



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
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Članovi uprave društva: Viktor Pavlinić, Jasmina Gregurek

Tele2 Ltd. Croatia

Communication On Progress 2018

November 2017 - November 2018

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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
- ✓ Includes a measurement of outcomes

Tele2 Croatia does business in a way that encourages protection of all internationally proclaimed human rights and in accordance with all national laws and regulations; thus has developed people related policies and procedures, which ensure that human rights are protected, and that our people are respected and treated equally.

The most relevant document in that area Code of conduct (hereinafter: the “Code”):

- Based on the ten principles provided by the United Nations (UN) Global Compact.
- Created, implemented and regularly updated on Central level; adopted 2010, last revision 2018.
- 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 and business partners are obliged to read, acknowledge and act according to the latest version of the Code.

The Code is always available to employees on company's common drive // shared files // Intranet // Share Point, along all other relevant policies and procedures. The Code identifies how irregularities in compliance with the Code can be reported (responsible person on Group level, e-mail and phone number).

Below are references to the Code referring to the ten principles provided by the United Nations (UN) Global Compact that are embodied in the Code.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: make sure that they are not complicit in human rights abuses

"Tele2 employees are entitled to fundamental human rights which shall be known, understood and respected and be applied equally. No one shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. Forced labour, exploited or bonded labour is strictly forbidden. Employees shall not be required to lodge deposits or original identity papers as a condition for employment"

Measurement of outcomes:

All employees, managers and Board Members have read and signed Code of Conduct.

Code of Conduct training for Leadership Team members took place in October 2017 and training for Extended Leadership Team i.e. all Heads of Departments in December 2018.

All those managers are encourage to take more active role in demonstrating compliant behavior, monitoring the compliance with the Code and encouraging employees to stick to the code and, if necessary, report violations.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

"The rights of employees to freely associate and to bargain collectively, in accordance with the laws of the countries in which they are employed, shall be recognized and respected"

Principle 4: the elimination of all forms of forced and compulsory labour;

"Employees shall not be forced to work more than the limits on regular and overtime hours allowed by the law of the country in which they are employed. Overtime shall be compensated at the legally required rate. All employees shall have contracts specifying the terms of employment".

Principle 5: the effective abolition of child labour;

"Children under the minimum working age established by local law or fifteen (15) years, whichever is greater, shall not be used as labour force. Employees under eighteen (18) years shall not be engaged in hazardous or heavy work, or on nights shifts."

Principle 6: the elimination of discrimination in respect of employment and occupation;

“Tele2 believes in creating an inclusive work environment where everyone can be at their best. Building a diverse employee population is a key element of its approach to talent management. Tele2 does not accept discrimination, whether active or by means of passive support, whether based on ethnicity, national origin, religion, disability, gender, sexual orientation, marital or parental status, union membership, political affiliation or age.”

“Tele2’s approach to Diversity and Inclusion is set out in the Tele2 Diversity and Inclusion Policy in which further details are specified.”

Measurement of outcomes

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. All employees are entitled to join and/or organize any association.

Tele2 adopted Group Diversity and Inclusion Policy and signed Charter on Diversity Croatia.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility;

Principle 9: encourage the development and diffusion of environmentally friendly technologies

“Environmental laws and regulations applicable to local surroundings and the relevant business sector shall be complied with. Practices minimizing the impact on the environment shall be encouraged and care shall be taken with any environmentally sensitive substances or processes. Tele2 promotes a sustainable development and cost efficiency by proactively reducing resource consumption and thus the impact on the environment. Tele2’s environmental efforts are guided by the Tele2 Environmental Policy in which further details on our environmental work are specified.”

Measurement of outcomes

Tele2 very seriously understands its impact on climate change. In 2016, we launched an energy optimization project for the entire Tele2 Group (Go Green). This implies adjusting the energy consumption of our radio stations to the amount of traffic in the network, which results in the savings of electricity.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

"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.

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."

Measurement of outcomes

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All those managers are encourage to take more active role in demonstrating compliant behavior, monitoring the compliance with the Code and encouraging employees to stick to the code and, if necessary, report violations.