National Contact Point for Responsible Business Conduct | Norway

Oslo, 10 September 2026

Initial Assessment

Terminated employees and union leaders in Grameenphone vs. Telenor ASA

The National Contact Point for Responsible Business Conduct (NCP) contributes to the resolution of issues that arise relating to the implementation of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) in specific instances. The objective of an initial assessment is to determine whether the issues raised in the specific instance warrant further examination. If so, the NCP will offer or facilitate access to consensual and non-adversarial procedures, such as dialogue or mediation ('good offices') to the parties.

The NCP has at this stage made no determination as to whether the company has acted consistently with the Guidelines. As specific instances are not legal cases and NCPs are not judicial bodies, NCPs cannot impose sanctions, directly provide compensation nor compel parties to participate in a mediation.

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Executive summary

1. On 9 February 2026, the Norwegian NCP received a complaint from 21 terminated employees and union leaders in Grameenphone in Bangladesh relating to the company's majority owner Telenor ASA. The Complainants contend that Telenor ASA has failed to observe the recommendations of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) with respect to risk-based due diligence, use of leverage and "ethical oversight" with its subsidiary Grameenphone. The complaint concerns freedom of association, payment of statutory entitlements to employees, and long-lasting domestic legal processes relating to these issues.

2. The NCP has considered the admissibility criteria of the initial assessment process and has determined that some of the issues raised in the submission warrant further consideration and will offer its good offices to the parties.

1. Substance of the submission

3. On 9 February 2026, the Norwegian NCP received a complaint from Adeeba Zerin Chowdhury, the Communication Secretary of the Grameenphone Employees Union (GPEU) at the formation of the union in 2012, on behalf of herself and 20 other union members at that time (the Complainants). The complaint alleges non-adherence to the Guidelines by Telenor ASA (Telenor) due to inadequate due diligence and failure to exercise leverage and "ethical oversight" with respect to the activities of its subsidiary Grameenphone Ltd. (GP) in Bangladesh.

4. GP is the largest mobile telecommunications operator in Bangladesh, of which Telenor owns 55,8 percent.[1] The share was the same in 2012.[2] Telenor entered the Bangladeshi mobile market in 1996 and established the mobile operator GP, which was listed on the stock market in 2009.[3] Today, five of ten members of GP's Board of Directors come from Telenor, including the chair.[4] In 2012, the number was five of ten, also including the chair[5]

5. The complaint concerns freedom of association, the right to organise, statutory entitlements and access to remedy. The complaint describes alleged illegal terminations related to the formation of GPEU in 2012[6], prolonged legal proceedings related to terminations of 21 GP

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[1] Telenor Group 2026 Ownership Structure | GP
[2] Grameenphone Annual Report 2012 Directors Report, p. 75.
[3] Telenor Group 2004 Telenor to increase its ownership stake in GP to 55.5 per cent
[4] Telenor Group 2026 Board of Directors | Grameenphone
[5] Grameenphone Annual Report 2012 Directors Report, p. 60.
[6] GPEU received its union registration from the Bangladeshi labour authorities on March 7, 2019.
GP employees allowed to form union | The Daily Star
After a 7-year struggle in Bangladesh, Grameenphone Employees Union wins recognition

employees as well as legal proceedings related to alleged statutory entitlements for around 4000 GP employees under the Workers' Profit Participation Fund (WPPF)[7] in Bangladesh.

6. The Complainants state that 24 hours after submission of the union registration application on 23 July 2012, more than 200 union members were illegally terminated due to their union involvement. Among them were seven union committee members, including the president, vice-president and communication secretary. The Complainants state that the terminations violated domestic labour law and international labour standards with respect to the freedom of association and the right to organise. The Complainants refer to Section 186 of the Bangladesh Labour Act (2006),[8] according to which an employer cannot alter terms and conditions for an office bearer of a union or terminate employment for a union member while an application for registration of a trade union is pending.

7. GP had started a retrenchment plan in 2012. The Complainants claim that the restructuring was a calculated evasion of the Labour Act and that GP set up an assessment process to bypass legal scrutiny targeting senior workers and those who supported the formation of a union, instead of following the principle of last in-first out as required by the law.

