



TELE2 d.o.o.
za telekomunikacijske usluge
Ulica grada Vukovara 269 d
10000 Zagreb, Hrvatska

T +385 (0)1 63 28 300
F +385 (0)1 63 28 301
OIB 70133616033

Podaci o društvu: upisano u registar Trgovačkog suda 080492341
Poslovna banka: Privredna banka Zagreb d.d. žiro račun: 2340009-1110169306
Temeljni kapital 3.175.200.000,00 kn uplaćen u cijelosti
Članovi uprave društva: Malin Holmberg, Johan Bergström, Adrian Garrett, Viktor Pavlinić

July 9th, 2014
H.E. Ban Ki-moon
Secretary – General
United Nations
New York, NY 10017
USA

Dear Mr. Secretary – General,

I am pleased to confirm that Tele2 Ltd. Croatia supports the ten principles of the Global Compact with respect the human rights, labour, environment and anti-corruption.

With this communication, we express our intent to continue to advance those principles within our sphere of influence.

We are committed to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Millennium Development Goals. Tele2 Ltd. Croatia will make a clear statement of this commitment to our stakeholders and the general public.

We recognise that a key requirement for participation in the Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the ten principles.

We support public accountability and transparency, and therefore commit to continue to report on progress on an annual basis, according to the Global Compact COP policy.

Sincerely yours,

Malin Holmberg
Chief Executive Officer
Tele2 Ltd. Croatia

Communication on Progress Details

Self-assessment

- Includes an explicit statement of continued support for the UN Global Compact and its ten principles
- Description of actions or relevant policies related to Human Rights
- Description of actions or relevant policies related to Labour
- Description of actions or relevant policies related to Environment
- Description of actions or relevant policies related to Anti-Corruption
- Statement of continued support by the Chief Executive Officer
- Statement of the company's chief executive (CEO or equivalent) expressing continued support for the Global Compact and renewing the company's ongoing commitment to the initiative and its principles.

Human Rights

- Human rights related, Tele2 Croatia does business in compliance with national laws and regulations; thus has developed a number of people related policies and procedures which ensure that human rights are protected and that our people are respected and treated equally. The most relevant documents in that area are:
 1. Code of conduct; based on 10 principles of UN Global Compact. Document is created, implemented and regularly updated on Central level (last version December 2010) and covers the following area: safety of products and services, fair relationship with vendors and suppliers, business integrity (including anti-corruption, fair competition, conflict of interest, political involvement, financial reporting, corporate governance, treating people with respect) and environment. All employees are given a copy of the latest version of the code and, if necessary, they present it to our external partners. The code is always available to employees on company's common drive // shared files, along all other people related policies and procedures. The code identifies how irregularities in compliance with the Code can be reported (who is responsible person on Group level, his e-mail and phone number).
 2. Employee handbook; based on Croatian Labour Law. Document is available to all employees on company's common drive//shared files. The most relevant articles deal with anti-discrimination, i.e. they state that Tele2 will never directly nor indirectly discriminate against anyone based on race, colour of skin, sex, sexual orientation, religion, marital status, age, language, family status, political or other inclination, nationality, social origin, social status, union membership and physical and/or mental disability. Company made obligation that it will always

protect dignity of all employees and has identified a person to whom employees can report violation of any of the above mentioned factors

- Plan for the following years: continue with good practice, i.e. constant emphasis on importance of Code of conduct. Encourage managers to take more active role in monitoring the compliance with the Code while in parallel emphasizing and encouraging employees to stick to the code and, if necessary, report violations.

Labour

- Employees are informed about their rights and terms and conditions of their employment via: employment contract, HR Manager informs new employee during induction period on majority of personnel policies. All personnel related policies and procedures can be found and are available to all employees at all times on company's common drive// shared files. Managers also have a role to inform employees on their rights and obligations from employment contract.
Health and safety is done in accordance with Croatian Safety at Work Law. Tele2 has an Employee handbook on safety at work, available to all at all times on common drive//shared files. All employees are trained and have to pass exam on safety at work. Every two years Tele2 conducts an internal safety at work audit, in accordance with Safety at Work Law. A few positions within network operations department are identified to be positions with increased safety risk; thus those employees undergo regular medical check-ups and are sent to special training. Employees on such positions are provided with all necessary safety clothing and equipment.
Tele2 does not discriminate against any employee; there is no child labour, compulsory labour and employees are free to join union of their choice.
Tele2 provides fair pay which is on par and/or above market and industry rates.

Environment

- Assessment, policy and goals
- Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.
- Tele2 Croatia constantly strives to improve its procedures related to environment protection. All mobile devices in our offer are in accordance with EU ecological standards, while special care is taken in disposal of electronic devices/mobile phones.
Internally, Tele2 recycles paper, plastic and metal. Employees are

encouraged to print less while Tele2 is introducing more and more procedures in electronic form, i.e. electronic procurement. Next year we will continue improving/introducing environment friendly practices, e.g. our customers will be incentivised to replace old phone with a new phone while Tele2 will take care old phones are disposed according to ecological standards.

Anti-Corruption

- Tele2 Code of conduct states the following: No Tele2 employee or member of our Board of Directors may offer, ask, give or accept, directly or indirectly, any undue advantage for personal gain from any third party, unless it can be constituted as being within the boundaries of accepted business practices such as representation and reasonable hospitality given in the ordinary course of business. As guidance, no single gift or benefit should exceed the value of 50 Euro. When in doubt, employees are expected to seek advice from their managers.
In most countries gifts or benefits to government employees or public officials are considered a violation of law or regulation. Tele2 employees must not offer money or any gift to an official or employee of a governmental entity, except for symbolic gifts of insignificant monetary value provided this is allowed by local law.
As stated above the Code identifies how irregularities in compliance with the Code can be reported (who is responsible person on Group level, his e-mail and phone number).
Plan for the following years: Constant emphasis on importance of Code of conduct, encourage managers to take more active role in monitoring the compliance with the Code while parallel emphasizing and encouraging employees to stick to the code and, if necessary, report violations.