

NOKIA CONFLICT MINERALS REPORT FOR 2018

Introduction

Based on our reasonable country of origin inquiry, Nokia has reason to believe that certain of the Conflict Minerals¹ necessary to the functionality or production of our products may have originated in the Democratic Republic of the Congo or an adjoining country (the "Covered Countries") and may not have come from recycled or scrap sources. Accordingly, Nokia undertook due diligence measures on the source and chain of custody of these Conflict Minerals. In the design of our due diligence processes we have conformed to the internationally recognized due diligence framework provided by OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (OECD 2017) (the "OECD Due Diligence Guidance"). The details of this alignment of our conflict minerals due diligence process with the OECD Due Diligence Guidance are provided in Table 1 below.

May 30, 2019

 Table 1. OECD Due Diligence Guidance & related Nokia Due Diligence actions

OECD Due Diligence	Nokia Due Diligence Action
Guidance	
STEP 1 Establish strong com	unany management systems
STEP 1. Establish strong con	ipany management systems
Adopt, and clearly communicate to suppliers and the public, a company policy for the supply chain of minerals originating from conflict- affected and high-risk areas. This policy should incorporate the standards against which due diligence is to be conducted, consistent with the standards set forth in the model	Nokia has a policy which describes its respective commitment to conflict-free sourcing globally, including responsible and conflict-free sourcing through legitimate trade from conflict-affected and high risk areas and measures taken to reach that goal (referred to herein as the "Nokia Conflict Minerals Policy"). It also sets out a commitment to identify, assess, mitigate, and respond to risks.
supply chain policy in Annex II of OECD Due Diligence Guidance.	Nokia Conflict Minerals Policy has been communicated to suppliers when first released and thereafter in conjunction with the annual supply chain conflict minerals inquiry.
	The Nokia Conflict Minerals Policy is reviewed regularly and is publicly available on our website: http://company.nokia.com/en/sustainability/downloads
Structure internal management systems to support supply chain due diligence.	In order to support and oversee the implementation of the Policy, Nokia has set up a cross-functional Conflict Minerals Working Group that includes members with necessary competence from sourcing, operations, sustainability, legal, and reporting and government relations teams.
	The supply chain inquiry is carried out through the internal conflict- free sourcing deployment team in cooperation with a global network of sourcing managers, and the results are periodically reviewed with Sourcing and Quality leadership (Supply Quality Monthly Business Reviews and Dedicated Quality Reviews) and Corporate

¹ Columbite-tantalite (coltan) (or its derivative tantalum), cassiterite (or its derivative tin), gold and wolframite (or its derivative tungsten).

	Responsibility Council (cross-functional committee for sustainability governance composed of group responsibility management and senior leaders from business units).
Establish a system of controls and transparency over the mineral supply chain. This includes a chain of custody or a traceability system or the identification of upstream actors in the supply chain. This may be implemented through participation in industry-driven programs.	Nokia's system of controls and transparency is a combination of internal activities, work with direct suppliers and reliance on joint industry programs such as the Responsible Minerals Initiative (the "RMI") (formerly known as the Conflict-Free Sourcing Initiative ("CFSI"). As a RMI member company, Nokia is familiar with the rigor and development of the audit protocol that led to the RMI Responsible Minerals Assurance Process in accordance with an internationally accepted standard: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, 2nd Edition. Furthermore, the mutual recognition between the RMI Responsible Minerals Assurance Process audit and the Responsible Jewellery Council's Chain of Custody certification and London Bullion Market Association's Responsible Gold Programme establish these programs as internationally accepted industry standards.
	Nokia starts its reasonable country of origin inquiry by a scoping of its suppliers, for which the product data management system and spend data is used to determine which of the suppliers are relevant for the conflict minerals supply chain inquiry.
	In order to identify the smelters and refiners in our supply chain and country of origin data, Nokia conducts a supply chain survey using the RMI conflict minerals reporting template and reviews gathered information against that provided by RMI and its Responsible Minerals Assurance Process ("RMAP").
	RMI publishes a conflict-free smelter list, which is composed of mineral processing facilities that have been reviewed by an independent third-party audit to assess whether the facility employs policies, practices, and procedures to provide assurance that the material sourced is DRC conflict-free. RMI also provides country of origin data for members, which has been aggregated due to confidential business information concerns (which conforms to the OECD Guidance specified in Step 5). This is reasonable because the country of the material's origin is thoroughly examined in the audit process, even if the origin's more specific location is not published. Therefore, reliance on the aggregated country list constitutes a reasonable inquiry into the material's country of origin. The data on which we rely for certain statements in this conflict minerals report is obtained through our membership in the RMI.
Strengthen company engagement with suppliers. A conflict minerals policy should be incorporated into contracts and/or agreements with suppliers. Where possible, assist suppliers in building capacities with a view to improving due diligence performance.	Nokia's approach is to establish long-term relationships with suppliers, seek sustainable solutions, and work with suppliers to drive improvements. Nokia has incorporated the principles outlined in the Policy into Nokia Supplier Requirements which are part of Quality appendix to standard supplier agreements. Nokia reserves the right to assess its suppliers against its supplier requirements.
	Nokia provides support for suppliers in the form of detailed feedback on their conflict minerals reporting template, and corrective action plans were agreed as necessary. Nokia also encourages suppliers to participate in and support multi stakeholder forums and conflict- free sourcing initiatives. Nokia has also conducted several dedicated information sharing webinar sessions with suppliers to further explain our conflict minerals requirements.

