



16 October 2019

Peter Micek  
General Counsel  
Access Now

Dear Mr Micek,

Thank you for your letter dated 2 October 2019.

At Telenor Group respect for human rights is integral to our business, clearly stated in our policies, and approached with a focus on continuous improvement. As a global company, Telenor acknowledges that we do face human rights challenges in markets where we operate, and we work to understand and mitigate negative human rights impacts we may have.

We were pleased to see that Telenor ranked fourth out of 12 telecommunications companies in the 2019 Ranking Digital Rights (RDR) Corporate Accountability Index, especially given that this was the first time Telenor was included in the index. We were also pleased that Telenor was found to disclose strong corporate governance and oversight over human rights issues across its global operations. Many of the parameters where Telenor's rating was low have to do with either private requests or requests for restrictions of individual accounts. Across our footprint we receive few requests to restrict individual accounts and few requests from private individuals to limit the freedom of expression of other subscribers. Therefore, we have not seen the same need to provide this information. However, we are reviewing this to see what a better solution would be going forward.

In your letter you have specifically highlighted the following recommendation by RDR: *'Telenor should disclose more detailed data about its compliance with government requests to restrict content or accounts and to hand over user information'*.

Telenor processes government requests in accordance with the Global Network Initiative principles. We follow domestic legal processes, request governments to explain the legal basis of requests and seek ways to avoid or minimise the impact of government restrictions on privacy and freedom of expression. We publish an annual transparency report which indicates the number of requests received from authorities by our businesses in each country. The report covers requests in the following categories: communication data, lawful interception, network shutdowns, content restrictions and content distribution. We recognise there are limitations to the report, including a limitation based on what we are permitted to report. For further information, please see our [2018 Authority Requests Disclosure Report<sup>1</sup>](https://www.telenor.com/wp-content/uploads/2019/03/Telenor-Authority-request-report-2018.pdf). In our 2018 report, we were able to publish more information than in the 2017 report. For our 2019 disclosure report we are working towards making more information publicly available and are making continuous efforts to increase the level of transparency around these areas. As this is the first time Telenor has been included in the index we have welcomed the opportunity to learn from the process and to better understand what our stakeholders expect

---

<sup>1</sup> <https://www.telenor.com/wp-content/uploads/2019/03/Telenor-Authority-request-report-2018.pdf>

from us. Indeed, we engaged with RDR in their assessment process and have continued to engage with RDR following the launch of the 2019 index in May. The purpose of our continued engagement has been both to learn more from the findings as well as to provide feedback to their methodology.

We work to continuously improve our policies and practices across our operations around digital rights and are pleased to see that these efforts are being recognised, whilst also acknowledging that further efforts to improve can and will be made going forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Anne Kvam". The signature is written in a cursive, flowing style.

Anne Kvam  
Chief Corporate Affairs Officer  
Telenor Group