

Myanmar Foreign Investment Tracking Project – Telenor Group Response

1. *Does your company have investments or operations in Myanmar or is it seriously considering investing or operating there? If so, please provide information on the nature of these investments, and which geographic areas and communities they will affect.*

Telenor Myanmar is a business unit in the Telenor Group providing mobile communications. Telenor obtained licenses in Myanmar in February 2014 and launched mobile voice and internet services using 2G and 3G GSM technology in the autumn of 2014. We plan to cover 90% of the population of Myanmar within five years.

For more information on Telenor Myanmar:

<https://www.telenor.com.mm/pages/telenor-at-a-glance/77>

<https://www.telenor.com.mm/pages/telenor-myanmar/147>

<http://www.telenor.com/media/in-focus/telenor-in-myanmar/>

2. *Do you have policies and procedures in place to prevent your business activities or investment from contributing to human rights abuse and social conflict in Myanmar (including, for example, human rights due diligence measures)? Please specify whether these policies and procedures apply to your company in general, or specifically to your Myanmar investment. If you have human rights policies and procedures regarding investing or operating in Myanmar, are you willing to share them for posting on our website? If so, please send them as a Word or PDF file, or, if available, as a hyperlink.*

The Telenor Group has governance documents setting out principles for how business shall be conducted. These apply to all Telenor business units (BUs).

<http://www.telenor.com/about-us/corporate-governance/>

Our Code of Conduct, which is our top governing document, covers a range of sustainability issues, including e.g. human rights,

<http://www.telenor.com/about-us/corporate-governance/code-of-conduct/>

Our policies and manuals provide further detailed group-wide requirements, including e.g. human rights due diligence requirements.

You can read more about how we implement this Group-wide:

<http://www.telenor.com/sustainability/>

and e.g. human rights:

<http://www.telenor.com/sustainability/human-rights/>

and in Myanmar:

<http://www.telenor.com/media/in-focus/telenor-in-myanmar/sustainable-business-in-myanmar/>

<https://www.telenor.com.mm/lists/sustainability/152>

You can also watch the Sustainability Update given by our Group and Telenor Myanmar CEOs here:

<http://www.telenor.com/investors/presentations/2014/sustainability-in-myanmar/>

3. *Who in your leadership is responsible for ensuring compliance with the policies and procedures in no. 2?*

The Telenor Group Code of Conduct is approved by the Board of Directors. Policies are approved by the Group CEO, and implemented through a system of policy owners and managers at senior levels in our Business Units (BUs).

<http://www.telenor.com/about-us/corporate-governance/>

The Governance Work Programme is an annual process which drives the process of updating, implementing and monitoring of Group Governing Documents

4. *If you do not yet have human rights policies and procedures in place, do you have plans to develop them? If so, what efforts are you currently engaged in or plan to engage in on this regard?*

N/A

5. *How does your company try to prevent or mitigate conflicts that affect its operations or the surrounding communities (including armed conflict, inter-communal conflict and violence, etc.)? Could you please list your policies, procedures or concrete activities in this regard, including community engagement and dialogue measures and revenue sharing agreements?*

As outlined in our Sustainability Update we have established a community outreach program with state liaison officers that act as link between ethnic groups and Telenor. See update:

<http://www.telenor.com/investors/presentations/2014/sustainability-in-myanmar/>

6. *Who should communities or civil society groups contact if they have questions or concerns about your investment or operations in Myanmar? Please provide their contact information.*

For general queries to Telenor Group please see:

<http://www.telenor.com/sustainability/contact-group-sustainability/>

Telenor also has a hotline to compliance throughout the Group. All communications are treated confidentially. Telenor Myanmar has also established a local hotline and an internet contact address to which external parties may report grievances related to sustainability issues.

The grievance phone number is +95 (0) 09250405394, and the e-mail address is report@telenor.com.

<https://www.telenor.com.mm/pages/sustainable-business-in-myanmar/85>

7. *We further invite you to respond to questions specific to your industry. Does your company have policies and procedures in place to address each of the following areas? If so, please provide details:*

Information on most of the areas below are covered in the Sustainability Update and on our website:

<http://www.telenor.com/investors/presentations/2014/sustainability-in-myanmar/>
<http://www.telenor.com/media/in-focus/telenor-in-myanmar/sustainable-business-in-myanmar/https://www.telenor.com.mm/lists/sustainability/152>

An additional focus area for Telenor is anti-corruption. Telenor's zero tolerance on corruption and ethical standards are set out in the Code of Conduct, Group Policy Anti-Corruption and other Governing Documents, to which all employees must adhere.
http://www.telenor.com/wp-content/uploads/2014/12/Governance-and-Anti-Corruption-in-Telenor_Summary.pdf

- a. Freedom of association and collective bargaining

Please see:

<http://www.telenor.com/sustainability/human-rights/respect/>

- b. Workplace health and safety

Please see:

<http://www.telenor.com/sustainability/health-safety-and-security/>

- c. Child labour

Please see:

<http://www.telenor.com/sustainability/human-rights/respect/>
<http://www.telenor.com/sustainability/supply-chain-sustainability/>
<https://www.telenor.com.mm/pages/Responsible-Supply-Chain-Management/87>

- d. Forced labour

Please see:

<http://www.telenor.com/sustainability/supply-chain-sustainability/>
<https://www.telenor.com.mm/pages/Responsible-Supply-Chain-Management/87>

- e. Anti-discrimination (whether based on race, gender, religion, nationality, etc.)

Please see:

<http://www.telenor.com/career/work-environment/>

- f. Environment

Please see:

<http://www.telenor.com/sustainability/environment-and-climate/>

<http://www.telenor.com/media/in-focus/telenor-in-myanmar/sustainable-business-in-myanmar/environment/>

<https://www.telenor.com.mm/pages/environment/96>

g. Land rights

Please see:

<http://www.telenor.com/media/in-focus/telenor-in-myanmar/sustainable-business-in-myanmar/land-rights/>

<https://www.telenor.com.mm/pages/Land-rights/89>

h. Privacy and freedom of expression

Please see:

<http://www.telenor.com/sustainability/human-rights/mitigate/>

<http://www.telenor.com/media/in-focus/telenor-in-myanmar/sustainable-business-in-myanmar/privacy-freedom-of-expression/>

<https://www.telenor.com.mm/pages/Privacy-Freedom-of-Expression/88>

<http://www.telenor.com/sustainability/privacy-and-data-protection/>