Establish a company-level, or industry- wide, grievance mechanism as an early- warning risk-awareness system.	Concerns and violations of the Policy can be reported to Nokia through our official grievance channels: Email: <u>ethics@nokia.com</u> Online: <u>https://nokiaethics.alertline.com</u> Phone: <u>https://nokiaethics.alertline.com/clientInfo/7782/phone.pdf</u>
	regular sourcing channel or Conflict-Free Sourcing team email (conflict_free_sourcing.team@nokia.com) if they wish to seek guidance on the application of the Policy approach, or if they wish to report suspected abuse. They, and other external stakeholders, may also report problems or concerns to the Nokia ethics alert line. At the industry level, grievances can also be reported to RMI's Grievance Channel at: http://www.responsiblemineralsinitiative.org/responsible-minerals- assurance-process/grievance-mechanism/. Nokia receives a periodic overview of the grievance received by RMI and considers this under risk management.
STEP 2. Identify and assess r	isk in the supply chain
Identify and assess risks in their supply chain as recommended in the Supplements.	As a downstream company Nokia is many supply chain tiers away from mining activities and has no direct business relationship with mining activities or metal processing facilities and therefore, in order to conduct its reasonable country of origin inquiry, Nokia uses a combination of actions both individually with direct suppliers, as well as multilaterally with industry peers and other stakeholders.
	With direct suppliers, the primary means for conducting the reasonable country of origin inquiry survey through a supply chain using the standard industry conflict minerals reporting template (provided by RMI), with the aim of assessing the direct suppliers' due diligence activities and identifying processing facilities and countries of mineral origin. Nokia assesses risks by reviewing supplier templates to understand their due diligence activities and identified processing facilities and countries of origin, and whether the minerals originated from recycled or scrap sources. In order to improve data quality and completeness Nokia conducts several rounds of surveys with suppliers, provides feedback on supplier templates and agrees on corrective actions if necessary. Reminders are sent to non-responsive suppliers and an escalation process is enacted when there is slow progress on supplier side on improvements and meeting Nokia targets.
	Nokia continues the risk assessment by comparing smelter data provided by suppliers to information provided by the RMAP and online research in order to verify whether the smelters and refiners have been validated as conflict-free or not and to identify the countries of origin of the minerals.
STEP 3. Design and implement	nt a strategy to respond to identified risks
Report findings of the supply chain risk assessment to the designated senior management of the company.	In accordance with the Policy, the results of the annual supply chain inquiry and risks identified throughout the year are reported to Nokia's Head of Supply Quality, Product Procurement Leadership and Corporate Responsibility Council.
Devise and adopt a risk management plan	To minimize the risk of tin, tantalum, tungsten or gold present in our products contributing to conflict in the Covered Countries, we seek to conduct a reasonable country of origin inquiry on a regular basis,

	check and increase the number of validated smelters and refiners in our supply chain, approach smelters directly and consider other publicly available information about smelting operation and country of origin. As part of risk management with our direct suppliers, we provide them feedback on the quality of their conflict minerals due diligence information and ask clarifying questions and demand corrective actions where necessary. We have set up informational calls with selected suppliers to help build their capacity, and we encourage our suppliers to participate in industry activities in order to learn and contribute. We also conduct an audit program for the suppliers in higher risk countries, such as China on their due diligence process. When suppliers have identified in their conflict minerals survey that some of the minerals originate from the Covered Countries, we perform additional due diligence to find out as much as reasonably possible about the origins of the metals. This involves asking suppliers to identify the smelter or refiner that processed the material and checking whether it has been validated as conflict-free. We also liaise directly with smelters that have not yet been validated as conflict-free in order to request mineral origin information. As part of our risk management we aim to increase the portion of validated conflict-free smelters and refiners in our supply chain, with the aim of ultimately sourcing only from validated processing facilities
Implement the risk management plan, monitor and track performance of risk mitigation efforts and report back to designated senior management. This may be done in cooperation and/or consultation with local and central government authorities, upstream companies, international or civil society organizations and affected third- parties where the risk management plan is implemented and monitored in conflict-affected and high-risk areas.	Risk management plans, monitoring and performance tracking is done in close collaboration with sourcing and followed up by the cross-functional conflict minerals working group that oversees the implementation of the Policy. The results are reported to Sourcing category leaders and also back to Head of Supply Quality and Corporate Responsibility Council. Where risk incidents involve direct suppliers, we carry out risk management planning, monitoring and performance tracking through the sourcing managers' network. In cases where risk incidents do not result in corrective actions taken to our satisfaction, it can ultimately result in termination of the business relationship. In cases where our regular supply chain inquiry indicates that a given supplier is sourcing materials from the Covered Countries, we undertake additional risk management activities, such as checking the reported mine of origin against industry data and public sources of information, and follow-up of the status periodically.
Undertake additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances.	As necessary through the same steps as above.
STEP 4. Carry out indep	endent third-party audit of supply chain due
diligence at identified po	ints in the supply chain
Companies at identified points (as indicated in the Supplements) in the supply chain should have their due diligence practices audited by independent third parties. Such audits may be verified by an	As the origin of Conflict Minerals cannot be determined after the ores have been smelted or refined, smelters and refiners are in the best position to determine the country of origin. Thus, the most important point in the supply chain for a downstream company to have third-party conflict-free validation is the smelter or refiner level.

