

HR Framework

Nokia Global Human Resources Framework



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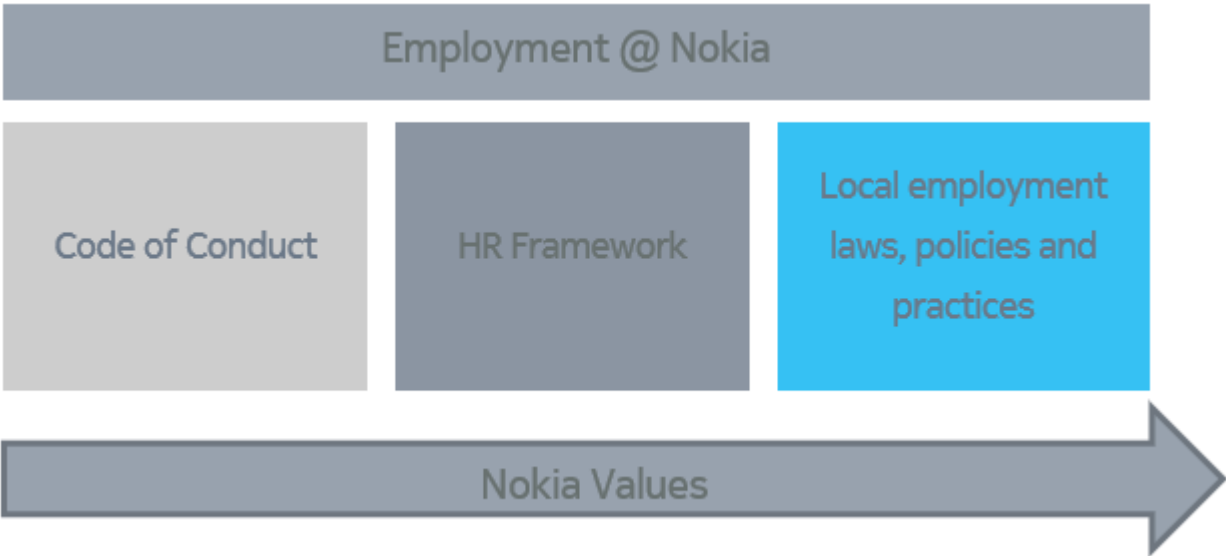
1 Purpose

At Nokia, we care about our customers and our people. We aim to hire and retain the best talent and provide a work environment where each person can develop their career within Nokia.

Our Code of Conduct and Values are the foundation of everything we do at Nokia. The purpose of Nokia’s Global HR Framework (the “Framework”) is to summarize the core HR principles applicable to everyone at Nokia – including directors, officers and employees, as well as all companies and controlled joint ventures that are part of the Nokia Group. It doesn’t cover external temporary workers, sub-contractors or employees working in service companies.

This Framework aims to provide a common understanding of our HR guiding principles and what they mean in practice. Further information is available on country specific rules based on applicable country legislation, collective agreements and practices at the relevant country HR intranet pages. Local laws and regulations take precedence in the event of a conflict with the Framework.

The picture below illustrates NOKIA’s HR guiding principles.



Within Nokia’s governance model this Framework is called a Policy, which governs all the Human Resources processes and practices.

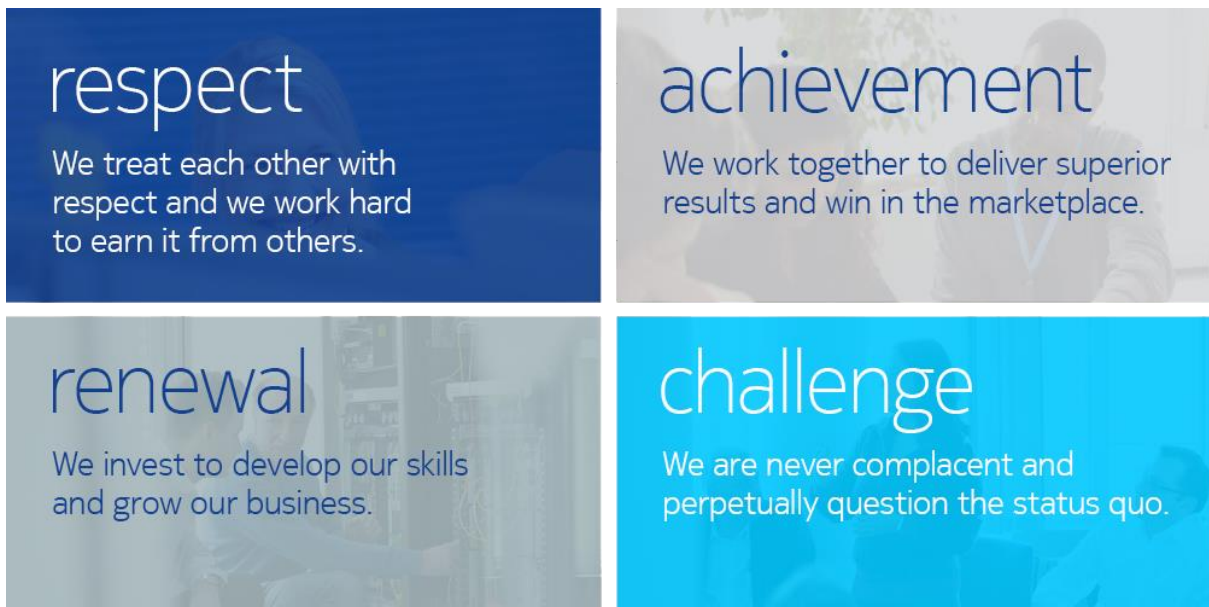
The formal and approved regulation for implementing Human Resources processes and practices is called a Standard Operating Procedure (SOP). All HR SOPs are global by definition – i.e. apply to all Businesses within Nokia. SOPs are developed and maintained by the Nokia Global HR Center of Expertise (CoE). The Head of the appropriate Portfolio for the given process or practice is the owner. Final approver is Nokia’s Global Head of Human Resources.

