business Partners shall use responsible and ethical AI practices. This shall ensure fairness, and includes respect for human rights, diversity, and equality, as well as accountability, transparency, safety and security.

## 2.2 Environmental

Businesses have a responsibility to protect the planet for future generations. Tele2 and its Business Partners should work to improve the environmental performance of their products and services as well as reducing natural resource usage. Business Partners shall have thorough knowledge of their own environmental challenges and should always strive to choose alternatives with less environmental impact.

Business Partners shall apply a precautionary approach towards environmental and climate matters, and to protect biodiversity and ecosystems. In practice this means that Business Partners shall choose products and solutions with low environmental footprint in the context of their commercial relationship with Tele2. Business Partners running operations with high environmental impact, e.g., production facilities and construction of network infrastructure, shall undertake initiatives to promote greater environmental responsibility and encourage the development of environmentally friendly technologies. These requirements are aligned with principles 7, 8 and 9 of the UN Global Compact.

### 2.2.1 Environmental management

Environmental impact should be assessed and managed across the entire lifecycle of products and company operations. Efforts to reduce and optimise the consumption of energy, water and materials shall be promoted.

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Business Partners shall have an Environmental Management System in place to ensure a systematic way of working with environmental issues.

### 2.2.2 Climate action

Business Partners shall set science-based targets and should have targets validated by the Science Based Targets initiative. The targets should be aimed at limiting global warming to 1.5°C, as outlined in the Paris Agreement. Business Partners shall have a time-bound plan in place to mitigate and reduce their greenhouse gas footprint. This plan should address emissions across all relevant Scope 1, Scope 2, and Scope 3 categories. The plan shall include continuous improvement measures, with Business Partners actively working towards absolute reductions in emissions. Business Partners shall have an action plan for the transition towards renewable energy sources. Energy consumption shall be responsibly managed, prioritizing renewable energy sources in own operations and across the value chain.

Business Partners are required to report Scope 1, 2, and 3 GHG emissions annually, following recognised standards such as the Greenhouse Gas Protocol.

Business Partners shall assess and manage climate-related risks and take appropriate measures to ensure operational resilience.

### 2.2.3 Pollution and chemicals

Pollutant emissions and discharges should be minimised or eliminated at the source through measures such as installing pollution control equipment, altering production, maintenance, and facility processes, or other methods. According to the polluter pays principle, those responsible for pollution must cover the costs associated with managing and mitigating the environmental impact of their actions.

Substances, waste, and other materials that could be harmful to humans or the environment shall be identified, labelled, and managed to ensure their safe handling, transport, storage, use, recycling or reuse, and disposal.

Business Partners should 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)<sup>1</sup> present in products delivered to Tele2, in accordance with the REACH (EC1907/2006) regulation. Electric and electronic products delivered to Tele2 must not contain any of the following substances: lead, mercury, cadmium, hexavalent chromium, PBBs, PBDEs, DEHP, BBP, DBP or DIBP, in accordance with the Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS) directive.

### 2.2.4 Waste, water and natural resources

In order to minimise waste generation, Business Partners shall strive to reduce, reuse and recycle materials and products, in that priority order through measures such as altering production, maintenance, and facility processes, or other methods. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, should be conserved by modifying production, maintenance, and facility processes, substituting materials, reusing, conserving, recycling, or other means. Hazardous waste and effluents shall be handled appropriately, and data on hazardous waste shall be tracked and documented in line with legal requirements.

Business Partners should use water resources sustainably by measuring and reducing water consumption where possible. This means taking measures to protect marine ecosystems from pollution and damage, including minimising the discharge of harmful substances into water. All chemicals and materials that could pose a risk to the aquatic environment shall be handled safely to prevent contamination.

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<sup>1</sup> <https://echa.europa.eu/candidate-list-table>

## 2.3 Social

Tele2 and its Business Partners shall respect human rights and to remediate if they cause or contribute to violations of human rights. This includes principles 1–6 of the UN Global Compact which outlines that businesses should support human rights, ensure they do not cause human rights abuses, uphold freedom of association and the right to collective bargaining, eliminate all forms of forced and compulsory labour, abolish child labour, and eliminate employment discrimination. These commitments are also aligned with the UN Universal Declaration of Human Rights, and the International Labour Organisation's (ILO) 8 core conventions.<sup>2</sup>

### 2.3.1 Human rights

All employees of Tele2 and its Business Partners are entitled to fundamental human rights which shall be known, understood and respected and be applied equally. No one shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. Forced, exploited or bonded labour or trafficking of persons is strictly forbidden, based on the meaning of ILO 29 Forced Labour Convention and ILO 105 Abolition of Forced Labour Convention. Employees shall not be required to lodge deposits or original identity papers as a condition for employment.

Business Partners shall promote diversity, equity and inclusion for all employees, and strive to increase diversity (for instance of gender, age, ethnicity). All employees of Tele2 and its Business Partners are protected by the fundamental right not to be discriminated against. They shall not be subject to discrimination, whether active or by means of passive support, whether based on ethnicity, national origin, religion, disability, gender, sexual orientation, gender identity or expression, marital or parental status, union membership, political affiliation or age.