independent institutionalized mechanism.	For that purpose, we make use of the cross-industry conflict-free smelter listing of the RMAP. The RMAP has agreed on mutual cross-recognition of gold refiner audits with London Bullion Market Association ("LBMA") and Responsible Jewellery Council ("RJC"), and therefore refineries validated by those organizations are also considered to be conflict-free. Refineries validated by LBMA and RJC are reflected in the RMI (former CFSI) list of validated smelters and refiners. <u>http://www.conflictfreesourcing.org/conflict-freesmelter-refiner-lists/</u> We compare the aggregated smelter and refiner list of our supply chain against the validated smelter and refiner lists provided by the RMAP. We also take steps to encourage the non-validated smelters to enter into the program and start the process of validation through our direct outreach to smelters as well as through the respective working group at RMI (former CFSI).
STEP 5. Report on supply cha	in due diligence
Companies should publicly report on their supply chain due diligence policies and practices and may do so by expanding the scope of their sustainability, corporate social responsibility or annual reports to cover additional information on mineral supply chain due diligence.	Nokia reports publicly on its due diligence policies and practices in its Form SD and Conflict Minerals Report filed with the US Securities and Exchange Commission, its annual sustainability report (Nokia People and Planet report), and on its company website.

As a downstream company, our due diligence measures can provide only reasonable, not absolute, assurance regarding the source and chain of custody of the Conflict Minerals. Our due diligence process is based on the necessity of seeking data from our direct suppliers and the direct suppliers seeking data within their supply chain to identify the original sources of the Conflict Minerals. We also rely to a large extent on information provided by independent thirdparty audit programs. Such sources of information may yield inaccurate or incomplete information.

RESULTS OF THE NOKIA SUPPLY CHAIN INQUIRY FOR 2018

In order to conduct the reasonable country of origin inquiry, Nokia started by determining the suppliers to be in scope for the supply chain inquiry. The analysis of the material content information gathered for all products led us to conclude that small quantities of the four metals in question are present in practically all parts and components used to manufacture products in our business (such as integrated circuits, connectors, resistors, hardware assembly components, RF MW circuits and capacitors).

The product data management system was used to determine which of Nokia's suppliers are relevant for the conflict minerals supply chain inquiry. Suppliers being phased-out and products sourced from third parties and subsequently resold by Nokia without influence over the manufacturing or design of such products were not in scope. Further, Nokia applied a spend threshold to exclude from the scope the suppliers accounting for relatively insignificant procurement spend.

The number of suppliers in the original scope for Nokia was 1297. Of these, 268 suppliers were above the supplier spend threshold applied by Nokia, in the aggregate representing 98% of supplier spend in original scope. Nokia approached these suppliers with the conflict minerals inquiry. The remaining suppliers were under threshold level or were in the phase-out

process. The response rate for the suppliers surveyed was 100%. 13 of the suppliers surveyed did not supply materials containing Conflict Minerals.



Based on our due diligence efforts we found on a supplier level that, of the suppliers in scope:

- 100% of suppliers have adopted a conflict minerals policy (99% in 2017), 89% public and 11% not public.
- Suppliers tracing all smelters (per mineral): tantalum 93%, tin 95%, tungsten 94%, gold 95%.
 Suppliers with conflict-free status (per mineral, including conflict-free status of

respective reported smelters): tantalum 93%, tin 88%, tungsten 84%, gold 86%.



Figure 1: Supplier smelter identification completion and Conflict-Free Status

Suppliers sourcing from the Covered Countries: 251/255=98% (2017: 261 suppliers)

In total, we have identified 313 of the smelters:

- 82% of smelters have been validated by RMAP or mutually recognized programs (out of known smelters) (80% in 2017²): gold 70%, tantalum 100%, tin 90%, tungsten 93%.
- 84% of smelters have been validated by RMAP or mutually recognized programs or are active in the validation process (out of known smelters) (83% in 2017): gold 73%, tantalum 100%, tin 91%, tungsten 95%.
- 4% of the smelters who are currently not validated by RMAP or Active towards validation are either Recyclers, or where our due- diligence have shown there is no reason to believe they are sourcing from the Covered Countries and can be reasonably considered as conflict-free.

	Conformant	Active	No participation	Total
Tantalum	40	0	0	40
Iditalum	100%	0%	0%	40
Tin	73	1	7	01
	90%	1%	9%	01
Gold	105	4	41	150
Gold	70%	3%	27%	150
Tungston	39	1	2	42
rungsten	93%	2%	5%	42
Total	257	6	50	313
rotal	82%	2%	16%	100%

² The number of identified smelters decreased from 318 in 2017 to 313 in 2018.



Figure 2. Conflict-Free validation status of the 313 identified smelters

In support of supply chain transparency, we disclose in the tables below: the processing facilities we have identified through our due diligence process as having processed conflict minerals contained in the products manufactured by Nokia and in products for which Nokia has contracted with third parties to manufacture. The processing facilities (including smelters and refiners) are listed on an aggregated basis per metal and classified within three categories – "validated", "active", and "no public participation in validation program". Smelter validation status is based on Responsible Minerals Initiative data as of February 19, 2019.

