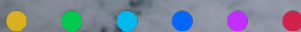


A photograph of a man and a young child sitting on the floor, looking at a smartphone together. The man is on the right, wearing a blue long-sleeved shirt, and the child is on the left, wearing a red shirt. They are in a room with a window in the background, through which a potted plant with white flowers is visible. The lighting is soft and natural, suggesting an indoor setting near a window. The overall mood is calm and focused.

# Tele2 Child Rights Impact Assessment

July 2024

**TELE2**



## Foreword

Tele2 serves millions of families and households with connectivity, including children and young people. Children are also one of the most vulnerable users of online services and we therefore have to take extra care to ensure that our products and services are safe to use – not only for our adult customers but for all members of the family.

Child protection has been a priority for Tele2 for many years and is one of the four pillars of Tele2's sustainability strategy. Life online is in many ways a reflection of society, but compared to the physical world it offers far less protection from harm such as disinformation, cyber-bullying, fraud, or sexual abuse. Living in a connected society also presents children with many great opportunities to learn, to play, to make new friends, and keep in touch with them, and we are proud to give children access to all of the great things online.

Tele2 has a long-standing history of leadership and a strong commitment to protecting children online, and we go to great lengths to ensure that we stand by this commitment. Offering browsing protection and providing guidance to our customers help children and adults to navigate online life more safely, and our use of innovative technology accelerates our leading efforts to prevent the distribution of child sexual abuse material.

To continue to put children's perspectives on the agenda we have assessed Tele2's impact on children through our direct operations and value chain, and present the results in this report. While the assessment shows that we have come a long way, it also identifies key areas where we can focus our efforts to continue to create a positive impact on children. The results of the assessment will provide valuable insights into our actions and business decisions going forward and ensure that we stay true to our commitment for children's rights.

Johan Gustafsson,

Executive Vice President Communications & Sustainability

## Introduction

This report presents the findings and results from of a Child Rights Impact Assessment (CRIA) that Tele2 conducted in 2023. The purpose of the CRIA was to identify actual and potential negative impact on child rights that Tele2 may be involved in through our business operations, partnerships, and across our value chain, to ensure that we are taking sufficient action to mitigate any negative impact and help support children's rights. Child rights was identified as one of Tele2's most salient risks in our most recent human rights impact assessment, and the CRIA therefore supports the development and implementation of Tele2's human rights due diligence process with a particular focus on children.

Tele2's operations are governed by the ethical standards depicted in Tele2's Code of Conduct. It is based on the 10 guiding principles of UN Global Compact and includes Tele2's commitment to safeguarding human rights, including child rights. Business partners are expected to adhere to the same standards in relation to the work they do for Tele2, which is governed by the Business Partner Code of Conduct that Tele2 requires suppliers to sign. Tele2 also follows the Children's Rights and Business Principles outlined by UNICEF to guide companies in their commitments and actions for promoting children's rights.

## Methodology

The CRIA has been based on the UNICEF MO-CRIA: Child Rights Impact Self-Assessment Tool for Mobile Operators – a tool design to offer a comprehensive framework for use by mobile operators to understand the challenges, opportunities, and child rights impacts related to their industry and operations. Based on the UNICEF MO-CRIA, Tele2's operations have been evaluated on the following set categories: 1) CSR & Compliance, 2) Children & the Digital Environment, 3) Human Resources, 4) Products, sales & Marketing, 5) Procurement, 6) Network operations, 7) Security.

The assessment was based on a comprehensive assessment of Tele2's current policies, processes, and operations related to children's rights, benchmarking against industry peers, desktop research and industry analysis on children's rights and the ICT-sector, and stakeholder dialogues with internal and external stakeholders including key company functions at Tele2 and external child rights organisations.



# Identified child rights impact areas

Based on the MO-CRIA, benchmark, industry analysis and stakeholder dialogues, five main child rights impact areas for Tele2 have been identified which are described below.

## Child online safety and digital inclusion

Through the services provided by Tele2's and other telcos, there is a potential impact on children, such as the risk of children falling victim to abuse, fraud, or other forms of harassment through their online interactions. Children may also encounter harmful content or fall victim to sexual abuse enabled through the provided services. There is also potential negative impact from children suffering of poor mental or physical health from overusing digital medias. Implementing measures to safeguard children online is therefore a priority to provide services safe for children. All children have the right to freedom of expression and right to information. With an increasingly digital society, the digital environment is an important arena for exercising your rights. Equal access to connectivity is critical to uphold these rights and ensuring that all children can use connected services safely.

