



Sustainability Policy

Arelion AB

Reg. no 559269-6305

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1 Introduction

The Group (Arelion AB and the Subsidiaries) has adopted the principles stated in this Sustainability Policy. In our day-to-day operations we expect every employee of The Group to follow this Policy as our way of conducting the business.

The CEO of The Group has ownership of the Sustainability Policy.

2 Building on our shared values

The Group owns and operates one of the world's most extensive fiber backbones. Our mission is to provide exceptional network infrastructure and services – empowering individuals, businesses, and societies to execute their most critical activities.

The Group has a long history of success because of fair and ethical business practices. We support international standards on human rights, labor conditions, the environment and anticorruption. The Group strives to act as one company, based on a common set of values, business principles and performance management. It is our objective to be a clean company and a good corporate citizen, living by our internal culture has always been our most valuable asset. That is why we need to leverage it further and put it at the forefront of our journey ahead.

We have three values guiding the way we behave and work together. By adhering to them, keeping them alive and using them as a guiding star in our daily work, we will ensure that our culture continues to be the cornerstone of our business - helping us to succeed in a fiercely competitive marketplace.

Our core values are: **Empower, Excite, Excel**

Empower means sustaining a caring culture. It means that we always empower customers, colleagues, and everyone around us - through trust, friendship, and mutual respect. We grow together, as individuals and as a business.

Excite means that we are engaged and engaging. It means that we should excite our customers and colleagues by showing our genuine passion for what we do, and for the world around us.

Excel is about the quality we deliver. It means that we are true professionals. We have the ability to focus, get things done and are fully accountable for the end result. We should get it right, first time and always rise to the challenge.

Working this way will ensure that we define quality in our industry. And it will allow us to continue keeping the world connected in the best way possible.

The Sustainability Policy sets the principles of our sustainability work and applies to all of us: employees, directors and members of the boards.



3 Definitions and commitments

The Group defines sustainability according to UNs 17 Sustainable Development Goals and intends to follow UN Global Compacts ten principles. Our sustainability ambition is to enable freedom of expression & transparency through the greenest network. The group identified three sustainability focus areas with clear targets and goals.

The focus areas are:

Minimizing Environmental Impact:

- Set targets, reduce, and measure CO2 emissions
- In our own operations we aim to reduce our energy consumption
- Reduce Waste
- Protection of biodiversity and ecosystems
- Protection of water resources

Social responsibility:

- Our workforce will reflect all the diversity of the markets in which we operate
- We care about every individual's right and opportunity including their safety and wellbeing
- We follow ILOs principles:
 - o Effective abolition of child labor.
 - o Elimination of discrimination in respect of employment and occupation.
 - o Elimination of all forms of forced or compulsory labor.
 - o Freedom of association and the right of collective bargaining.

Ethical Business:

- Ensure public access and actively work against corruption and bribery
- We protect and value our customers cyber security and data protection

4 Relationship with our stakeholders

The Group interacts with a variety of stakeholders: customers, business partners, competitors, coworkers, shareholder, governments, and regulatory bodies, as well as the communities in which we operate. Our relationships and communication shall be honest, fact-based and transparent within the bounds of commercial confidentiality. We value interaction and therefore encourage constructive dialogue with all our stakeholders. We advocate free and fair trade, striving for forthright competition and ethical conditions within the legal frameworks of the countries in which we operate.

4.1 Relationship with our customers

We strive to be the trusted, number one choice of current and potential customers, and aim to deliver high-quality and safe services that offer good value for money and contribute to our customers' success.

- We shall present our services and products in an honest manner; and we do not use unfair or deceptive practices.
- We shall never offer, authorize, or provide gifts, travel, payment, hospitality, sponsorships and donations in return for a favorable decision or business advantage.
- We carry out all financial activities with customers in a transparent and ethical way. We do not engage in deals that involve unconnected parties, unusual payment methods or abnormal terms and conditions.
- The Group does not deal with individual consumers; we conduct business only with Business – to – Business segment. However, we strive to operate highly secure communication networks, and we protect personal data of our customers' consumers and safeguard their privacy. We collect only relevant personal data that we need in order to provide our services and run our business. The data we do hold, we protect in terms of confidentiality and integrity and use only for the purpose we collected it for. When it's no longer needed for the purpose it was obtained for, we delete or anonymize it, unless mandatory legal data retention requirements apply. We take actions to prevent unauthorized access to personal data, only disclosing it when required by the law. We commit to and are accountable for complying with the law and our own high standards on privacy.

4.2 Relationship with our employees

The Group acknowledges that our employees are key to our success. Our aim is to be an attractive employer and we strive to attract, develop and retain qualified and motivated people in a professional working environment.

- We support the international human rights and dignity of all employees as outlined by the United Nations declaration and core International Labor Organization conventions.
- We do not accept any use of child labor or forced labor.
- All employees shall be treated fairly and equally. We aim to create a work environment where people are respected regardless of individual differences, talents or personal characteristics. No employee or candidate shall be discriminated against or harassed due to age, race, gender, religion, handicap, nationality, sexual orientation, marital or parental status or political opinion.
- We respect the fact that employees have the right to choose whether or not to be represented by a trade union for the purpose of collective bargaining. No employee who exercises this right shall be discriminated against. All employees should know the basic terms and conditions of their employment. Legislated minimum wages will always be a minimum rather than a recommended level.

