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Organisation number
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This letter is sent by email only.

Initial Response to Complaint filed by Adeeba Zerine Chowdhury and Mr Rasoul Amin Murad — Request that the NCP Decline to Take Up the Matter for Further Consideration

1. Introduction

Telenor ASA ("Telenor") refers to the complaint from Ms Adeeba Zerine Chowdhury and Mr Rasoul Amin Murad (together, "the Complainants"), received by the National Contact Point for Responsible Business - Norway ("NCP") on 17 February 2026. Telenor is grateful for the opportunity to submit initial comments and respectfully requests that the NCP determine that the complaint does not merit further consideration for the reasons set out below.

2. Background

Grameenphone Ltd. ("GP"), a company operating mobile telecommunications services in Bangladesh, is listed on Dhaka Stock Exchange and subject to Bangladeshi laws and regulations. Telenor owns approximately 56% of the shares in GP. The complaint is directed against Telenor ASA as the parent company, with GP identified as the subsidiary in Bangladesh in relation to which the alleged conduct has taken place.

The Complainants allege breaches of Chapter IV (Human Rights), Chapter V (Employment and Industrial Relations), and Chapter II (General Policies) of the OECD Guidelines for Multinational Enterprises ("the Guidelines"), arising from the termination of certain former employees / union



committee members following the submission of a union registration application in July 2012 and the subsequent court proceedings in Bangladesh.

Telenor disputes the characterisation of events set out in the complaint and denies that any conduct attributable to Telenor constitutes a breach of the OECD Guidelines. However, for the purposes of this initial response, Telenor sets out below the reasons why the NCP should determine at the initial assessment stage that the complaint does not and should not merit further consideration.

It is also relevant to note that the Complainants appear to occupy a peripheral role in the current activities and governance of GP Employment Union (“GPEU”) and it is uncertain whether they can be said to represent the GPEU. These circumstances raise questions as to the extent to which the Complainants can be said to represent the interests of the union or its broader membership, circumstances which are thus relevant to the NCP's assessment of the materiality and representativeness of the complaint.

3. Framework for the initial assessment

The OECD Guidelines and the accompanying Procedural Guidance establish that an NCP must conduct an initial assessment of whether a complaint merits further consideration. The relevant criteria, as set out in the Procedural Guidance, include:

- whether the issues raised are material and substantiated;
- whether the NCP's consideration of the issues would contribute to the purposes and effectiveness of the Guidelines;
- whether there are relevant domestic or other international procedures that have been or are being pursued; and
- whether the issues raised are more appropriately addressed in another forum.

For the reasons set out below, Telenor submits that these criteria weigh decisively against taking the matter up for further consideration.



4. The complaint concerns matters that are being actively considered by competent domestic and international forums

4.1 Ongoing Domestic Court Proceedings in Bangladesh

The most fundamental reason why the NCP should decline to take this matter up is that the issues raised in the complaint are long-standing and are the subject matter of ongoing litigation and dispute resolution processes in the legal system, including in the courts of Bangladesh.

The Complainants themselves acknowledge that they challenged their terminations in court in 2012, a case that remains pending, and that the Appellate Division of the Supreme Court of Bangladesh finally declared the cases maintainable in 2023, with proceedings in the Labour Court still ongoing.

The OECD Guidelines Procedural Guidance is clear that where matters are simultaneously before the courts or other competent forums, the NCP should take this into account in determining whether to take up the matter for further consideration, and may decline to do so where such consideration would prejudice or duplicate those proceedings. The substance of the complaint — namely, the lawfulness of the terminations and the conduct of GP during the court proceedings — is precisely what the Bangladeshi courts are adjudicating.

4.2 Active ILO Proceedings

The International Trade Union Confederation (ITUC) submitted information on the circumstances related to Ms Chowdhury to the ILO Committee on Freedom of Association ("CFA"). These circumstances are part of ongoing proceedings in the CFA committee registered as CFA Case No. 3263. The ILO case concerns a broader matter directed at Bangladesh as a state relating to freedom of association, brought by several international trade unions. The circumstances related to Ms Adeeba Zerine Chowdhury were added to the ILO case on 23 September 2022 as an example of, among other things, lengthy legal proceedings.