8. The Complainants allege that following the terminations, GP pressured terminated employees to submit voluntary resignation emails to receive an exit package or otherwise face termination with standard compensation and risk retention of mandatory benefits and experience letters. They contend that GP, in the period of 2012-2021, demonstrated a systematic pattern of coercive discharges, referring to other incidents in 2015 and 2021.

9. The three union leaders (president, vice-president and communication secretary) did not accept the termination and filed legal claims. Further, another 19 of the 200 terminated union members, who had through settlement obtained special financial packages and resigned from service, also instituted legal action. Hence, a total of 22 former employees initiated formal legal proceedings before the 1st Labour Court in September 2012, challenging the lawfulness of their termination by GP Management, as well as their subsequent resignation packages as applicable.[9] The legal proceedings are still ongoing. The Complainants state that GP has effectively utilized petitions and procedural delay to exhaust the union. In 2023 the Supreme Court declared the cases to be "maintainable", and they were returned to the Labour Court.

10. The Complainants contend that GP continues to use the same "delay tactics" and they fear that the cases will continue for another 10-20 years. The Complainants argue that the

[7] Bangladesh Labour Act, 2006, Ch XV Workers participation in companies' profit
"The Workers Profit Participation Fund (WPPF) is a fund set up by an employer to share a portion of the company's profits with the workers. It's a way of rewarding employees for their contribution to the company's success." – Recom: Provident Fund, Gratuity Fund, and WPPF: Differences
[8] Bangladesh Labour Act, 2006
[9] One of the 22 employees did not go through with the proceedings. Thus, the number was 21.

prolonged court proceedings violate the workers' right to access to remedy and have been a barrier to constructive engagement in non-judicial grievance mechanisms.

11. In 2022, the Complainants and GP engaged in an alternative dispute resolution (ADR) process, initiated by the union, but without success. The Complainants allege that the company did not participate in good faith and that the Head of Industrial Relations stated that the company had no financial or strategic incentive to settle the matter through ADR when "they could 'linger the case for many years in court' due to the slow judicial system in Bangladesh."[10]

12. According to the Complainants, GP has also used tactical delays in court proceedings with respect to accrued interest and penalties related to delays in paying alleged statutory obligations under the Workers' Profit Participation Fund, which constitutes a violation of domestic law.[11] The Complainants further state that GP in 2014-2015 pressured employees to accept a principal amount instead of their entitlements. This and a delay in payment has, according to the submission, resulted in severe socio-economic hardship for around 4000 families.[12]

13. In 2022, Chowdhury lodged a formal complaint with the ILO Committee on Freedom of Association (CFA) through ITUC. In 2024, the CFA took note of "the extremely slow pace of justice in handling the complaint of Ms Chowdhury" and urged the Government of Bangladesh "to take any measures in its power to ensure that the case concerning Ms. Chowdhury's complaint of anti-union discrimination is concluded without further delay and to take all the necessary measures to ensure that the procedures of examination of complaints of anti-union discrimination are prompt and impartial and considered as such by the parties concerned."[13] According to the Complainants, these issues remain unresolved by the Government of Bangladesh.

14. The Complainants assert that Telenor, as the majority owner of GP, has not exercised adequate parent oversight with respect to its subsidiary's non-compliance with domestic law and international labour standards. They allege that Telenor has not fulfilled its human rights due diligence expectations nor used its leverage with GP in accordance with the Guidelines. The Complainants maintain that despite "concerns raised as early as 2012, including formal communications from ITUC, it is alleged that no step was taken to effectively assess, prevent, or mitigate these impacts. The persistence of these labour-

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[10] The complaint (9 February 2026) p. 9.
[11] Bangladesh Labour Act, 2006, Ch XV Workers participation in companies' profit
Recom: "The Workers Profit Participation Fund (WPPF) is a fund set up by an employer to share a portion of the company's profits with the workers. It's a way of rewarding employees for their contribution to the company's success." – Provident Fund, Gratuity Fund, and WPPF: Differences
[12] Complainants' submission (10 April 2026) p. 7.
[13] ILO CFA 2024 Reports of the Committee on Freedom of Association, para. 205.

related disputes over an extended period suggests significant gaps in the effectiveness of the enterprise's preventive and corrective measures."[14]