- We aim to provide and constantly improve a safe and healthy workplace by ensuring safety in work processes, preventing and reacting to conditions of ill health and supporting measures to promote health and wellbeing. We are committed to providing employees with a drug-free workplace and will not tolerate any form of violence, abusive language or bullying.
- All employees shall exercise special care to prevent unauthorized disclosure or inappropriate use of company confidential information. However, we aim for openness, and encourage exchange of knowledge and experience within the boundaries of confidentiality.
- All employees shall process personal data fairly and lawfully in all operations including when processing such data outside the country where it has been collected. Employees shall process personal data only to the extent necessary for explicit and legitimate purpose applicable for that processing, while always paying attention to the protection of individuals' privacy. Processing of personal data should be limited to what is needed for operational purposes, employment matters, efficient customer care and relevant commercial activities, including the processing of anonymous user patterns.
- The Group shall process personal data of the Group employees only if the processing relies on legitimate processing criteria. The Group shall be transparent and informative about personal data processed about employees in the Group, so that employees understand how their data is used, and shall outline their rights related to this data.
- The Group employees shall avoid any contacts that might lead to or suggest a conflict of interest between personal activities and the business of The Group.
- The Group employees shall ensure that business travel and meetings are always productive and safe for them as an employee and organized with cost-effective providers. Travel is not always necessary – employees are encouraged to consider virtual collaboration and think of environmentally friendly options.
- Business gifts or hospitality shall be offered or accepted only in accordance with local legislation and business practices.
- Remuneration is based on fairness and non-discrimination
- The Group does not accept any form of use or possession of illegal or unauthorized drugs in the workplace.

4.3 Relationship with our shareholder

The Group aims for long-term, sustainable development of shareholder value. We inform our shareholder of all major developments that affect the valuation of the company promptly and transparently. We are truthful in our financial and non-financial communication, and information is given to the best of our knowledge. Our aim is full accountability.

4.4 Relationship with our suppliers, business partners and competitors

The Group aims to be a reliable partner to suppliers and contractors. We focus on long-term, good business relations and healthy cooperation. We expect our suppliers and contractors to support international standards on human rights, labor conditions, the environment and anticorruption. We encourage our suppliers to align their operations with principles that are similar to The Code – we consider this as an important criterion when establishing or continuing our business relations.

- In our operations worldwide, we do not request, authorize or receive bribes or other illegal payments, gifts, travel, or hospitality to obtain or retain business.
- We select suppliers purely on the basis of merit and make clear to all suppliers that we expect them to compete fairly and actively for our business.
- We select and evaluate suppliers and subcontractors on the basis of predetermined criteria such as quality, price, availability, delivery, reliability, service and corporate responsibility requirements, which include social and environmental aspects. Adherence to the principles of The Code shall be an integral part of legal contracts and agreements with suppliers.
- Business decisions and actions shall be based on the best interest of the company, our customers and shareholder. Therefore, decisions shall not be motivated by personal relationships or interests, and these shall not affect our independent and sound judgement.
- We strive to establish relationships with our business partners (e.g., consultants, agencies) based on mutual trust and in line with the intent of The Code.
- We carry out all financial activities with suppliers, business partners in a transparent and ethical way. We don't engage in deals that involve unconnected parties, unusual payment methods or abnormal terms and conditions.
- We do not enter discussions or agreements with competitors concerning pricing, market shares or other similar illegal activities.

4.5 Relationship with authorities, administrations, and other governing bodies

The Group ensures that all contacts and meetings with authorities, administrations and other governing bodies always take place in a professional and transparent manner. In our operations worldwide, we do not offer, provide, authorize a bribe or other illegal payments (e.g., facilitation payments) either directly or indirectly, including through any third party. We never offer gifts or business entertainment to public officials, or officials involved in public procurement to obtain or retain business.

4.6 Relationship with society

The Group is committed to bridging the digital divide by developing infrastructure and services that are accessible across our markets. Our services drive growth and economic development by creating direct or indirect job opportunities and financially contributing to the societies in which we operate. Our objective is to be a long-term, good corporate citizen.

- We operate with different offerings and price levels to make technology widely available and affordable.
- The Group does not engage in the politics of the countries in which we operate, nor do we make political donations. We do not comment on politics or make political statements when representing our company. However, The Group does engage in dialogue regarding regulations that affect our business.
- Sponsorships and donations are a great way of developing our business and supporting the societies in which we operate. We are careful to always plan and operate these ethically, in a way that supports our business objectives and creates social value.
- The Group acknowledges the concerns following legislative, administrative, license or law enforcement requirements to which we must adhere, but which may impact individual's privacy and freedom of expression. We protect and support freedom of expression and surveillance privacy through responsible decision-making and are as transparent as possible regarding the extent of government restrictions on communications and surveillance.

4.7 The environment

The Group is committed to conducting our business in an environmentally sustainable way. We contribute to global sustainability by developing, promoting and utilizing resource-efficient and environmentally friendly services and through our actions to minimize the environmental impact of our own activities.

- In our own operations we aim for efficient use of energy as well as to minimize related waste and CO2 emissions.
- Together with our partners and customers, we aim to reduce our carbon footprint, thereby fighting the climate change.

5 Division of responsibilities

The Board ratifies and approves all changes to the Sustainability policy, provides direction and ensures alignment towards the overall group strategy, provides steering and direction for management, defines objectives and restrictions and maintains own awareness and understanding of sustainability.

This Policy applies to the Group as a binding policy to all directors, members of the boards, officers and employees. Each General manager in the Group is responsible for ensuring that this Group Policy is duly communicated and implemented, and that the employees are familiar with and follow this Policy.

6 Governance Framework

This Policy is part of the Governance Framework, which includes without limitation the Code of Responsible Business Conduct, the Delegation of Obligations and Authority, and Instructions for the CEO as approved by the Board of Directors and other policies.

7 Cooperation with other stakeholders

The group shall be transparent and inform all relevant stakeholders about the business sustainability impact. By influencing, require and cooperate with other companies, authorities, and organizations the group contribute to a sustainable development in the world. The group demand equal sustainability ambitions and performance as we do on ourselves.