Responsible Minerals Assurance Process (RMAP) or LBMA Conformant Processing Facilities

The smelters and refiners identified as part of our reasonable country of origin inquiry and validated as conformant according to RMAP protocol:

Metal	Smelter ID	Standard Smelter Name	Smelter Country
Gold	CID000015	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	CID000019	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	CID000035	Allgemeine Gold-und Silberscheideanstalt A.G.	GERMANY
Gold	CID000041	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Gold	CID000058	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	CID000077	Argor-Heraeus S.A.	SWITZERLAND
Gold	CID000082	Asahi Pretec Corp.	JAPAN
Gold	CID000090	Asaka Riken Co., Ltd.	JAPAN
Gold	CID000113	Aurubis AG	GERMANY
Gold	CID000128	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES
Gold	CID000157	Boliden AB	SWEDEN
Gold	CID000176	C. Hafner GmbH + Co. KG	GERMANY
Gold	CID000185	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	CID000189	Cendres + Metaux S.A.	SWITZERLAND
Gold	CID000233	Chimet S.p.A.	ITALY
Gold	CID000328	Daejin Indus Co., Ltd.	KOREA, REPUBLIC OF

Gold	CID000359	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	CID000362	DODUCO Contacts and Refining GmbH	GERMANY
Gold	CID000401	Dowa	JAPAN
Gold	CID000425	Eco-System Recycling Co., Ltd.	JAPAN
Gold	CID000493	OJSC Novosibirsk Refinery	RUSSIAN FEDERATION
Gold	CID000689	HeeSung Metal Ltd.	KOREA, REPUBLIC OF
Gold	CID000694	Heimerle + Meule GmbH	GERMANY
Gold	CID000707	Heraeus Metals Hong Kong Ltd.	CHINA
Gold	CID000711	Heraeus Precious Metals GmbH & Co. KG	GERMANY
Gold	CID000801	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	CID000807	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	CID000814	Istanbul Gold Refinery	TUBKFY
Gold	CID000823	Japan Mint	IAPAN
Gold	CID000855	liangyi Conner Co. Ltd	CHINA
Gold	CID000920	Asabi Refining LISA Inc	LINITED STATES OF AMERICA
Gold	CID000924	Asahi Refining Canada Ltd	
Gold	CID000924		
Cold	CID000923	JSC Gratelectionieu	
Gold	CID000937		
Gold		Kazzani	
		Kennecott Utan Copper LLC	UNITED STATES OF AMERICA
Gold		Kojima Chemicais Co., Ltd.	JAPAN
Gold	CID001029	Kyrgyzaltyn JSC	KYRGYZSIAN
Gold	CID001078	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
Gold	CID001113	Materion	UNITED STATES OF AMERICA
Gold	CID001119	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	CID001147	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	CID001149	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	CID001152	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	CID001153	Metalor Technologies S.A.	SWITZERLAND
Gold	CID001157	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	CID001161	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Gold	CID001188	Mitsubishi Materials Corporation	JAPAN
Gold	CID001193	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	CID001204	Moscow Special Alloys Processing Plant	RUSSIAN FEDERATION
Gold	CID001220	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	CID001259	Nihon Material Co., Ltd.	JAPAN
Gold	CID001325	Ohura Precious Metal Industry Co., Ltd.	JAPAN
		OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC	
Gold	CID001326	Krastsvetmet)	RUSSIAN FEDERATION
Gold	CID001352	PAMP S.A.	SWITZERLAND
Gold	CID001386	Prioksky Plant of Non-Ferrous Metals	RUSSIAN FEDERATION
Gold	CID001397	PT Aneka Tambang (Persero) Tbk	INDONESIA
Gold	CID001498	PX Precinox S.A.	SWITZERLAND
Gold	CID001512	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	CID001534	Royal Canadian Mint	CANADA
Gold	CID001555	Samduck Precious Metals	KOREA, REPUBLIC OF
Gold	CID001585	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	CID001622	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Gold	CID001736	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	CID001756	SOE Shvolkovsky Factory of Secondary Precious Metals	RUSSIAN FEDERATION
Gold	CID001761	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
	CID001798	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold			
Gold	CID001738	Tanaka Kikinzoku Kogyo K K	IAPAN
Gold Gold	CID001758 CID001875	Tanaka Kikinzoku Kogyo K.K. The Refinery of Shandong Gold Mining Co. 1td	CHINA
Gold Gold Gold	CID001758 CID001875 CID001916	Tanaka Kikinzoku Kogyo K.K. The Refinery of Shandong Gold Mining Co., Ltd.	CHINA
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Gold Gold Gold Gold Gold Gold Gold Gold	CID001738 CID001875 CID001916 CID001938 CID001955 CID001977 CID001980 CID001993	Tanaka Kikinzoku Kogyo K.K. The Refinery of Shandong Gold Mining Co., Ltd. Tokuriki Honten Co., Ltd. Torecom Umicore Brasil Ltda. Umicore S.A. Business Unit Precious Metals Refining United Precious Metal Refining, Inc.	JAPAN CHINA JAPAN KOREA, REPUBLIC OF BRAZIL BELGIUM UNITED STATES OF AMERICA
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Gold	CID002314	Umicore Precious Metals Thailand	THAILAND
Gold	CID002459	Geib Refining Corporation	UNITED STATES OF AMERICA
Gold	CID002509	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	CID002516	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	CID002560	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
Gold	CID002561	Emirates Gold DMCC	UNITED ARAB EMIRATES
Gold	CID002580	T.C.A S.p.A	ITALY
Gold	CID002582	REMONDIS PMR B.V.	NETHERLANDS
Gold	CID002605	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Gold	CID002606	Marsam Metals	BRAZIL
Gold	CID002761	SAAMP	FRANCE
Gold	CID002762	L'Orfebre S.A.	ANDORRA
Gold	CID002763	8853 S.p.A.	ITALY
Gold	CID002765	Italpreziosi	ITALY
Gold	CID002777	SAXONIA Edelmetalle GmbH	GERMANY
Gold	CID002778	WIELAND Edelmetalle GmbH	GERMANY
Gold	CID002779	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	AUSTRIA
Gold	CID002850	AU Traders and Refiners	SOUTH AFRICA
Gold	CID002918	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Gold	CID002919	Planta Recuperadora de Metales SpA	CHILE
Gold	CID002973	Safimet S.p.A	ITALY
Gold	CID003195	DS PRETECH Co., Ltd.	KOREA, REPUBLIC OF
Tantalum	CID000092	Asaka Riken Co., Ltd.	JAPAN
Tantalum	CID000211	Changsha South Tantalum Niobium Co., 1td	CHINA
Tantalum	CID000291	Guangdong Rising Rare Metals-FO Materials Ltd	CHINA
Tantalum	CID000251	Exotech Inc	
Tantalum	CID000450	EXClectro Materials Ltd	
Tantalum	CID000400	Guangdong Zhiyuan Now Material Co. Ltd	
Tantalum	CID000010	Juliang Lin Vin Nonferrous Metals Co., Ltd.	
Tantalum	CID000914	Juliang Julian Nomen ous Metals Co., Ltd.	
Tantalum	CID000917		
Tantalum	CID001076	LSIVI BIdSII S.A.	
Tantalum	CID001163		
Tantalum	CID001175	Mineracao Taboca S.A.	BRAZIL
Tantalum	CID001192	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Tantalum	CID001200	NPM Silmet AS	ESTONIA
Tantalum	CID001277	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
Tantalum	CID001508	QuantumClean	UNITED STATES OF AMERICA
-	000001500	RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum &	0.000
Tantalum	CID001522	Niobium Co., Ltd.	CHINA
Tantalum	CID001769	Solikamsk Magnesium Works OAU	RUSSIAN FEDERATION
Tantalum	CID001869	Taki Chemical Co., Ltd.	JAPAN
Tantalum	CID001891	l elex Metals	UNITED STATES OF AMERICA
Tantalum	CID001969	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Tantalum	CID002492	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	CID002504	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	CID002505	FIR Metals & Resource Ltd.	CHINA
Tantalum	CID002506	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	CID002508	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
Tantalum	CID002512	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	CID002539	KEMET Blue Metals	MEXICO
Tantalum	CID002544	H.C. Starck Co., Ltd.	THAILAND
Tantalum	CID002545	H.C. Starck Tantalum and Niobium GmbH	GERMANY
Tantalum	CID002547	H.C. Starck Hermsdorf GmbH	GERMANY
Tantalum	CID002548	H.C. Starck Inc.	UNITED STATES OF AMERICA
Tantalum	CID002549	H.C. Starck Ltd.	JAPAN
Tantalum	CID002550	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tantalum	CID002557	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	CID002558	Global Advanced Metals Aizu	JAPAN
Tantalum	CID002568	KEMET Blue Powder	UNITED STATES OF AMERICA
Tantalum	CID002707	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	CID002842	Jiangxi Tuohong New Raw Material	CHINA
			MACEDONIA. THE FORMER
	CID002847	Power Resources Ltd.	YUGOSLAV REPUBLIC OF
Tantalum			
Tantalum Tantalum	CID002047	Jiujiang Janny New Material Co., 1td	CHINA
Tantalum Tantalum Tin	CID002047 CID003191	Jiujiang Janny New Material Co., Ltd.	CHINA