15. The complainants allege that GP was informed about the formation of the union by email on 4 July 2012 from the Union General Secretary.[15] In a letter of 26 July 2012 to Telenor Group, ITUC expressed its concern about the manner in which GP's retrenchment plan had been carried out and urged Telenor and GP to desist from further anti-union activities.[16]

16. The complaint refers to Chapter II (Concepts and Principles), Chapter IV (Human Rights) and Chapter V (Employment and Industrial Relations) of the Guidelines without reference to specific provisions.[17]

17. The Complainants state that GP is exploiting the judicial delay of the local justice system and that all domestic avenues for remedy have failed. The Complainants view the NCP as the only remaining viable path to ensure that Telenor is held accountable for its obligations under the Guidelines. If the NCP decides that the complaint warrants further examination, the Complainants seek the following outcome of the process:

    a) Remediation of the 2012 disputes, including consideration of reinstatement or appropriate compensation for the 21 complainants
    b) Restitution of WPPF entitlements through a time-bound framework
    c) Strategic policy and compliance improvements with a formal mediated agreement with Telenor ensuring that legal and regulatory processes under the Bangladesh Labour Act 2006 are applied in a manner consistent with access to remedy and internationally recognised labour standards.[18]

2. The enterprise's response

18. Telenor submitted its response to the complaint on 18 March 2026 and submitted further comments on 29 May 2026 in response to the NCP's follow-up queries.

19. Telenor asserts that the issues put forward in the complaint do not merit further consideration, mainly due to the ongoing parallel proceedings and inadequately substantiated claims against Telenor. However, Telenor underlines that the company is committed to responsible business conduct, including in its operations in Bangladesh, and is

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[14] Submission from the Complainants (10 April 2026), p. 3.
[15] Copy of email submitted by the Complainants.
[16] ITUC (26 July 2012) Letter to Jon Fredrik Basaas, Telenor Group, and Tore Johnsen, GP
[17] In the submission of 10 April, the Complainants refer to the following provisions: Ch. I, para. 2; Ch. II General Policies, paras. A.10 and A.12 and Commentary paras. 14 and 15; Ch. IV, Commentary paras. 44 and 46; Ch. V, Commentary para. 54; and Procedural Guidance, Commentary para. 26.
[18] Submission from the Complainants (10 April 2026), p. 10-11.

willing to engage constructively with the NCP if the NCP chooses to accept the case for further consideration.

20. Telenor states that the complaint includes factual errors with respect to the terminations of employees in 2012 allegedly due to their involvement in the formation of a trade union. According to Telenor, the terminations were part of a transformative initiative undertaken by GP the first six months of 2012, as a result of changing business requirements in the industry.

21. Telenor contends that GP, prior to the terminations of the Complainants' employment, had not received a notification of a trade union registration application from the Department of Labour, as required by the Labour Act, nor from the relevant union member(s). According to Telenor, GP did not have information of the application before the terminations on 24 July 2012.

22. Telenor is of the view that "the suggestion that the Complainants' employment was terminated as a result of their union registration is unfounded on the basis that:

    a) Their employment was terminated as part of a fair and transparent transformation initiative involving written assessments and interviews [..];
    b) The Complainants were told prior to 10 July 2012 (at the latest) of the outcome of the assessment process and that their employment with GP would be terminated. This was well before they allegedly filed their union registration application on 23 July; and
    c) GP was not informed of the alleged application to form (or join) a trade union and as a result could not have terminated their employment on that basis, as alleged."[19]

    Furthermore, Telenor asserts that whether the application was filed on 23 July 2012 is a disputed question of fact which is part of the court proceedings.[20]

23. With respect to the duration of the legal proceedings in Bangladesh, Telenor acknowledges that systematic delays are a prevalent feature of the judicial system in Bangladesh and that it is unfortunate that civil litigation takes a long time for adjudication. However, Telenor denies that Telenor or GP have taken any steps to deliberately prolong or delay the process.

24. Concerning allegations of bad faith in the ADR process in 2022, Telenor states that GP denies this and argues that the company spent significant time and effort trying to resolve the issues.

[19] Telenor response (29 May 2026) para. 14, p. 3.
[20] Telenor response (29 May 2026) para. 13, p. 3.

