

# Tele2 Child Rights Impact Assessment

June 2025



**TELE2**



## Preface

Tele2 serves millions of families and households with connectivity, including children and young people. As some of the most vulnerable users of digital services, children require special attention to ensure that our products and services are safe and inclusive, not just for adults, but for every member of the family.

Child protection remains a cornerstone of Tele2's sustainability strategy and one of its key strategic pillars. The online world mirrors many aspects of society, yet it often lacks the safeguards found in the physical world, leaving children exposed to risks such as disinformation, cyberbullying, fraud, and sexual exploitation. At the same time, the digital space offers children incredible opportunities to learn, play, connect, and grow, and we are proud to help unlock those opportunities.

In 2024, we have reaffirmed our long-standing commitment to protecting children online. Through browsing protection, customer guidance, and the use of advanced technologies, we continue to lead efforts to prevent the spread of child sexual abuse material and support safer digital experiences for all.

To keep children's perspectives at the forefront, we have once again assessed Tele2's impact on children across our operations and value chain. This updated report presents the findings of that assessment. While we recognize the progress made, the results also highlight areas where we can further strengthen our efforts. These insights will guide our future actions and ensure that we remain steadfast in our commitment to children's rights.

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## Introduction

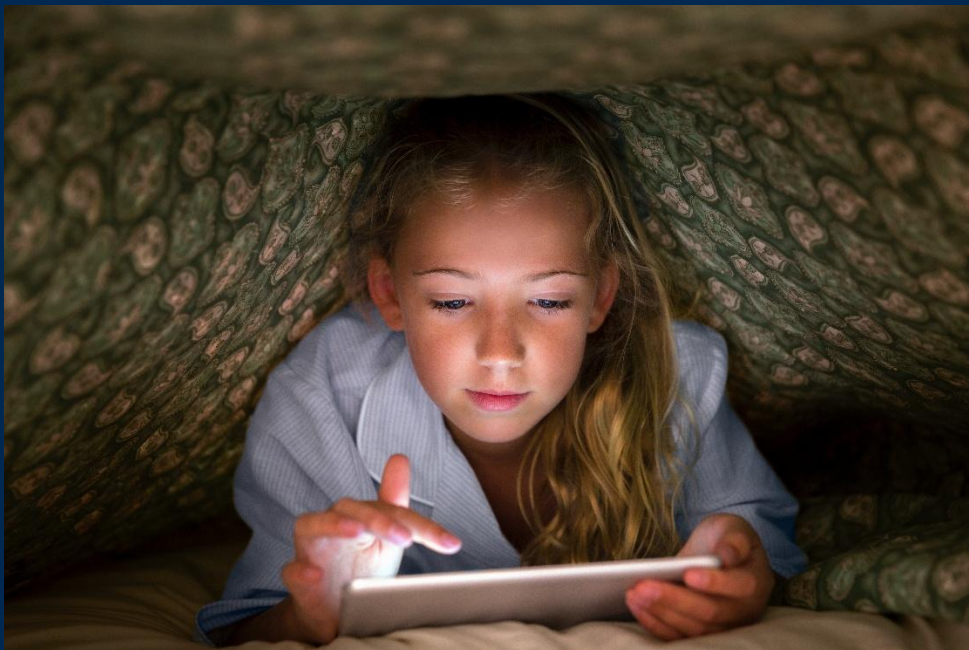
This report is a revised version of Tele2's first Child Rights Impact Assessment report published in 2024. The report presents the findings and results from of a Child Rights Impact Assessment (CRIA) that Tele2 conducted in 2023, as well as updates on Tele2's activities and progress in 2024. The purpose 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 Child Rights Impact Assessment is 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 , initially conducted in 2023, is 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. Results and findings of the report have been reviewed and updated in 2024 and is presented in this revised report.





## 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. All child rights impact areas have been reviewed in the latest update. The materiality of the five impact areas is assessed to be unchanged since the last analysis, and no additional impact areas are added.

### Child online safety and digital inclusion

Through the services provided by Tele2 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 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 2024, Tele2 blocked 7.1 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.

In 2024, Tele2 Lithuania participated at the tech conference LOGIN in Vilnius to talk about child online safety, sharing both threats and concerns online – such as harassment and grooming in social media – and solutions and best practices to help mitigate these threats.

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>.

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

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

To help safeguard both adult and young users of Tele2's services, customers are offered technical safeguarding tools in all countries of operation: Tele2 Säker (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 2024, Tele2 conducted a survey with 1000 Swedish children and their parents on their online habits and experiences, and a study with in-depth interviews and focus groups with children and parents. The results were presented in Tele2's Family Internet Barometer, released in May 2025. The report is the most recent of a number of reports published since 2017 where Tele2 gathers insights on children's views of digital life. Tele2 also conducted a survey in 2024, targeting Lithuanian residents aged 18–65 who have children under 18. The study, based on responses from 400 participants, explored parental attitudes, behaviours, and concerns regarding children's online safety and the use of protective measures.