Tin	CID000292	Alpha	UNITED STATES OF AMERICA
Tin	CID000306	CV Gita Pesona	INDONESIA
Tin	CID000309	PT Aries Kencana Sejahtera	INDONESIA
Tin	CID000313	PT Premium Tin Indonesia	INDONESIA
Tin	CID000315	CV United Smelting	INDONESIA
Tin	CID000402	Dowa	JAPAN
			BOLIVIA (PLURINATIONAL
Tin	CID000438	EM Vinto	STATE OF)
Tin	CID000468	Fenix Metals	POLAND
Tin	CID000538	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	CID000760	Huichang Jinshunda Tin Co., Ltd.	CHINA
Tin	CID000942	Gejiu Kai Meng Industry and Trade LLC	CHINA
Tin	CID001070	China Tin Group Co., Ltd.	CHINA
Tin	CID001105	Malaysia Smelting Corporation (MSC)	MALAYSIA
lin 	CID001142	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	CID001173	Mineracao Taboca S.A.	BRAZIL
lin 	CID001182	Minsur	PERU
Tin	CID001191	Mitsubishi Materiais Corporation	
Tin	CID001231	Jiangxi New Nanshan Technology Ltd.	
IIN	CID001314	O.M. Manufacturing (Thailand) Co., Ltd.	
Tin	CID001337	Operaciones Metalurgicas S A	ουτίνια (plukina hunal state of)
Tin	CID001337	PT Artha Cinta Langgang	
Tin	CID001399	PT Rahel Inti Perkasa	INDONESIA
Tin	CID001402	PT Babel Surva Alam Lestari	INDONESIA
Tin	CID001400	PT Bangka Tin Industry	
Tin	CID001413	PT Belitung Industri Sejahtera	INDONESIA
Tin	CID001421	PT Bukit Timah	
Tin	CID001434	PT DS Java Abadi	
Tin	CID001448	PT Karimun Mining	
Tin	CID001453	PT Mitra Stania Prima	INDONESIA
Tin	CID001457	PT Panca Mega Persada	INDONESIA
Tin	CID001458	PT Prima Timah Utama	INDONESIA
Tin	CID001460	PT Refined Bangka Tin	INDONESIA
Tin	CID001463	PT Sariwiguna Binasentosa	INDONESIA
Tin	CID001468	PT Stanindo Inti Perkasa	INDONESIA
Tin	CID001471	PT Sumber Jaya Indah	INDONESIA
Tin	CID001477	PT Timah Tbk Kundur	INDONESIA
Tin	CID001482	PT Timah Tbk Mentok	INDONESIA
Tin	CID001490	PT Tinindo Inter Nusa	INDONESIA
Tin	CID001493	PT Tommy Utama	INDONESIA
Tin	CID001539	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	CID001758	Soft Metais Ltda.	BRAZIL
Tin	CID001898	Thaisarco	THAILAND
Tin	CID001908	Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.	CHINA
Tin	CID002036	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	CID002158	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	CID002180	Yunnan Tin Company Limited	CHINA
Tin	CID002455	CV Venus Inti Perkasa	INDONESIA
Tin	CID002468	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	CID002478	PT Tirus Putra Mandiri	
Tin	CID002500	Melt Metais e Ligas S.A.	BRAZIL
Tin	CID002503	PTATD Makmur Mandiri Jaya	
Tin	CID002517	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	CID002530	PT Inti Stania Prima	INDONESIA
fin 	CID002570	CV Ayi Jaya	
Tin	CID002592	CV Dua Sekawan	INDONESIA
Tin	CID002593	Pri Kajenan Ariq	
Tin	CID002706	Kesing Industria e Comercio Ltda.	BRAZIL
Tin	CID002773	INIETAIIO BEIgium N.V.	BELGIUM
Tin	CID002774	INIETAIIO Spain S.L.U.	
1 IN Tin		PT Bangka Prima Tin	
Tin		PT Sukses Inti Makmur	
Tin		PT Nijang Jaya Wandiri	
lin	CID002835	Pi menara Cipta mulia	INDUNESIA