The Business Partner shall work proactively to ensure that minerals (such as but not limited to tungsten, tantalum, tin, gold, and cobalt) in its products and its supply chain are responsibly sourced. When applicable, the Business Partner shall have a policy and due diligence process in place, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas<sup>3</sup>. Tele2's commitments regarding conflict minerals are specified in Tele2's Conflict Minerals Policy.

Business Partners shall not tolerate or engage in any threats, intimidation, physical or legal attacks against human rights defenders, including, but not limited to, trade unionists and environmental defenders.

### 2.3.2 Labour rights

Labour rights are human rights at work and as a responsible and sustainable company, Tele2 sets high standards in this area and expects its Business Partners to do the same.

The rights of employees to freely associate and to bargain collectively, in accordance with the laws of the countries in which they are employed, shall be recognised and respected.

Employees shall not be forced to work more than the limits on regular and overtime hours allowed by the laws of the country in which they are employed. Overtime shall be compensated at no less than the legally required rate. All employees shall have contracts specifying the terms of employment.

Workers of Tele2's Business Partners shall be paid wages and benefits that meet at least the minimum total wage required by applicable national law, and be sufficient to provide a decent living and meet basic needs of workers and their families. All employees shall have the right to equal pay for equal work, as well as periodic holiday with pay.

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<sup>2</sup> 1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)

2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)

3. Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol )

4. Abolition of Forced Labour Convention, 1957 (No. 105)

5. Minimum Age Convention, 1973 (No. 138)

6. Worst Forms of Child Labour Convention, 1999 (No. 182)

7. Equal Remuneration Convention, 1951 (No. 100)

8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

<sup>3</sup> <https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas>



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### 2.3.3 Occupational health and safety

Safety at work is a prioritised concern of Tele2's and therefore we take adequate steps to prevent accidents and injury to health, by minimising the causes of hazards inherent in the working environment and by providing appropriate safety equipment. The same is expected from Business Partners.

Business Partners shall have systems to report and procedures to investigate and take action with regard to all accidents, near-accidents and unsafe situations. Managers and employees shall have knowledge about accidents and near-accidents, understand the importance of preventive work and corrective actions and practice it in their daily work.

Business Partners shall provide workers with appropriate workplace health and safety information and training. Training shall be provided to all workers prior to the beginning of work and regularly thereafter.

### 2.3.4 Child rights

Tele2 is strongly committed to respecting the rights of children in our own operations and value chain. Tele2 requires that its Business Partners shall comply with relevant international child rights principles, including the United Nations Convention on the Rights of the Child and the Children's Rights and Business Principles.

Business Partners shall support children's rights in its business activities and business relationships, and work to protect children online where appropriate. This can be done by strengthening children's online skills and forbidding employees from possessing, or searching for, materials documenting sexual abuse of children. It can also include measures to ensure the safe use of products and services for children and young people.

To help support parents, caregivers and children throughout the value chain, Business Partners shall implement family-friendly policies in the workplace and promote employment conditions and benefits that help to improve the living conditions of children and their families, such as paid parental leave and childcare services.

### 2.3.5 Child labour and young workers

Children under the minimum working age established by local law or fifteen (15) years, whichever is greater, shall not be used as part of the labour force. Employees under eighteen (18) years shall not be engaged in hazardous or heavy work, or on night shifts. Business Partners shall implement appropriate procedures to mitigate risk for child labour, such as age verification mechanisms. Business Partners shall implement child labour policies and commit to provide assistance and/or remediation in case child labour is identified in their operations or value chain.

## 2.4 Business Ethics

To ensure the efficient use of resources, Tele2 and its Business Partners shall uphold principles of business ethics throughout the value chain. Tele2 strongly believes in transparent and consistent corporate governance practices and abides with the applicable regulations and standards in each of its geographical markets. This protects the legitimate interests of all Tele2's shareholders and stakeholders, and Tele2 expects its Business Partners to act in support of these efforts.

### 2.4.1 Anti-corruption

Business Partners shall abide by Principle 10 of the UN Global Compact, which states that businesses should work against corruption in all its forms, including extortion and bribery.

Tele2 employees and members of the Board of Directors may not offer, ask, give or accept, directly or indirectly, any undue advantage for personal gain to or from any third party, unless it can be constituted as being within the boundaries of accepted business practices such as representation and reasonable hospitality given in the ordinary course of business. Business Partners shall adhere to the same standards in relation to the work they do for Tele2.

In most countries, gifts or benefits to government employees or public officials are considered a violation of law. Business Partners must not offer money or any gift, at their own initiative or on behalf of Tele2, to an official or employee of a governmental entity, except for symbolic gifts of insignificant monetary value, provided this is allowed by law.

### 2.4.2 Fair competition

Tele2 is firmly committed to fair competition and open markets. One of the foundations for our success has been the break-up of monopoly power. We remain firm believers that free and fair competition works in our favour allowing Tele2 to provide expected quality and cost-efficient communication services to our customers. Accordingly, Tele2 and its Business Partners are expected to comply with competition laws and for example not engage in collusive practices or monopoly foreclosures.