### Tele2's current activities

Protecting children in the online environment is a prioritised area for Tele2 as well for Tele2's stakeholders. Online child protection is one of the four focus areas of Tele2's sustainability strategy, and Tele2 sets up annual activities and goals to ensure continuous progress in promoting children's rights when using connected services. Tele2's commitment to protect children online involves activities beyond our direct services, for example by guiding adults in their support for children's safety across various online platforms.

Tele2 actively blocks attempts to access child sexual abuse material (CSAM) in Tele2's network in the markets of its operation, in Sweden and the Baltics. Tele2 has implemented blocking lists provided by the Swedish Police and Interpol, and since 2022 Tele2 has added an additional list from Project Arachnid<sup>1</sup>. Project Arachnid is a blocking tool developed by the Canadian Centre for Child Protection that uses innovative technology to detect potential CSAM, analyse and identify CSAM in collaboration with a selection of international hotlines, e.g. ECPAT Sweden, and send out take down notices to the server providers hosting this content. In 2023, Tele2 blocked 5.1 million attempts to access CSAM in its network. Currently, Tele2 is the only telco in Sweden that has implemented Project Arachnid in its networks. To continue to advance the efforts to prevent the spread of CSAM Tele2 is an active member and one of the co-founders of ECPAT Sweden's Tech coalition. The Tech coalition consists of telcos and tech companies with the purpose of increasing collaboration across the industry and share best practices. The common goal of the coalition is to fight sexual abuse and exploitation of children online.

Tele2 is also a partner to the Swedish Prince Carl Philip and Princess Sofia's Foundation. One of the foundation's areas of operation is to create a safer and more empathetic everyday online life for children and youth. It runs projects and initiatives to inform and create awareness of how parents and children can live safer lives online. Through this collaboration, Tele2 and the Foundation share knowledge and guidance to parents on online child protection through public events, customer communication and through a co-created parental site on the Foundation's educational platform Lajka<sup>2</sup>.

To help safeguard both adult and young users of Tele2's services, customers are offered technical safeguarding tools in all countries of operation: Trygg Surf (Sweden), Whalebone, Bitdefender and Plume (Estonia), Internet Security (Latvia), and Internet Protection (Lithuania).

Tele2 believes that gathering insights on children's online habits is important to ensure that its activities and initiatives are impactful. Tele2 gathers insights through close collaboration with partner organisations specialising in children's rights, such as ECPAT Sweden, the Prince Couple's Foundation and Reach for Change. Tele2 also gathers insights directly from children and teenagers by conducting own surveys on current topics. In 2021, Tele2 released the latest edition of the report 'Children and Teenagers online' with results from interviews with both children and parents on children and teenagers' online habits and experiences.

<sup>1</sup> <https://www.projectarachnid.ca/en/>

<sup>2</sup> <https://lajka.prinsparetsstiftelse.se/foraldrar/>

## Working conditions

The guidelines and processes that form Tele2's working conditions have an impact on the standard of living of Tele2's employees and their families, including children, including remuneration and benefits. Ensuring decent working conditions for parents and caregivers in all countries of operation is from this perspective tightly linked to children's standard of living and human rights.

### Tele2's current activities

Tele2 invests in the well-being and development of its employees. Attracting and retaining talented and diverse employees is essential for Tele2 to deliver on its strategy and sustain its culture. Tele2 recognises the importance of offering good working conditions to ensure the well-being of its employees and their families. For Tele2, this includes offering competitive salaries, flexible working hours, parental leave for mothers and fathers and options to leave with temporary parental allowance for the care of children, all compliant with or exceeding local legislation.

In Sweden, which represents around 80% of Tele2's operations, all Tele2 employees, apart from the Group Leadership Team, are covered by a collective bargaining agreement. For Tele2's other countries of operations, working conditions and terms of employment is determined according to local labour laws. Tele2 has a positive view on collective bargaining and supports the right of all employees to form trade unions and sign collective bargaining agreements. Tele2 operates in markets with high standards and good legal frameworks for working conditions, wages, and parental support.

## Suppliers and business relations

With more complex global supply chains, companies have a responsibility to promote respect for human rights of workers in the value chain – not the least to eliminate child labour and promote decent working conditions for parents and caregivers. Children are especially vulnerable stakeholders and affected by poor working conditions of their families.

### Tele2's current activities

In order to uphold the same standards in its entire value chain, Tele2 wants to ensure the same high level of awareness and engagement in human rights and child rights issues among its suppliers and business partners as in Tele2's direct operations.