Tin	CID002844	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tin	CID002848	Gejiu Fengming Metallurgy Chemical Plant	CHINA
Tin	CID002849	Guanyang Guida Nonferrous Metal Smelting Plant	CHINA
Tin	CID002858	Modeltech Sdn Bhd	MALAYSIA
Tin	CID002870	PT Lautan Harmonis Sejahtera	INDONESIA
Tin	CID003116	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tin	CID003190	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	CID003205	PT Bangka Serumpun	INDONESIA
Tin	CID003325	Tin Technology & Refining	UNITED STATES OF AMERICA
Tungsten	CID000004	A.L.M.T. Corp.	JAPAN
Tungsten	CID000105	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	CID000218	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	CID000258	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	CID000499	Fujian Jinxin Tungsten Co., Ltd.	CHINA
Tungsten	CID000568	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
Tungsten	CID000766	Hunan Chenzhou Mining Co., Ltd.	CHINA
Tungsten	CID000769	Hunan Chunchang Nonferrous Metals Co., Ltd.	CHINA
Tungsten	CID000825	Japan New Metals Co., Ltd.	JAPAN
Tungsten	CID000875	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	CID000966	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	CID001889	Tejing (Vietnam) Tungsten Co., Ltd.	VIET NAM
Tungsten	CID002044	Wolfram Bergbau und Hutten AG	AUSTRIA
Tungsten	CID002082	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	CID002095	Xinhai Rendan Shaoguan Tungsten Co., Ltd.	CHINA
Tungsten	CID002315	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	CID002316	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	CID002317	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	CID002318	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	CID002319	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	CID002320	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	CID002321	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	CID002494	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	CID002513	Chenzhou Diamond Tungsten Products Co., Ltd.	CHINA
Tungsten	CID002541	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	CID002542	H.C. Starck Smelting GmbH & Co. KG	GERMANY
Tungsten	CID002543	Masan Tungsten Chemical LLC (MTC)	VIET NAM
Tungsten	CID002551	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	CID002579	Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji	CHINA
Tungsten	CID002589	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	CID002645	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
Tungsten	CID002649	Hydrometallurg, JSC	RUSSIAN FEDERATION
Tungsten	CID002724	Unecha Refractory metals plant	RUSSIAN FEDERATION
Tungsten	CID002815	South-East Nonferrous Metal Company Limited of Hengyang City	CHINA
Tungsten	CID002827	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Tungsten	CID002830	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
Tungsten	CID002833	ACL Metais Eireli	BRAZIL
Tungsten	CID002843	Woltech Korea Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	CID002845	Moliren Ltd.	RUSSIAN FEDERATION

The smelters and refiners identified as part of our reasonable country of origin inquiry and validated as conformant according to LBMA Good Delivery List.