25. Concerning the issue of unpaid dues related to the WPPF, Telenor underlines that it is entirely separate from the individual termination claim and that this issue is also sub-judice in Bangladesh. Telenor refers to a statement by GP on this matter.[21]

26. Regarding Telenor's due diligence processes, the company asserts that it was "neither part of, nor informed about, any discussions regarding the termination of the Complainants' employment".[22] Telenor states that the company was informed about the process and that the contracts of 162 GP employees had been terminated through its members on the board of GP during a board meeting on 10 September 2012.[23]

27. Telenor emphasizes that the company since 2016 has been engaging with the establishment of GPEU, which is a member of the global trade union organization UNI Global Union and with which the company has an international framework agreement since 2013 (renewed in 2020). Telenor states it has ongoing engagement with GPEU and UNI Global Union involving broader labour-related discussions than the Complainants' claim.

28. With respect to the Complainants' representation, Telenor argues that under the Bangladesh Labour Act 2006, the Complainants are not members of GPEU due to the termination of their employment which was confirmed by the High Court on 23 July 2025. The decision is appealed and is currently pending. Telenor concludes that the Complainants are not representatives of GPEU and not in position to complain on behalf of the union members.

29. Concerning the long-lasting litigation processes, Telenor states that the company is not in a position to "speed up" legal proceedings in Bangladesh or, as one of several shareholders in a listed company, to mandate amicable solutions. However, Telenor underlines that it has supported the pursuit of this, such as through the ADR process.

30. Telenor finds that the issues put forward in the complaint do not merit further consideration. The company argues that allegations against Telenor are not sufficiently substantiated and that the company 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. Telenor asserts that the Bangladeshi courts are the appropriate forum for the issues raised. An NCP process would risk duplication with ongoing domestic court proceedings and the ILO process and would not contribute to the effectiveness of the Guidelines.

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[21] Grameenphone (8 October 2025) Statement on WPPF Dispute (2010–2012)
[22] Telenor's response (29 May 2026), para. 22, p. 4.
[23] Ibid, para. 24, p. 5.

3. The proceedings of the NCP to date

31. The complaint was received on 9 February 2026 and shared with Telenor on 17 February with an invitation to comment on the issues put forward by the Complainants. The company's response was submitted on 18 March 2026. The NCP requested further information from the Complainants to substantiate allegations against Telenor on 27 March, which were received on 10 April. The NCP also requested clarifications on representation from the Complainants, which were received on 29 April. The submissions were shared with Telenor, which requested time to comment on the NCP's follow-up queries to Telenor. Telenor's responses were submitted on 29 May. Submissions from the parties have been shared with the other party.

32. Upon receipt of a complaint, the NCP determines whether any NCP members or secretariat staff have conflicts of interest that prevent them from participating in handling the case, in line with the case-handling procedures. NCP member Anita Househam was found to have a conflict of interest and was therefore replaced by Nina Schefte. NCP members Frode Elgesem, Carin Leffler and Liv Tørres together with Nina Schefte have handled this case.

Date	**Communication**
9 Feb 2026	Complaint submitted to NCP Norway
16 Feb 2026	Further information from Complainants with timeline for incidents related to complaint
17 Feb 2026	Complaint shared with Telenor
18 March 2026	Telenor's response to complaint
24 March 2026	Complainants' comments on Telenor's response
27 March 2026	NCP requesting Complainants to substantiate allegations against Telenor
10 April 2026	Response from Complainants to NCP's request of 27 March
16 April 2026	Information from Complainants on ILO process
17 April 2026	Information from Complainants with overview of protests in 2026
20 April 2026	Telenor requesting time to comment on the complaint, accepted by the NCP with deadline 29 May
29 April 2026	NCP requesting further clarifications from Complainants
29 April 2026	Response from Complainants to NCP's request of 29 April

8 May 2026	Information meeting on Teams between NCP and Telenor
29 May 2026	Comments from Telenor on information from Complainants
9 June 2026	Comments from Complainants on Telenor's submission of 29 May
12 June 2026	Comments from Complainants on GP's narrative of the trade union formation
28 July 2026	Update from Complainants on WPPF process

4. Initial assessment by the NCP

33. The Guidelines are recommendations from governments to multinational enterprises operating in or from countries adhering to the Guidelines. They are addressed to all the entities within a multinational enterprise (parent companies and/or daughter/local entities). According to the Guidelines, issues should primarily be dealt with by the NCP of the country in which the issues have arisen. As Bangladesh is not an adherent to the Guidelines and the parent company is based in Norway, the Norwegian NCP deems that it is the correct entity to handle the submission.