The ILO CFA, in its Interim Report No. 408 of October 2024, has issued a recommendation urging the Government of Bangladesh to take measures to ensure that the case concerning Ms Chowdhury's complaint of anti-union discrimination is concluded without further delay. There is also a broader effort by the ILO directed at the authorities in Bangladesh under ILO Article 26, independent of the above-mentioned case. As part of this effort there has e.g. been established a road map which includes the topic of lengthy legal proceedings in Bangladesh (see action point 3.3 on p. 12). This report, on the ILO Article 26 process, is publicly available here: [Report by the Government of Bangladesh on progress made in the implementation of the road map to address all outstanding](#)



[issues mentioned in the article 26 complaint concerning alleged non-observance of Conventions Nos 81, 87 and 98](#)

The ILO CFA is the competent international forum specifically designated to address complaints regarding freedom of association and the right to organise, including issues such as judicial proceedings. The ILO process is actively engaged with the very same allegations that form the core of this NCP complaint. It would not contribute to the effectiveness of the Guidelines for the NCP to duplicate this process. The NCP should defer to the ILO CFA as the more appropriate and specialised forum for the issues raised.

5. The complaint is not sufficiently material and substantiated as against Telenor ASA

5.1 The conduct alleged is that of a listed company in which Telenor is one of many shareholders, not of Telenor ASA

The OECD Guidelines apply to multinational enterprises in respect of their own conduct. While the Guidelines do address supply chain and subsidiary relationships, they do not render a parent company automatically responsible for each and every act of a subsidiary. Telenor acknowledges that it is a part-owner of GP and notes that although the issues raised are a local matter that must be handled within the framework of local law, Telenor, as a part-owner, has ownership expectations for its business in Bangladesh.

The operative conduct alleged in the complaint — the termination decisions taken in July 2012, the conduct of litigation in Bangladeshi courts, and operational management of employee relations — is conduct of GP, a locally incorporated company operating under Bangladeshi law.

As per information from GP, the complainants were terminated and did not accept any severance package nor did they take their lawful dues, and the Dhaka High Court has ruled that terminated employees cannot be part of GPEU nor hold office within GPEU. The complaint does not set out with specificity any conduct by Telenor ASA at the group level that would give rise to a breach of the Guidelines on the part of Telenor itself.

5.2 Telenor has exercised appropriate ownership oversight

Far from being indifferent to conditions at GP, Telenor has long maintained the position that it supports employees' right to organise, and this is reflected in the Telenor Group People Policy, which applies throughout the Telenor Group. As part of Telenor's strategy to strengthen employee



involvement, Telenor entered into a global framework agreement with UNI Global Union in 2013 and has maintained a good collaboration with UNI Global Union since then. It is also worth mentioning that the formation of GPEU was one of the first in the service section in Bangladesh.

Telenor also has dialogue with Norwegian Group Corporate Union representatives (Konserntillitsvalgte) employee representatives regarding conditions in Bangladesh and actively works on competence development and exchange of experience with GP. Latest, a workshop was held at Fornebu in 2022 with UNI Global Union, employee representatives from GPEU, and HR from both Telenor Group and GP.

Representatives from Telenor Group has regularly travelled to Bangladesh since 2012. As recently as September 2025, representatives from HR in Telenor Asia and HR from Telenor Group travelled to Bangladesh to follow up on relevant topics and compliance with the Group People Policy. In addition, there is regular dialogue.

These measures are examples demonstrating that Telenor has taken and is taking a responsible ownership approach consistent with the spirit of the OECD Guidelines. The complaint does not identify any failure of oversight on Telenor's part.