Metal	Smelter ID	Standard Smelter Name	Smelter Country
Gold	CID000343	Daye Non-Ferrous Metals Mining Ltd.	CHINA
Gold	CID001236	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Gold	CID001909	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA

RMAP Participating Processing Facilities

Smelters and refiners identified as part of our reasonable country of origin inquiry and that have agreed to participate in the RMAP audit:

Metal	Smelter ID	Standard Smelter Name	Smelter Country
Gold	CID000264	Chugai Mining	JAPAN
Gold	CID002511	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	CID002863	Bangalore Refinery	INDIA
Gold	CID003189	NH Recytech Company	KOREA, REPUBLIC OF
Tin	CID000555	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
Tungsten	CID003182	Hunan Litian Tungsten Industry Co., Ltd.	CHINA

Processing facilities with no public participation in validation program

Together with our suppliers and industry cooperation, we will continue requesting participation in RMAP or an equivalent program:

Metal	Smelter ID	Standard Smelter Name	Smelter Country
Gold	CID000103	Atasay Kuyumculuk Sanayi Ve Ticaret A.S.	TURKEY
Gold	CID000180	Caridad	MEXICO
Gold	CID000197	Yunnan Conner Industry Co. Ltd	CHINA
Gold	CID000522	Refinery of Seemine Gold Co. Ltd	CHINA
Gold	CID000651	Guoda Safina High-Tech Environmental Refinery Co. 1td	CHINA
Gold	CID000671	Hangzhou Euchunijang Smelting Co. Ltd	CHINA
Gold		Hunan Chenzbou Mining Co. Ltd	CHINA
Gold	CID000773	Hunan Guivang vinxing Nonferrous Smelting Co. Ltd.	CHINA
Gold	CID000778	HwaSeong CLCO_LTD	
Gold	CID000927	ISC Ekaterinhurg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION
Gold	CID000956	Kazakhmys Smelting IIC	KAZAKHSTAN
Gold	CID001032	L'azurde Company For Jewelry	
Gold	CID001052	Linghao Gold Co. Ltd	CHINA
Gold	CID001058	Lingbao Jinyuan Tongbui Befinery Co. 1td	CHINA
Gold	CID001093	Luoyang Zijin Vinhui Gold Refinery Co., Ltd.	CHINA
Gold	CID001093	Ponglai Panggang Gold Industry Co., Ltd.	CHINA
Gold	CID001502	Sabin Motal Corn	
Gold	CID001540	Sabili Metal Corp.	
Gold	CID001502	Shandong Tianchong Biological Gold Industrial Co., 1td	
Gold	CID001019	Tangling Nonformus Matala Crown Co., Ltd.	CHINA
Gold	CID001947	Morris and Watson	
Gold	CID002282		
Gold	CID002290	SAFINA A.S.	
Gold		Guanguong Jinuing Gold Linnied	
Gold		Fidelity Printers and Renners Ltd.	
Gold	CID002525	Shahuong Humon Shletting Co., Ltu.	
Gold	CID002563	Kaloti Precious Metals	
Gold	CID002567	Sudan Gold Reinery	SUDAN
Gold			BELGIOW
Gold	CID002615	Abington Boldon Metals, U.C.	
Gold			UNITED STATES OF AMERICA
Gold	CID002852	GCC GUJTAT GOID CENTRE PVL. LTD.	
Gold	CID002853	Sal Refinery	
Gold	CID002854	Universal Precious Metals Refining Zampia	
Gold	CID002857	Modeltech San Bha	
Gold	CID002865	Kyshtym Copper-Electrolytic Plant ZAO	
Gold		Norms and Watson Gold Coast	
Gold			
GOID		Pease & curren	
Gold	CID003153	State Research Institute Center for Physical Sciences and Technology	
Gold	CID003185	African Gold Refinery	
Gold	CID003324	UG Refining, LLC	UNITED STATES OF AMERICA
l Tin	I CID000448	I Estanho de Rondonia S.A.	BRAZIL

		Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy	
Tin	CID002572	Joint Stock Company	VIET NAM
Tin	CID002573	Nghe Tinh Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	CID002574	Tuyen Quang Non-Ferrous Metals Joint Stock Company	VIET NAM
Tin	CID002703	An Vinh Joint Stock Mineral Processing Company	VIET NAM
Tin	CID002756	Super Ligas	BRAZIL
Tin	CID003208	Pongpipat Company Limited	MYANMAR
Tungsten	CID002313	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	CID002647	Jiangxi Dayu Longxintai Tungsten Co., Ltd.	CHINA

We have identified an additional 9 facilities that were reported as smelters by our suppliers but that we were not able to confirm as smelters or refiners based on industry or public sources of information, and will be reaching out to these facilities in 2019 to perform additional due diligence.

Reasonable Country of Origin Inquiry

In order to identify countries of origin, Nokia made use of Conflict Minerals templates provided by suppliers and aggregated country of origin information of smelters provided by RMI to its members. Based on these, the countries of origin of the Conflict Minerals in the Nokia supply chain may include:

The countries of origin for Gold may include: Argentina, Armenia, Azerbaijan, Australia, Benin, Bolivia (Plurinational State of), Botswana, Brazil, Burkina Faso, Canada, Chile, China, Colombia, Democratic Republic of the Congo (Kinshasa), Cyprus, Dominican Republic, Ecuador, Egypt, Eritrea, Ethiopia, Finland, Georgia, Ghana, Guatemala, Guinea, Guyana, Honduras, Indonesia, Iran, Ivory Coast, Kazakhstan, Kenya, Kyrgyzstan, Laos, Lebanon, Malaysia, Mali, Mauritania, Mauritius, Mexico, Mongolia, Morocco, Namibia, Nicaragua, Niger, Papua New Guinea, Peru, Philippines, Puerto Rico, Russian Federation, Saudi Arabia, Senegal, Slovakia, Solomon Islands, South Africa, Spain, Suriname, Swaziland, Sweden, Zambia, Zimbabwe, Tanzania, Thailand, Togo, Turkey, United States of America, Uruguay, Uzbekistan

The countries of origin for Tantalum may include: Australia, Austria, Bolivia (Plurinational State of), Brazil, Burundi, China, Colombia, Democratic Republic of the Congo (Kinshasa), Ethiopia, Guinea, India, Madagascar, Malaysia, Mozambique, Nigeria, Russian Federation, Rwanda, Sierra Leone, Thailand.