34. NCP Norway has determined that parts of the submission warrant further consideration. This decision has been taken following the elaboration of the six criteria below, as outlined in the commentary to the Guidelines' Procedural Guidance, paragraph 33, and the NCP's case-handling procedures.[24]

4.1. What is the identity of the party concerned and its interest in the matter?

35. The Complainants were employees of GP in 2012 and sought to form GPEU, a labour organization representing employees of GP, the same year. The two contact persons of the complaint were part of the GPEU leadership who filed for union registration on 23 July 2012.

36. The NCP is of the opinion that the Complainants have a legitimate interest in the issues raised and that there is a link between the issues raised in the submission and Telenor, through its subsidiary GP. Based on this, it is not necessary for the NCP to decide at this stage whether the individual complainants are the proper legal representatives of the union according to local law. This issue may be revisited, however, at a later stage, especially if mediation results in an agreement.

[24] NCP Norway (2025) Case-handling procedures

4.2. Are the issues raised material and substantiated?

37. In determining whether issues raised are "material and substantiated" the NCP has, based on the information submitted, taken into account whether they are relevant to the implementation of the Guidelines and are supported by sufficient and credible information.[25] The assessment at this stage is initial, and the question is whether the issues raised are material and substantiated to the extent that they warrant further examination with a view to facilitating dialogue between the parties.

38. The Complainants refer to chapters II (General Policies), IV (Human Rights) and V (Employment and Industrial Relations) without specifying provisions. In the submission of 10 April, the Complainants refer to several paragraphs and commentaries listed in footnote 17.

39. The Complainants claim that Telenor has not conducted adequate parent company oversight and due diligence to identify, prevent and mitigate adverse impacts caused by its subsidiary GP and not used its leverage to influence GP to prevent or mitigate such impacts. The issues concern freedom of association and the right to organise related to terminations allegedly resulting from the Complainants' involvement in the formation of a trade union, prolonged court proceedings and access to remedy, as well as the alleged right to statutory entitlements under the WPPF.

40. The NCP considers that the issues raised are material and sufficiently substantiated for the purpose of an initial assessment in so far as it concerns infringement of the freedom of association and the right to organise related to terminations in 2012 allegedly resulting from the Complainants' involvement in the formation of a trade union, the prolonged court proceedings and ensuing alleged denial of the complainants' right to an effective remedy.

41. The NCP does not pronounce any view on the substance of the claim regarding unpaid WPPF dues, since this issue is nevertheless not accepted for other reasons, see paragraph 50 below.

4.3. Is the enterprise covered by the Guidelines?

42. Telenor is a multinational enterprise based in Norway with subsidiaries in several countries, including GP in Bangladesh. The NCP considers that Telenor is covered by the Guidelines.

4.4. Is there a link between the activities of the enterprise(s) and the issues raised?

43. Telenor is the majority owner of GP. Thus, the NCP considers that there is a link between Telenor and the issues raised in the complaint through its business relationship with GP.

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[25] OECD (2023) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, p. 70.

4.5. Do applicable law and/or parallel proceedings limit the NCP's ability to contribute to the resolution of the issue and/or the implementation of the Guidelines?

44. Matters covered by the Guidelines may be the subject of domestic law and international commitments. The recommendation that enterprises observe the Guidelines is distinct from matters of legal liability and enforcement. Parallel proceedings that are underway or available to the parties, do not preclude the NCP from offering good offices to the parties. The NCP has assessed whether offering good offices could positively contribute to resolving the issue and/or implementing the Guidelines going forward and would not create serious prejudice for either party involved or cause a contempt of court situation.[26]

45. The NCP has been informed about three main parallel proceedings: two ongoing court proceedings related to the terminations in 2012 and entitlements under the WPPF respectively and the formal complaint with the ILO Committee on Freedom of Association (CFA) through ITUC.