6. The core dispute concerns the lawfulness of conduct under Bangladeshi law, not a failure to observe the OECD Guidelines

Whether or not the terminations in 2012 were unlawful under Bangladeshi law is a matter for the Bangladeshi courts and the issue has been subject to litigation in the Bangladeshi courts since 2012, and are still ongoing. GP's publicly stated position is that the former employees were terminated and offered all lawful entitlements based on applicable laws and her employment contract, that the employee declined to receive those entitlements, and that GP has been taking steps to defend itself in the lawsuit based on available, legal avenues.

GP has stated that it has been adhering to the procedures of the Court, complies with the law of the land, and upholds the rights of its employees.



The NCP is not the appropriate forum to adjudicate on questions of Bangladeshi labour law or to preempt the outcome of pending Bangladeshi court proceedings. To do so would undermine the authority and independence of the Bangladeshi judiciary and would not contribute to the purposes of the OECD Guidelines.

7. The complaint raises allegations regarding the conduct of litigations which are matters for the courts

A central element of the complaint is the allegation that GP has employed delay tactics in the Bangladeshi court proceedings, including repetitive time petitions and applications to challenge the maintainability of the cases. The complaint characterises the conduct of the litigation as a "war of attrition."

While it is well recognised that systemic delays in the disposal of cases are a prevalent feature of the judicial system in Bangladesh, Telenor's clear understanding is that the conduct of litigation by a party before a national court — including decisions about procedural strategy — is a matter that falls within the exclusive jurisdiction of that national court. The courts of Bangladesh have supervisory authority over the conduct of proceedings before them and are the appropriate bodies to address any concerns about procedural abuse or delay. The NCP is not a suitable forum to second-guess the litigation strategy of a party to proceedings before a foreign court, and doing so would set a deeply problematic precedent.

8. The complaint also raises broader matters that are separately sub-judice or subject to other processes

The reference to the "rightful dues of 4,000 employees" referred to in the complaint is a separate matter concerning the WPPF (Workers' Profit Participation Fund) calculation date, which is also sub-judice in Bangladesh. GP has made public statements on the WPPF dispute: [Grameenphone Statement on WPPF Dispute \(2010–2012\)](#)



These matters are entirely separate from the individual termination claim and should not be conflated with it. In any event, the WPPF-related claims are also subject to active and ongoing judicial proceedings in the courts of Bangladesh and are thus not appropriate for NCP consideration.

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For the reasons set out above, Telenor respectfully submits that the NCP should determine at the initial assessment stage that this complaint does not merit further consideration. In summary:

1. **Ongoing domestic proceedings:** The substance of the complaint is being actively adjudicated by the courts of Bangladesh, where the matter has been pending since 2012 and is progressing through the judicial system.
2. **Active ILO proceedings:** The very same allegations regarding freedom of association and union-related termination are the subject of active ILO CFA proceedings (Case No. 3263), which is the internationally competent specialised forum for these issues.
3. **No sufficiently substantiated conduct attributable to Telenor ASA:** The complaint does not identify conduct by Telenor at group level that would amount to a breach of the Guidelines; the alleged conduct is that of the locally incorporated subsidiary, GP Ltd.
4. **Responsible ownership conduct:** Telenor has exercised appropriate ownership oversight, including through the Group People Policy, the global framework agreement with UNI Global Union, and direct engagement with GP on employee relations matters.
5. **The NCP is not the appropriate forum:** The core questions of Bangladeshi labour law, the lawfulness of the 2012 terminations, and the conduct of domestic litigation are all matters for the Bangladeshi courts.
6. **Risk of duplication:** Consideration by the NCP would overlap with both the domestic court proceedings and the ongoing ILO process, without contributing to the effectiveness of the Guidelines.

Telenor remains committed to responsible business conduct, including in its operations in Bangladesh, and is willing to engage constructively with the NCP if the NCP nonetheless determines that the matter merits further consideration.

Sincerely

Patrik Hiselius
Director Human Rights & Inclusion