## 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.

Tele2 offers employee benefits that help create work-life balance, especially for employees with children. Tele2 offers flexible working hours for most employees<sup>3</sup> and have a "majority of time at the office" policy, meaning we offer the possibility to work from home up to 2 days per week. Tele2's employees are entitled to family-related leave in all markets. In Sweden, in addition to the 31.43 weeks of paid leave offered in line with local legislation, Tele2 offers additional compensation above the statutory parental leave of maximum 6 months, corresponding to approximately 90% of the employee's base salary. In Lithuania, employees with two or more children under 12 years old are allowed 1 day per month for childcare, in line with local legislation. In Estonia, employees are also granted additional days off for child leave up to 10 days per child.

In 2024, Tele2 Latvia was awarded the status of "Family-Friendly Workplace" by the Society Integration Foundation, after an assessment of their activities and initiatives. The assessment especially highlighted Tele2 Latvia's flexible working regime, high-quality health insurance, additional days off work during the

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<sup>3</sup> Excluding scheduled employees such as store- and customer operations representatives

winter holidays, and that children are welcome to spend time in Tele2's children's room at the office as positive examples of a family-friendly workplace.

In 2024, Tele2 hosted two events at the Swedish headquarters in Kista to involve employees that are parents. Tele2 hosted an "All hands – parents edition", where all employees on parental leave were invited to join a meeting with their children to both receive company updates and meet others on parental leave, in an effort to promote inclusion among employees who are parents. Tele2 also hosted Level up – a gaming event at the office where employees could bring their children to work for a gaming event during the autumn break. The purpose was to encourage parents to engage in their children's online activities, and to offer an activity during the autumn break.

## 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

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 Code is based on the 10 guiding principles of the United Nations Global Compact and encompasses fundamental human rights including for instance labour rights, child labour and anti-discrimination. 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>4</sup>.

## 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 complex from a regulatory and ethical perspective. These preconditions create a greater responsibility for companies in ensuring the respect for children's human rights through their marketing practices.

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<sup>4</sup> <https://www.tele2.com/sustainability/sustainability-governance/whistleblowing-policy/>

## 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, children may still 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.

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. In 2024, Tele2 had no cases of non-compliance involving marketing directed towards children. 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 defective products, e.g., mobile phones/chargers that become a fire hazard due to over-heating, chemical leakage from electronic devices (RoHS/REACH). The risks and impact related to the use of connected services are even more prevalent among children and young end-users, as described in the section *Child online safety and digital inclusion* of this report.

## 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's processing of data of end-users under 18 years old is limited to the information that is necessary for using Tele2's services as required by law. Tele2 complies with minimum ages and parental consent requirements as defined in the applicable law, GDPR. Information security and privacy incidents are reported in Tele2's Annual and Sustainability Report. In 2024, none of the reported cases have specifically concerned the breach of children's data. While children's data may be involved in general privacy incidents, the data collected of children is highly limited and therefore not specifically disclosed in the Annual and Sustainability Report.

## Status update on areas of improvement

Apart from identifying Tele2's most material child rights impact areas, the initial assessment in 2023 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. Below you will find a status update on these areas, and plans for future action going forward.

- Increased collaboration and consistency of initiatives across all markets

Since the previous assessment, Tele2 has continued its collaboration across markets, specifically related to sustainability reporting and data collection in line with the Corporate Sustainability Reporting Directive (CSRD). While ensuring consistency of initiatives is still work in progress, the consistency of data reporting on topics related to Tele2's child rights impact has improved, for example by including metrics on parental leave across all markets. Going forward, Tele2 aims to further integrate initiatives for child online safety across markets related to e.g. CSAM, and stakeholder consultations directly with children.

- Continued development of CSAM blocking to ensure all possibilities are exhausted

In 2024, Tele2 evaluated a potential implementation of the Internet Watch Foundation's CSAM blocking list in its networks. Results however indicated a high level of overlap with the domains provided through Tele2's implemented blocking lists from the Swedish Police, Interpol and Project Arachnid. As a result, the new list was not implemented. Compared to 2023, the number of blocked attempts to access CSAM in Tele2's networks have increased by 39% in 2024. This development could partly be influenced by an increasing number of attempts but is also attributed to enhancements in blocking lists maintained by the Swedish police and Interpol, as the large year-on-year increase indicates. Tele2 continues to evaluate potential new technical solutions and blocking lists to increase the blocking of CSAM.

- Publicly communicate on family friendly policies

The family friendly policies in place across Tele2's markets are communicated in the latest Annual and sustainability report, aligned with the requirements of the CSRD.

- Strengthen child perspective in evaluations of health and safety of products

In 2024, Tele2 has set out a plan for evaluation of products from a child rights and safety perspective and is planning to carry out an initial assessment during 2025.

- Integrate child rights perspective into supply chain management beyond child labour

Tele2's annual risk assessment and audit of its suppliers is a key part of the sustainability supply chain management. While no action has been taken during 2024, Tele2 is planning to update its method for these processes in 2025 to include a more detailed assessment of human rights, including child rights. This will enable more thorough and continuous mapping of current potential and actual child rights impacts in Tele2's supply chain.

## Next steps

During the 2024 review of the child rights impact assessment, Tele2 has identified additional areas of improvement, which are listed below. Tele2 is committed to undertaking actions to ensure that concrete improvements in these areas take place in the coming year.

- Increased collaboration across all markets
- Increased integration of child rights in sustainability reporting





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