Tele2 has adopted a framework for sustainable procurement based on the requirements of Tele2's Business Partner Code of Conduct. The Business Partner Code of Conduct is based on the 10 guiding principles of the United Nations Global Compact, and encompasses fundamental human rights including labour rights, child labour, anti-discrimination, etc. Tele2 requires its significant business partners to sign and comply with the Business Partner Code of Conduct and encourage business partners to spread the requirements and follow up on progress and compliance in their supply chain and to relevant parties. Through this process, Tele2 includes clauses about human rights and children's rights into a vast majority of its agreements with its business partners. Tele2 carries out annual risk assessments to identify potential negative human rights impact in Tele2's supply chain, including evaluation of risks based on the country and industry of suppliers, their score in EcoVadis' Business Sustainability Rating and their critical importance to Tele2's operations. Based on the risk assessment, several suppliers are selected for follow ups of their compliance with the Business Partner Code of Conduct through on-site audits. No cases of child labour have been identified in the on-site audits in the past years.

Tele2 strives to promote and ensure channels for transparent and open communication where all internal and external stakeholders can raise concerns without fear of retaliation or reprisal and provides fair investigation and grievance mechanisms. This process is described in Tele2's Whistleblowing policy<sup>3</sup>.

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<sup>3</sup> <https://www.tele2.com/sustainability/sustainability-governance/whistleblowing-policy/>

## Marketing and advertising

Children are especially susceptible to marketing and advertising and have not yet developed the critical thinking required to make an informed decision. At the same time, children are exposed to a lot of advertisements and media influences. Regardless of whether children are the desired target audience or not, they will be exposed to advertisements. It is therefore important to be aware of the potential impact of children from advertising and how to manage it in a responsible manner.

Marketing and advertising to children is regulatorily and ethically complex. These preconditions create a greater responsibility for companies in ensuring the respect for children's human rights through their marketing practices.

### **Tele2's current activities**

Marketing communications is a core aspect of Tele2's interaction with its customer base. While Tele2 does not direct advertising towards children, and people under the age of 18 are not able to purchase Tele2's services, we acknowledge that children still may access Tele2's marketing on television, in physical ads and on digital platforms. Tele2 therefore works actively to counteract negative stereotypes and behaviors when creating our advertising material. In addition to following applicable laws and regulations concerning marketing directed towards children, including local marketing laws and the International Chamber of Commerce's (ICC) regulations, Tele2 is committed to not targeting children inappropriately and respecting children's rights in its marketing and advertising.

Tele2 works actively with best practice in marketing as a member of the Swedish Data & Marketing Association, SWEDMA. Tele2 is also represented in the Swedish Advertising Ombudsman's opinion board that tries incoming cases of marketing potentially violating good business conduct and sets best practice.

Responsibility for marketing and sales lies with local teams as legislation, and the legal team reviews marketing material before it is published to assure compliance with applicable laws and voluntary regulations. If incidents occur, they are reported to the responsible management team. Any violations with legal or regulatory marketing or labelling requirements or voluntary codes of conduct, including child related violations, are publicly reported in Tele2's Annual and Sustainability Report. Ethical communication is also included in the Tele2 Code of Conduct.

## Product safety

While digital products and services are used at all ages, children are an especially vulnerable user group. There is potential impact on children both from the services that Tele2 provides and from the devices that are necessary for accessing our services, such as mobile phones, smart watches, etc. There is a potential risk of negative health and safety impact on children if Tele2 distributes defect products, e.g., mobile phones/chargers that become a fire hazard due to over-heating, chemical leakage from electronic devices (RoHS/REACH), etc.

### **Tele2's current activities**

Tele2 has procedures in place to ensure the health and safety of products and services that it provides to its customers. Tele2's business partner code of conduct stipulates requirements on safety of products and services, including integrity and privacy. 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 carries out privacy impact assessments and sets clear standards for privacy and the collection and storage of personal data. Tele2 complies with minimum ages and parental consent requirements as defined in the applicable law, GDPR. Any incidents of non-compliance with regulations and codes concerning the health and safety of products are reported in Tele2's Annual and Sustainability Report, including any information security and privacy incidents.

## Next steps

Apart from identifying Tele2's most material child rights impact areas, the assessment also showed areas of improvement to reduce the actual and potential negative impact on children through its operations, as well as areas where Tele2 has the leverage to further children's rights through its operations.

- Increased collaboration and consistency of initiatives across all markets
- Continued development of CSAM blocking to ensure all possibilities are exhausted
- Publicly communicate on family friendly policies
- Strengthen child perspective in evaluations of health and safety of products
- Integrate child rights perspective into supply chain management beyond child labour

Tele2 is committed to undertaking actions to ensure that concrete improvements in these areas take place in the coming year.

A man and a young child are sitting on a light-colored tiled floor, looking at a smartphone held by the man. The child is on the left, wearing a red t-shirt, and the man is on the right, wearing a blue long-sleeved shirt. In the background, there is a window with a potted plant on the sill. The word "TELE2" is overlaid in large white letters in the center of the image.

# TELE2



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