The countries of origin for Tin may include: Australia, Bolivia (Plurinational State of), Brazil, Burundi, China, Colombia, Democratic Republic of the Congo (Kinshasa), Guinea, Indonesia, Laos, Malaysia, Mongolia, Myanmar, Nigeria, Peru, Portugal, Russian Federation, Rwanda, Taiwan, Thailand, Uganda, United Kingdom, Venezuela.

The countries of origin for Tungsten may include: Australia, Bolivia, Brazil, Burundi, China, Colombia, Democratic Republic of the Congo (Kinshasa), Guinea, Indonesia, Laos, Malaysia, Mongolia, Myanmar, Nigeria, Peru, Russian Federation, Rwanda, Taiwan, Thailand, United Kingdom, United States of America.

Nokia supports seeking a sustainable solution to the issue of conflict minerals and aims to ensure responsible and conflict-free sourcing, thus supporting legitimate trade and positive development in the DRC and adjoining countries. Of Nokia's suppliers, 251 had reported smelters that process conflict minerals originating in one or more of the Covered Countries. Altogether 55 smelters in the consolidated smelter list (18% of identified smelters) were confirmed to process Conflict Minerals sourcing from the Covered Countries. As part of our due diligence, we have followed up with all such suppliers to verify whether the smelters that

sourced Conflict Minerals from Covered Countries are compliant smelters under the RMAP. 49 smelters were found to be conformant. 30 of these (10% of identified smelters) were sourcing from the DRC. We believe this is a positive development for the countries whose livelihood depends on these efforts continuing. For six of the smelters we cannot rule out that they source from the Covered Countries due to their geographic proximity, and we plan to take further due diligence efforts in 2019 with regard to those smelters.

Target for 2018	Progress in 2018
Further improving the quality and completeness of the conflict minerals due diligence data provided by our suppliers;	Further improvement of supplier information quality was observed during data evaluation and follow up. More suppliers provided information on product level, we reached 96% of traceability smelters and refineries in our supply chain. Quality and completeness of data was also assessed and verified as part of onsite Conflict Minerals audits that we conducted on our suppliers in China.
Engaging in further awareness raising and due diligence capability building efforts jointly in collaboration with relevant stakeholder forums and/or independently with our suppliers;	A number of webinars were conducted to suppliers with high or medium risk. In addition, two workshops were conducted in China. Direct feedback was provided to all of the suppliers in most of the cases in several rounds. Suppliers were also encouraged to participate in industry forums and collaboration.
Actively engaging with our supply chain to get more smelters validated as conflict-free through the third-party validation mechanisms available, with the aim of increasing the number of smelters on the list of RMAP compliant smelters;	Engagement was two-fold: on the supplier level directly with smelters and through the respective working group of Responsible Minerals Initiative. As a result 82% of smelters were validated as conflict-free, 2% actively engaged in industry validation process and 4% identified as low risk of sourcing from the Covered Countries.
Requesting suppliers to complete smelter mapping, and source over 90% of tin, tantalum, tungsten and gold from conflict- free smelters; and	In 2018, 100% of the smelters from which our suppliers sourced tantalum were conflict-free, for tungsten 93% of smelters were conflict-free and for tungsten 90%. For gold the target was not achieved (70%). Smelter mapping by our suppliers was completed at 96% on average.
Validating the due diligence efforts of our suppliers as part of overall supplier assessments.	Corporate Responsibility audits of our product suppliers included a checklist on conflict-free sourcing. In 2018 we also conducted 10 third-party audits focused on conflict-free sourcing.

Progress on Commitments made in 2018 Conflict Minerals Report

NOKIA COMMITMENTS FOR 2019:

In order to mitigate the risk that the conflict minerals contained in, and necessary to the functionality or production of, Nokia's products benefit armed groups, and to improve our conflict minerals due diligence efforts further in the coming year, we plan to concentrate on the following activities in 2019:

engaging in further awareness raising and due diligence capability building efforts jointly in collaboration with relevant stakeholder forums and/or independently with our suppliers;

actively engaging with our supply chain to get more smelters validated as conflictfree through the third-party validation mechanisms available, with the aim of increasing the number of smelters on the list of RMAP compliant smelters;

requesting suppliers to fully complete smelter mapping, and source tin, tantalum, tungsten and gold from conflict-free smelters only; and

validating the due diligence efforts of our suppliers as part of overall supplier assessments.

Statements relating to due diligence process improvement, as well as similar strategy and compliance process statements made in this conflict minerals report are forward-looking in nature and are based on Nokia's management's current expectations or beliefs. These forward-looking statements are not a guarantee of performance and are subject to a number of uncertainties and other factors (such as whether industry organizations and initiatives such as CSFI remain effective as a source of external support to us in the conflict minerals compliance process), which may be outside of Nokia's control and which could cause actual events to differ materially from those expressed or implied by the statements made herein.

Unless otherwise expressly stated herein, any documents, third party materials or references to websites are not incorporated by reference in, or considered to be a part of, this conflict minerals report.