

# Telenor's status on Industry Dialogue Guiding Principles 2013

***Telecommunications companies should, to the fullest extent that does not place them in violation of domestic laws and regulations, including license requirements and legal restrictions on disclosure:***

*1. Create relevant policies, with Board oversight or equivalent, outlining commitment to prevent, assess, and mitigate to the best of their ability the risks to freedom of expression and privacy associated with designing, selling, and operating telecommunications technology and telecommunications services.*

Respect for human rights is included in Telenor Group's top governing documents, including our [Code of Conduct](#) and [Supplier Conduct Principles](#), which are approved by the Board of Directors. Policies apply Group-wide and are [approved](#) by the Group CEO. Corresponding Manuals detail the policy requirements further.

Telenor Group has a [long-standing commitment](#) to privacy, with a Group Privacy Officer and Local Privacy Officers working to implement our requirements. The Group Privacy Policy and Manual cover a wide range of issues, including authorities' access to personal data. In 2013 we updated our requirements relating to privacy & freedom of expression ([Annual Report, Human Rights](#)) reflecting the Industry Dialogue Guiding Principles. We strengthened particularly requirements with respect to handling authorities' requests for personal data, network shutdown, sending out SMS, and censorship. In 2014 we will focus on implementing the updated requirements.

Policies and manuals are updated regularly, and we will continue to assess the need for further updates and adjustments.

*2. Conduct regular human rights impact assessments and use due diligence processes, as appropriate to the company, to identify, mitigate and manage risks to freedom of expression and privacy – whether in relation to particular technologies, products, services, or countries – in accordance with the Guiding Principles for the Implementation of the UN 'Protect, Respect and Remedy' framework.*

Regular human rights due diligence is part of the Telenor Group policy requirements, and includes privacy & freedom of expression.

In 2013 we developed a toolkit to help our Business Units (BUs) conduct their own due diligence ([Annual Report, Human Rights](#)). We also conducted a Group-wide consultation when working with the update of requirements relating to privacy & freedom of expression (ref. Principle 1). This was a useful way of discussing challenges and potential mitigating measures. In 2014 we will focus on the implementation of the toolkit.

At Telenor Group we view due diligence as a process of continuous improvement. We have taken the first steps and will continue to work on this going forward.

*3. Create operational processes and routines to evaluate and handle government requests that may have an impact on freedom of expression and privacy.*

Responding to requests from law enforcement agencies is part of our requirements (ref. Principles 1 & 2) and include e.g. that requests are to be handled by dedicated and qualified personnel, following procedures for assessing the request at hand, and escalating if required.

While the 2013 update strengthened our Group-wide requirements, we are still in the process of implementing these and embedding them in BU routines.

*4. Adopt, where feasible, strategies to anticipate, respond and minimise the potential impact on freedom of expression and privacy in the event that a government demand or request is received that is unlawful or where governments are believed to be mis-using products or technology for illegitimate purposes.*

This is work in progress. Ref. responses to principles 1, 2 & 3 our Group-wide requirements outline some measures to anticipate, respond and minimise potential impact on freedom of expression and privacy. However, we are still at a stage where we are working to find the best approaches at BU level to respond to local operating contexts.

*5. Always seek to ensure the safety and liberty of company personnel who may be placed at risk.*

This is a fundamental principle in the Telenor Governing System and health, safety and employee security is included in our [Code of Conduct](#).

*6. Raise awareness and train relevant employees in related policies and processes.*

In addition to our general awareness activities connected with our [Code of Conduct](#), we have used various ways to communicate the key challenges related to freedom of expression and privacy. This includes e.g. a BU consultation process resulting in the update of our requirements (ref. principle 2) and pilot training programmes for key personnel. This is work in progress, and we will continue to develop this going forward.

*7. Share knowledge and insights, where relevant, with all relevant and interested stakeholders to improve understanding of the applicable legal framework and the effectiveness of these principles in practice, and to provide support for the implementation and further development of the principles.*

Telenor Group has through the Industry Dialogue (ID) been able to share knowledge and insights with both ID members and stakeholders. In addition, we have reached out to our stakeholders in Norway and internationally, and shared information about the work of the ID and Telenor. We also provide information on our activities as part of our sustainability reporting found in the Telenor Annual Report, and on [www.telenor.com/Sustainability](http://www.telenor.com/Sustainability).

*8. Report externally on an annual basis, and whenever circumstances make it relevant, on their progress in implementing the principles, and on major events occurring in this regard.*

Telenor's report on progress implementing the principles is included in this table.

Telenor Group reports annually on our sustainability performance. As pr. the Norwegian Accounting Act reporting on human rights, labour rights, anti-corruption and environment will be included in the

2013 Annual Report. Telenor Group does therefore not publish a separate Sustainability Report for 2013. Additional sustainability information can be found at [www.telenor.com/sustainability](http://www.telenor.com/sustainability).

*9. Help to inform the development of policy and regulations to support freedom of expression and privacy including, alone or in cooperation with other entities, using its leverage to seek to mitigate potential negative impacts from policies or regulations.*

Telenor Group engages with a range of stakeholders, including government and civil society, on a bilateral basis as *well* as through the Industry Dialogue.

*10. Examine, as a group, options for implementing relevant grievance mechanisms, as outlined in Principle 31 of the UN Guiding Principles for Business and Human Rights.*

During 2013 grievance mechanisms have been discussed as part of the *Industry* Dialogue meetings, and discussions will continue.