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GEOCELL POLICY ON FREEDOM OF EXPRESSION IN TELECOMMUNICATIONS

BACKGROUND AND DESCRIPTION

Background

This document constitutes Geocell Policy on Freedom of Expression in Telecommunications (Hereinafter “Policy”) and is a binding document for Geocell and its Subsidiaries (if any) (Hereinafter “Geocell”).

Geocell is part of the Telia Group (Hereinafter “Group”) and as such required to adopt policies, instructions and guidelines that are compliant with the relevant Telia Group policy, instruction and guideline. Geocell CEO has secured approval of this policy from the relevant head of function at Telia Group. All instructions and guidelines that are adopted based on this policy shall be in compliance with the relevant Telia Group instruction and guidelines and Geocell CEO shall secure approval from the Telia Group Head of function prior to adopting instructions and guidelines.

This Geocell Policy is compliant with the Group Policy on Freedom of Expression in Telecommunications and is a binding document for Geocell.

Terms starting with a capital letter in this Policy are defined in the Delegation of Obligations and Authority approved by Advisory Board on November 23-rd, 2015.

Description

Geocell has adopted this Policy’s principles to define our standards for supporting and respecting the freedom of expression. The principles apply when governments or national authorities have requests or demands relating to the surveillance of communications, including restrictions on access to networks and Internet websites, signals intelligence etc. In our day-to-day operations, we expect Geocell employees to follow this Policy and consistently apply its high standards when doing business. We will strive to fully adopt these principles in all operations in which Geocell has management control. We will also use our influence to promote the principles in other companies where Geocell might have ownership interests.

SCOPE AND PURPOSE

Scope

This Policy applies to Geocell and for its Subsidiaries (if any) as their own binding policy. In addition, Geocell works towards adopting and implementing this Policy’s principles and objectives in all other operations in which Geocell has ownership interests.

This Policy is part of Geocell Governance Framework, which includes without limitation:

- a) Code of Ethics and Conduct, Purpose, Shared Values, Focus Areas, Strategy, Geocell Policies, and Instructions for the CEO as approved by the Board;

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- b) Decisions made by the CEO, and Geocell Instructions and the Delegations of Obligations and Authority as approved by the CEO; and
- c) Geocell Guidelines as approved by the Heads of Geocell Functions.

Detailed requirements on how to implement this Policy are presented in the 'Geocell Instruction for implementation of Geocell Policy on Freedom of Expression in Telecommunications'.

This Policy defines Geocell's commitments in relation to requests or demands that potentially could seriously impact the freedom of expression in telecommunications.

Such requests or demands addressed to Geocell may relate to:

- targeted surveillance in exceptional cases
- mass surveillance, where the authorities demand unrestricted real-time network access
- shutdown of all or parts of a network
- blocking or restricting access to specific services, Internet websites or content
- blocking or restricting individual customers' access to services or networks
- obligations to transmit mandatory communications issued by the government authorities
- significant changes or proposed changes in the law, or significant imposed or proposed operational changes, in the context of freedom of expression in telecommunications

In this Policy document, the umbrella term "surveillance of communications" is used to cover all these activities.

Purpose

Geocell does not engage in the politics. We do not comment on politics or make political statements when representing our company. However, Geocell does engage in dialogue on regulations that affect our business. Geocell has therefore adopted the following principles when encountering requests or demands with potentially serious impacts on freedom of expression in telecommunications. These principles apply to the extent that they do not place Geocell in violation of domestic laws and regulations, including license requirements and legal restrictions on disclosure.

Geocell supports international standards on human rights. Our principles are based on internationally recognised laws and standards for human rights, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR) as well as European Convention on Human Rights. They are also guided by the OECD Guidelines for Multinational Enterprises and the United Nations' Protect, Respect, and Remedy framework on business and human rights.

Freedom of expression is a fundamental human right derived from the inherent dignity of all persons. However, it should be borne in mind that freedom of expression is not an absolute right and is subject to certain limitations under both domestic and international law, with limitations being necessary and proportional.