Business, Region or Country specific variations of any HR SOP are called HR Guidelines and are to be developed under and will be governed by the respective SOP.

All Human Resources SOP's and Guidelines are governed by and have to be in full alignment with this Framework. In case of conflict this Framework prevails.

2 Culture

We strongly believe that our values are the enablers for growth and business performance. They constitute a shared foundation which allows us to build one company, work together and make good decisions. They determine how we, both as a company and as individuals, treat each other and our external stakeholders. They are guiding principles for all our decision-making and how we interact with colleagues.



Common shared cultural principles and focus on Drive, Dare and Care is the cultural platform we use to shape Nokia's core common culture. It means relentlessly Driving for excellent results, have passion for good customer experiences and quality of products. We Dare to innovate, learn and challenge outdated practices. We have the attitude of entrepreneurs and we do not celebrate hierarchies. We Care for our colleagues, we care for quality and we put the Nokia team first.

3 Human Rights

Nokia is committed to observing high standards of honesty, integrity and ethical conduct in all its operations and our Code of Conduct is fundamental to how we do business.

Nokia is committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact, and we expect our suppliers and business partners to share these values. Nokia prohibits the use of servitude, child labor, forced labor, human trafficking or slavery in our own operations, or in any part of our global supply chain. Employment must always be voluntary, and employees are free to resign from the company at any time. Further, employees may not be required to lodge deposits or identity papers as condition to employment

Nokia supports active, open communication and dialogue with employees and/or employee representatives. Furthermore, consistent with our Values and Code of Conduct, all Nokia employees have a right to express their opinions. Employees are also free to join, not join or leave unions and associations of their own choice and select their representatives according to the local practices.

Further, Nokia views freedom of peaceful assembly and association, freedom of thought, conscience and religion and freedom of opinion and expression, as universal rights.

4 Reward & Recognition

Nokia aims to provide market competitive rewards to our employees worldwide through a performance driven, flexible and fair Compensation & Benefits framework. The key elements include a total compensation approach, pay according to relevant local market and differentiation based on business and individual performance as well as the skillset and experience of each role.

5 Fair Employment

5.1 Diversity & Inclusion

Nokia values all employees and wants everyone to bring their full self to work. Nokia cultivates a globally diverse workplace culture of respect across six continents. We are passionate about self-awareness, teamwork and collaboration, encouraging our employees to grow in each.

Nokia is committed to equality of opportunities in all its employment practices from the start through the lifecycle of employment at Nokia. No employee or candidate for employment will, therefore, receive less favorable treatment due to their race, creed, religion, color, nationality, ethnic origin, age, sex, sexual orientation, gender identity, characteristics or expression, marital status, connections with a national minority, disability, membership or non-membership of a trade union, or other protected classes. In addition, hiring decisions are not based on any pre-existing health conditions.

We also care about providing a safe environment where every person is treated in a fair and respectful way. Nokia considers harassment, victimization and bullying contrary to the Nokia values. Thus, all forms of harassment, whether racial, sexual, relating to disability, sexual orientation, identity or expression, physical or psychological, or any other attribute, are prohibited. We are passionate about collaboration and treating people with respect so any violent or disruptive behavior or language, including inappropriate jokes and gestures, is not acceptable at Nokia.

Additionally, Nokia provides a reasonable accommodation to qualified persons with disabilities to enable them to perform the essential functions of their job. For more information on equal opportunity in hiring and employment practices please refer to our Code of Conduct.

5.2 Performance Management

Nokia operates in a fast-paced and competitive industry where we need to be agile and deliver for our customers. We aim to provide a high-performance environment where all our employees have the opportunity for continuous development.

Nokia appreciates the commitment and hard work of our people and the contribution to the business. Typically, employees act consistently with Nokia's values and required standards of conduct and performance. However, if you don't meet these expectations, Nokia operates a global performance management process which includes a performance improvement plan if there is an issue regarding delivering in the role or your behaviors are not consistent with Nokia's values.

5.3 Disciplinary Practices

In the event there's a breach of Nokia's policies, statements, practices or binding public commitments that Nokia has made, and/or your conduct or behaviors do not meet Nokia's Values, disciplinary action may be taken up to and including exit from the company. Nokia's approach to disciplinary action is to ensure a fair and consistent treatment of all Nokia employees globally. This means that while local law and practices vary, at a minimum, employees will receive an oral and/or written warning regarding their conduct or behavior that is not meeting expectations except in serious cases of misconduct (such as a breach of Nokia's Code of Conduct or other policies) where summary termination may result.

