

Nokia Group Human Rights Policy

Q&A

What does respecting human rights mean to Nokia?

As a provider of technologies and services that fuel our information society, we have defined the mission of our company as expanding the human possibilities of the connected world. To do this, we are committed to ensuring that our technologies and services are used to respect, and not infringe, human rights.

Nokia complies with applicable laws and is committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact.

We believe access to internet is certainly a fundamental need today and in line with the United Nations' stance, it is a basic human right as it facilitates the realization of a range of other human rights. We provide products and services that expand opportunities to communicate and contribute directly to the exercise of such fundamental rights as free expression and political participation. We do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights.

We have a fundamental responsibility to provide decent working conditions and to treat our people fairly. Our Code of Conduct sets the standard for labor conditions, and we have a comprehensive set of global human resources policies in place that ensure fair employment. We follow the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Our global employment policies are aligned with recognized industry frameworks such as the [SA8000](#) Standard. We have a strict policy against using child labor and related processes designed to ensure that no one below the legal working age is hired in our business.

Nokia expect its suppliers and business partners to share these values. Nokia seeks to ensure that materials used in our products come from socially and environmentally responsible sources. We validate that the minerals and metals used in our products do not contribute to conflict.

Nokia earns the trust of its customers and regulators through a commitment to promote ethical behavior and human rights as expressed in our Code of Conduct. The Code is supplemented with 14 policy risk area statements including Fair employment and Human Rights.

The Code of Conduct is available on our website at company.nokia.com/en/about-us/corporate-governance/nokia-code-of-conduct.

You have recently updated your Human Rights policy. Why now, and what exactly has changed?

Nokia provides products and services that expand opportunities to communicate and contribute directly to economic development and the exercise of such fundamental rights as free expression, access to information and the exchange of ideas. We remain focused on ensuring that our technology is both designed to do good, and is used to do good.

As our company has been transformed by the acquisition and integration of Alcatel-Lucent, we have taken the opportunity to review our corporate policies to ensure they fully reflect the world we live in. Nokia recognizes that there is a tension in today's world between the right to privacy and security; between legitimate actions to ensure citizens are protected from the threat of terrorism and other crime, while protecting or securing their fundamental human rights, including the right to privacy and freedom of expression and assembly. In connection with our overall policy review, we wanted to clarify our approach on topics such as lawful interception and pursuing business with intelligence agencies, and keep our external audiences informed.

What is your policy on Human Rights?

While our overall human rights approach is outlined in more detail in our [Code of Conduct](#), our Human Rights Policy focuses on issues related to freedom of expression and the right to privacy.

The Nokia Human Rights Policy articulates our commitment to respecting human rights and reinforces our commitment to due diligence in this area across our businesses.

Key takeaways from the new policy:

We will:

1. Provide passive lawful interception capabilities to customers who have a legal obligation to provide such capabilities.
2. Provide communication systems and standard networking capabilities to governmental customers for purposes such as public safety, railway communications, and smart city enablement.
3. Strive to resolve possible conflicts between international human rights law and local legislation in a manner that best respects human rights.
4. Continue to call for increased transparency from governments related to their surveillance activities and for greater clarity about the laws and regulations related to these topics.

We will **not**:

1. Knowingly provide technology and/or services for the purpose of
 - a) limiting political discourse,
 - b) blocking legitimate forms of free speech,

- c) otherwise contributing to activities that are not consistent with internationally recognized human rights standards.
2. Engage in any activity relating to active surveillance technologies, such as storing or analyzing of intercepted data.
3. Pursue business with intelligence agencies or similar institutions.

In line with the policy, we conduct extensive risk assessments and human rights due diligence to mitigate the risk of potential misuse of our products.

Do you participate in Human Right Industry initiative?

We work with others in our industry to address Human rights issue. Nokia is a founding member of the [Telecommunications Industry Dialogue](#) (ID) Group.

Influenced by the UN Guiding Principles on Business and Human Rights, the Telecommunications Industry Dialogue Group has published guiding principles that specifically address the issues of privacy and freedom of expression as they relate to the telecommunications sector. The principles explore the interaction and boundaries between a government's duty to protect human rights and the corporate responsibility of telecommunications companies to respect these rights.

Nokia is the current Chair of the Telecommunications Industry Dialogue Group.