The primary purposes of this Policy are to reduce human rights risks, and to make sure our customers feel confident that Geocell will, whenever possible, support, respect and safeguard their freedom of

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expression when we receive requests or demands from governments in relation to the surveillance of communications.

Through this Policy we aim to anticipate, address and minimise any potential impacts on freedom of expression that may arise when governments make requests or demands that are unlawful, or where governments or national authorities are believed to be misusing products or technology in violation of the human right to freedom of expression.

PRINCIPLES

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

A. Public advocacy, primarily by Local, Region and Group management, promoting the freedom of expression in telecommunications

1. We advocate clear and transparent legal provisions on proportionality and necessity for all government surveillance of communications. Vague, non-transparent and broadly conceived legal provisions are not appropriate when freedom of expression is at stake.
2. We argue that all government surveillance of communications, including international collaboration between authorities, should be conducted under the supervision of a court or some other independent judicial body. This will help to ensure transparency and accountability in relation to requests or demands made by governments.
3. We advocate that governments should not have direct access to a company's networks and systems. The company should retain operational and technical control.
4. We will encourage governments to be transparent about their use and scope of surveillance of communications. We will report transparently on Geocell's efforts in relation to surveillance of communications. We will inform stakeholders about major events whenever this is appropriate and within what is legally permissible.

B. Commitments in relation to requests and demands with potentially serious impacts on freedom of expression in telecommunications

5. We always strive to act in the best interest of our customers and the company. Risks to customers, including children and youth, relating to freedom of expression are integrated into our risk management processes to minimise possible negative impacts of government requests or demands.
6. We will comply with requests or demands relating to the surveillance of communications only to the extent required by law, including binding regulations and license requirements. We will also argue that all such requests or demands are submitted in writing and are signed by the appropriate government official.
7. We will enhance internal decision making to efficiently determine whether a request or demand could be in conflict with international standards of human rights because of serious impacts on freedom of expression. Where such impacts seem to exist, we will pursue all available lawful and feasible measures to avoid compliance, and/or minimise any negative impacts on the freedom of expression. If in doubt, we will always treat requests or demands as potentially having serious impacts on freedom of expression. Whenever governments demand real-time network access, we will make high-level reviews (e.g. at Group CEO level). We will also regularly review existing demands regarding real-time network access.

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8. We will define clear criteria, processes and responsibilities for assessing and determining the likelihood and seriousness of impacts on freedom of expression whenever we receive requests or demands relating to the surveillance of communications. We will provide guidance for the relevant personnel explaining how they should interpret and react to such requests or demands. We will also conduct training on such issues for staff within key functions and for our technical specialists. We will prioritise awareness raising and training in national contexts, where risks to freedom of expression are most severe. These criteria, guidance and training processes will be regularly reviewed.
9. We will always prioritise the safety and liberty of company personnel who can be put at risk when applying this Policy.

C. Other commitments

10. We will actively seek to provide products and services that can contribute to our customers' freedom of expression.
11. We will engage actively with other companies and other stakeholders to share our experiences and identify best practices in our field, as well as utilising guidance from the UN, the EU and other supranational organisations. We will also strive to provide accessible, secure and independent grievance mechanisms.

These principles apply to the extent that they do not place Geocell in violation of domestic laws and regulations, including license requirements and legal restrictions on disclosure.

ROLES AND RESPONSIBILITIES

Each Department Director and Manager reporting to the CEO of Geocell is responsible for ensuring that this Policy is duly communicated and implemented, and that the employees within his/her area of responsibility are familiar with and follow this Policy.

All Geocell employees are however individually responsible for reading, understanding and following this Policy. Each employee is also obliged to speak up and raise concerns about actual or possible violations of this Policy.

Violations of this Policy can lead to disciplinary action up to and including termination.

EXEMPTIONS

Any exemption(s) from this policy must be approved by Geocell's Advisory Board.

NOTE! For further information, also read the *Geocell Instruction – Freedom of Expression in Telecommunications*.