46. The ILO CFA gives recommendations to governments and not to companies. The duration of the court proceedings, as a barrier to resolution and remediation, is part of the issues put forward by the Complainants. The NCP does not find that the parallel proceedings will limit the NCP's ability to contribute to the resolution of the issue and/or the implementation of the Guidelines.

47. The GPEU's 2012 Vice-President and its Communications Secretary also filed criminal cases the same year against the top management in Telenor ASA and GP Ltd, CEO Tore Johnsen and CEO Haroon Bhatti respectively. According to the Complainants, Johnsen and Bhatti were granted bail and fled the country. The criminal case has since then been frozen through a Stay Order from the High Court.

48. The NCP underscores that the current specific instance concerns the responsibilities of Telenor according to the Guidelines, and not the legal issues that is pending before the Bangladeshi courts. Even though GP's handling of the issues is part of the context, the case before the NCP – as it is delimited in this initial assessment – does not improperly interfere with the ongoing court proceedings and raises issues beyond the legal dispute. Accordingly, the ongoing procedures do not preclude the NCP from partially accepting the complaint, and, as the NCP concludes in paragraph 51 below, the NCP process may positively contribute to solution of issues raised in the specific instance.

[26] OECD Guidelines, Commentary on the Procedures for NCPs, para. 35.

4.6. Would the examination of the issue(s) contribute to the purpose and the effectiveness of the Guidelines?

49. The aim of the Guidelines is twofold: To encourage the positive contributions enterprises can make to economic, environmental and social progress, and to minimize the adverse impacts on the matters covered by the Guidelines that may be associated with an enterprise's operations, products and services.

50. As regards the complaint regarding nonpayment of dues from the WPPF, the NCP refers to the account given by GP, see footnote 21 above. It seems that the dispute is limited to a claim for interest on payments already made for 2010-2012. The resolution of this issue depends heavily on the interpretation and application of Bangladeshi law. The NCP is not well situated to do so, and the issue must ultimately be resolved through the ongoing court proceedings in Bangladesh. The NCP finds that it will not further the purpose nor the effectiveness of the Guidelines to accept this part of the complaint. The NCP thus finds that this part of the complaint does not merit further consideration.

51. However, the complaint is accepted insofar as it concerns the expectation according to the Guidelines that a parent company carry out due diligence and use its leverage to mitigate potential adverse impacts arising from alleged anti-union activities by its subsidiary and delays in court proceedings that may impede the Complainants' access to an effective remedy. In Bangladesh, the rights to organise and freedom of association are enshrined in the Constitution, but there is no guarantee of enforcement.[27] In this situation, the NCP process may positively contribute to solution of the issues raised in the specific instance.

52. The NCP is of the view that accepting this submission and offering good offices to the parties may contribute to the purpose and the effectiveness of the Guidelines, also for other reasons. The specific instance provides an opportunity to examine the responsibility of a multinational enterprise and majority owner with respect to its subsidiary's alleged anti-union activities and possible denial of the right to access to an effective remedy in this respect. Both Telenor and the Complainants, as well as unions and other stakeholders, may benefit from greater clarity on these issues.

5. Conclusion

53. The NCP has considered the above criteria for the initial assessment process and has determined that the issues raised in the complaint concerning Telenor's responsibility according to the Guidelines to carry out due diligence and use leverage to mitigate potential adverse impacts in relation to terminations in 2012 allegedly resulting from the Complainants' involvement in the formation of a trade union, the prolonged court

[27] ITUC Global Rights Index (2026) Bangladesh - International Trade Union Confederation

proceedings and ensuing alleged denial of the Complainants' right to an effective remedy, warrant further consideration. The NCP will offer its good offices to the parties.

54. If the dialogue has not succeeded within six months after it commences, the NCP will carry out a new assessment of whether further dialogue and consideration is still appropriate.

55. The NCP's conclusion in this initial assessment is based on the information received from both parties. The NCP has not hereby expressed any view as to the correctness of statements or the validity of the documentation provided, nor on their possible impact on the issues raised in the specific instance. The NCP has made no determination as to whether the company in this specific instance has observed the recommendations of the Guidelines.