5.4 Raising a concern/ HR grievance process

Nokia aims to create a workplace where all employees can enjoy a supportive and open relationship. We aim to resolve issues and concerns fairly and promptly and we have multiple channels to address Compliance concerns. For example, in case of HR concerns/grievances you may go to your line manager in the first instance or HR or to another manager. Many countries also have a country specific local grievance process to resolve HR issues but, at a minimum, Nokia expects all employees to be able to raise an issue internally and commits to take such issues seriously, investigate and resolve.

In case of any compliance concerns, you are encouraged to approach your local ombuds person or compliance person. We also have a confidential Ethics & Compliance Helpline.

5.5 Working/Personal Time

Nokia prides itself on taking a balanced approach to work and personal life and recognizes these are becoming blurred. We aim to have flexible start and finish times depending upon business/customer demands and the role you perform in the company. In addition, Nokia has a tele-working approach which provides some flexible working from home up if agreed with your line manager and subject to business needs and the job requirements.

At Nokia working time includes attending training programs and working at different locations. Typically, however, regulations regarding working time vary by country or may be site specific depending upon which part of the business you work in and the nature of your job. This includes working hours, overtime as well as rest breaks and travel time.

5.6 Confidentiality & Conflict of Interest

Nokia operates in a dynamic and highly competitive industry where innovation is happening all the time. Therefore, we must protect our business and make sure that company confidential information and intellectual property, irrespective in which form, does not end up in wrong hands.

Do not disclose any company confidential or proprietary information, unless properly authorized and provided that a proper non-disclosure agreement has been signed with the external party receiving the information. Disclosing company confidential information must always have a good business reason for doing so. Please also note that your confidentiality commitment continues even after the end of your employment with Nokia.

Further, if you have any outside interests or wish to get involved or invest in any start-up or other activity (such as becoming a trustee of a charity) please check with your line manager first. This also covers activities which could detract you from your job at Nokia (incl. relationships at work which can also influence your judgement when making decisions) or create potential reputational or other conflicts for Nokia.

5.7 Privacy

Nokia has a comprehensive privacy program including protection of employee data that we process for business purposes. We take seriously both the general data protection regulations and your individual privacy and right to a private life. Nokia has a robust privacy program and governance model, including proactive and reactive risk management, security and privacy engineering, training and assessments. Also, we limit access to our data bases containing personal data to authorized persons having a justified need to access such information. Nokia's Code of Conduct sets the standards of privacy compliance applicable to everyone at Nokia and all directors, officers and employees of Nokia are required to follow Nokia's Privacy Management Policy, Privacy Statements and data protection practices.

5.8 Health, Wellbeing and Safety

We promote wellbeing at work, both from a physical and mental perspective, by ensuring a good working environment in compliance with legal requirements so that the work demands and resources are in balance.

We aim to provide a healthy workplace which is drug, alcohol and other substance-free. For our customers and some regulators, we're required to ask employees to take certain tests (e.g. pregnancy, HIV and/or Hepatitis). In addition, given the global political environment we may be required to conduct regular background checks for employees due to regulatory and/or customer demands as well as to ensure the safety of all our employees.

5.9 Leave of Absence

Nokia encourages the health and well-being of its employees and recognizes that it is important for employees to have regular breaks from work. Nokia also recognizes that people may want to take some time off from work for medical or family issues, certain personal reasons, and/or to fulfill civic obligations, among other reasons.

Nokia provides paid time off for holiday for all employees to be taken in each calendar year. In addition, other types of leave such as maternity, paternity, parental, adoption, sick leave and bereavement are considered important.

For employees who wish to take a longer unpaid break from work (sabbatical), Nokia's global approach is to consider all requests between 3 and 6 months (after 4 years continuous employment) and 3 to 12 months (after 10 years continuous employment) subject to meeting business needs and local regulations regarding sabbaticals. Please note that any such unpaid leave of absence may not count towards your period of continuous service with Nokia (for example for end of service benefits).

5.10 Learning and Development

Renewal is one of the Nokia Values and enables us to achieve our business goals. Nokia supports learning and development by offering various learning solutions from instructor lead training courses to mentoring and job rotation. The starting point for finding the most suitable learning and development solutions should be Nokia's 1 in 90 process and our performance and talent management process where an employee's personal development plan is created.

5.11 End of employment

If an employee decides to leave Nokia, we want to make sure that the departure is conducted in a sensitive and professional manner, and in accordance with our philosophy of treating departing employees with dignity and respect.

To obtain feedback from leavers to support among other things our HR practices, the reasons for the employee's leaving should be established for example via an exit survey or an exit interview. Further,



employees should, as part of the exit discussions, also be asked whether they have any unresolved concerns about potential violations of law or company policy. If necessary, Line Managers should notify the Director of Ethics & Compliance Investigations immediately, or alternatively, enter the concern in the Ethics & Compliance Helpline.