



Questions to the parties in preparation of Final Statement

Due diligence and responsible disengagement

To Telenor:

1. Please share documentation of relevant human rights policies and human rights due diligence (HRDD) conducted prior to the disengagement from Myanmar, as well as documentation of HRDD during and after the disengagement.
2. Please provide information particularly regarding consultations with employees and their representatives regarding the future scenarios and plans for Telenor during and after the disengagement.
3. What were Telenor's conclusions when assessing the risk for former employees and customers after the sale, and specifically the sale to M1-group and the local partner Schwe? Please also describe the main approach/method applied in the assessment and the rationale for choice of the approach/method.
4. Please provide any further information on measures/actions taken by Telenor to protect their employees, as well as customers, during the disengagement period.

To both parties:

5. What should be key considerations on responsible entry and disengagement by companies supplying and operating a country's critical infrastructure and telecommunications, particularly in contexts with potential for human rights abuses through government-imposed restrictions and regulations?
6. What lessons learned and/or guidance can this case provide for companies considering disengagement in other conflict-affected contexts?
7. Do you think there are any specific learning points for telecommunications companies in this regard? If so, what are they?



8. How can companies in disengagement situations increase their leverage and mitigate risks in collaboration with others?
9. What could responsible disengagement look like in the context of the present case?

Risk mitigation and remedy

To both parties:

10. What can be appropriate remedy mechanisms and remediation for handling negative impacts related to telecommunications companies disengaging from conflict-affected areas?
11. What would be a reasonable role for Telenor to play in terms of risk mitigation and remedy when disengaging from Myanmar, both by financial and non-financial means? Alone and/or jointly with other actors?
12. What role could a digital security relief mechanism, based on recommendations in the Myanmar ICT Ecosystem Study, play in this case; what is required for it to become reality, how could it be governed and how could any risks arising from such a mechanism be mitigated?
13. What would be a possible way to identify and remedy any harm to employees after a telecommunications company has disengaged from a country due to unacceptable human rights risks related to its operations?

Forward looking recommendations and follow-up

To both parties:

14. What should be key action points moving forward from where the specific instance stands now, also in relation to continued follow-up of the [MoU](#)?
15. What progress should be expected within one year?