We are committed to implementing the guiding principles of the ID and to reporting annually on our progress while also externally assuring our implementation status. The report is included in the [Nokia People & Planet Report 2015](#).

In early 2016, Nokia also became an official observer member of the [Global Network Initiative](#), with the aim of becoming a full member in March 2017.

How do you make sure that your products are not used to infringe human rights?

We are focused on ensuring that our technology is both *designed* to do good, and is *used* to do good.

We never knowingly sell our products and services in cases where we believe there is a significant potential that those products or services could be used to infringe human rights. To assess such situations, Nokia conducts due diligence in the pre-sales process to help ensure that our products are used to enhance, and not infringe, human rights. We have as a part of this process, a senior-level internal review process that focuses on sales in countries that have been deemed as presenting a high human rights risk. We work with an independent consultant company Verisk Maplecroft that specializes in risk assessments in this area. They provide us with an annual vendor-specific country risk categorization index.

Is there a blacklist of countries you don't do business in?

Communications technology, and connectivity more broadly, directly improves the conditions for economic growth and increases human rights through enabling free expression. As an infrastructure provider, therefore, choosing not to provide any connectivity is a serious consideration, and we assess such situations individually. We never knowingly sell our products and services in cases where we believe there is a significant potential that those products or services could be used to infringe human rights.

What does lawful interception mean?

Lawful Interception (LI) is the name given to an internationally agreed-upon approach for law enforcement authorities to intercept communications running over networks in their jurisdiction. It is a principle noted in the constitution of the International Telecommunications Union; addressed in several resolutions of the Council of the European Union; and firmly embedded in transparent technical standards, including those set out by the European Telecommunications Standards Institute (ETSI) and the 3GPP (3rd Generation Partnership Project).

Governments in almost all nations, including the United States and the members of the European Union, require operators to deploy LI as a condition of their license to operate. As a result, LI capability is present in almost every telecommunications network in the world.

Do you provide interception capabilities to customers?

Nokia will provide passive lawful interception capabilities to customers who have a legal obligation to provide such capabilities. We will not, however, engage in any activity relating to active surveillance technologies, such as storing or analyzing of intercepted data.

Where has this product been deployed – in what countries is it now operating?

As said, governments in almost all nations, including the United States and the members of the European Union, require operators to deploy LI as a condition of their license to operate. As a result, passive LI capability is present in almost every telecommunications network in the world.

Doesn't lawful interception allow for mass surveillance?

LI capability can cover individuals or groups of people, but is "passive" in the sense that while the capability is there, you still need to provide instructions on what to intercept and where to send intercepted information. LI resides in the operator's network. A system typically known as a monitoring center is the "active" tool that provides those instructions and then receives, records and analyses the intercepted communications. Monitoring centers are typically not in

the operator's network. Nokia does not sell monitoring centers, having divested that part of its operations in 2009.

But to repeat, Nokia provides passive lawful interception capabilities to customers who have a legal obligation to provide such capabilities. We will not, however, engage in any activity relating to active surveillance technologies, such as storing or analyzing of intercepted data.

Do you pursue business with governmental entities?

Nokia will provide communication systems and standard networking capabilities to governmental customers for purposes such as public safety, railway communications, and smart city enablement. We will not, however, pursue business with intelligence agencies or similar institutions.

How is the increased threat of terrorism impacting your industry in areas including human rights?

Like others, we have seen the increased threat of terrorism and insecurity. Many countries around the world have suffered and continue to suffer at the hands of terrorism. As the threat of terrorism evolves, we continue to face the challenge of balancing privacy and human rights on the one hand, with security concerns on the other. There are no easy answers here, and the debate is evolving in different ways – there is no global consensus, nor is there always consensus even within individual countries. Hence, there is also no clear guidance for companies.

While this happens, we will continue to act in a way that is in keeping with our values and our Code of Conduct and will, in situations where conflict may exist between local law or its interpretation and the generally accepted international human rights standards, strive to resolve that conflict in a manner that best respects human rights.

Furthermore, we remain committed to active industry-level dialogue on issues related to the balance between the right to privacy, freedom of expression, and personal security as fundamental human rights.

As part of those efforts, we will continue to call for increased transparency from governments related to their surveillance activities, and for greater clarity about laws and regulations.