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### 2.4.3 Conflict of interest

When business decisions are made by Business Partners, conflict of interest should be avoided, so that decisions are always in the best interest of Tele2 and its Business Partners. Personal relations or considerations may never cause to influence Business Partners' decision making. This includes not only potential gains given to Business Partner employees, but also to relatives and friends of Business Partner employees. Business Partners are expected to identify any possible conflict of interest in their (prospective) relationship with Tele2 and inform Tele2 of such conflicts.

Business Partners need to be aware that, to avoid risk of conflict of interest, the following applies to Tele2 employees:

- Employees may not, without the company's written consent, work outside Tele2 in any capacity (e.g. employment, consultancy, Board membership) if the other employment or assignment competes with Tele2's activities. Additional local rules for work outside Tele2 may also apply.
- If there is any risk, however small, for conflict of interest, employees are expected to immediately inform their manager.

### 2.4.4 Trade sanctions

Tele2 is committed to complying with all sanctions applicable to our business activities and have a zero-tolerance for undertaking any business or transaction that would breach applicable sanctions regimes. Business Partners shall acknowledge the importance of complying with sanctions regimes. Business Partners shall not violate any laws, statutes, and regulations relating to trade sanctions applicable to the Business Partner's operations and will maintain policies and procedures reasonably designed to ensure compliance with such applicable laws throughout its supply chain. Business Partner shall take reasonable steps to ensure that any person acting on their behalf complies with such policies and procedures and will promptly notify Tele2 should they become aware of any risk of sanction violations.

### 2.4.5 Procurement decisions

We recognize that our relationships with Business Partners are integral to our mutual success. Selection processes and procurement decisions must be conducted objectively and transparently, ensuring they align with our shared goals and priorities. These decisions are driven by a thorough evaluation of costs, the ability to meet requirements, expected delivery capabilities, quality standards, and other relevant factors that contribute to a fair and sustainable business relationship.

We uphold the principle that all business decisions should remain free from any undue influence by third parties. Any Business Partner found to have attempted to exert inappropriate influence over procurement decisions will be excluded from future collaborations.

We encourage fostering a diverse and inclusive network of Business Partners by actively seeking opportunities to engage with businesses that are managed or owned by underrepresented groups, including minorities and women. This approach not only reflects our values but also strengthens the resilience and diversity of our business ecosystem.

### 2.4.6 Intellectual property rights

Intellectual property rights shall be respected. The transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and Business Partner information shall be safeguarded.

## 3. Governance

### 3.1 Authority

This Code has the authority of the Tele2 AB Board of Directors and the Leadership Team.

### 3.2 Reporting violations

It is the responsibility of Business Partners to make sure that both the content and the spirit of this Code are communicated, understood and acted upon within their organisations and to encourage employees to reveal behaviour that may be non-compliant with the Code. Explicit or implicit approval of questionable actions will not be tolerated.

If and when any person is informed of, or suspects, any activities, taking place at Tele2 or at a Business Partner, that may be in violation of this Code, it is this person's responsibility to report it.

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In order to report via the Whistle Blower channel, please use one of the following alternatives:

- E-mail to [report.violation@tele2.com](mailto:report.violation@tele2.com) which is directed to the Chairperson of the Tele2 Audit Committee and the Tele2 Whistle Blower Function
- Send a letter to the address “*Tele2 Whistleblower, EVP Corporate Affairs, Torshamnsgatan 17, SE-164 40 Kista, Sweden*”. The letter will be forwarded to the Chairperson of the Tele2 Audit Committee
- Use the direct telephone contact at +46 701 620 062, where your call will be answered by the Tele2 Whistle Blower Function.
- As an alternative to the above, for matters related to **Estonia** you can also contact Head of Legal and Business Security Taivo Kendla via email to [taivo.kendla@tele2.com](mailto:taivo.kendla@tele2.com) or phone at +37 2501 6021. For matters related to **Latvia** you can also contact Security Manager Aleksandrs Bogdanovs via email to [aleksandrs.bogdanovs@tele2.com](mailto:aleksandrs.bogdanovs@tele2.com) or phone at + 37 128 373 827. For matters related to **Lithuania** you can also contact Legal & Regulatory Department Manager Edvinas Krasauskas via email to [edvinas.krasauskas@tele2.com](mailto:edvinas.krasauskas@tele2.com) or phone at +37066800417

Anonymous reports will be accepted but contact details to the reporting person are appreciated. If you do *not* want to receive feedback on your report, please clarify this when making the report.

More information about Tele2's Whistleblower procedures can be found in Tele2's Whistleblowing Policy.

### 3.3 Termination

Tele2 considers compliance with the requirements set out in this Code to be essential to its contractual relationships. Tele2 reserves the right to terminate all agreements for cause with immediate effect if the Business Partner does not comply with these requirements and is unwilling to take the necessary actions to remediate non-conformances.