

NOKIA

ONLINE NOTICE FOR THE HELPLINE

Nokia invites anyone who has knowledge of or concerns about unethical or illegal conduct to report such concerns to the company. To facilitate reporting, Nokia has established a number of reporting channels including this Business Ethics Helpline (the “**Helpline**”) which is provided by Nokia Corporation and its affiliates (“**Nokia**”, “**we**”, “**our**” “**us**”).

This Online Notice explains how we collect, use and disclose personal data in connection with the Helpline. Personal data means any information relating to an identified or identifiable individual that is processed via the Helpline.

This Online Notice also sets out the rights that apply to individuals based in the EU and in other countries. Rights and practices may vary among the countries in which we operate to reflect local practices and legal requirements.

Who can report

Generally, the Helpline is meant to be used by all individuals (including employees and non-employees of Nokia) who have knowledge of or concerns about unethical or illegal conduct.

Who can report in the EU

In the EU, the Helpline is meant to be used by individuals who have acquired information on law violations (as described below) in a work-related context (such as reports of violations provided by current and former employees, consultants, independent contractors, job applicants, suppliers, shareholders, volunteers, freelancers).

Concerns that may be reported

The Helpline may **generally be used** for reporting integrity concerns, including concerns relating to bribery, corruption, accounting (including internal accounting controls), auditing matters, banking, and financial crime.

In the EU, the Helpline may be used for reporting violations of EU law, including: public procurement, financial services, products and markets, prevention of money laundering and terrorist financing, product safety, public health, protection of the environment, consumer protection, violations affecting the financial interests of the EU or relating to the internal market (e.g., competition and State aid rules), radiation protection and nuclear safety, food safety, animal health and welfare, and protection of privacy, data protection and data security.

In addition to the above, in the countries below, reports may also relate to the following:

- In **Denmark**, you may also report about: matters which otherwise relate to serious offenses or other serious matters; and actions or omissions that make it possible to circumvent the purpose of the provisions of the Danish Whistleblowers Protection Act.
- In **Lithuania**, you may also report about: concerns related to a threat to public safety or health, to the life or health of a person; threat to the environment; obstructing or unduly influencing law enforcement investigations or the administration of justice; financing of illegal activities; illegal or non-transparent use of public funds or property; illegally acquired property; concealment of the consequences of a committed breach, including any obstructions to determining the extent of the consequences; and other breaches of law.

- In **Portugal**, you may also report about all crimes under Law No. 5/2002 of 11 January, which are: drug trafficking; human trafficking; terrorism, terrorist organizations, international terrorism and financing of terrorism; weapons trafficking; influence peddling / lobbying; active and passive corruption, both in public and private sectors and in the international trade; embezzlement; economic interest in a business; money laundering; criminal association; child pornography and solicitation; forgery; solicitation; smuggling; vehicle theft and trafficking; computer and software sabotage and damage; and illegitimate access to software.
- In **Sweden**, the Helpline may also be used to report violations of laws or other regulations covered by Chapter 8 of the Instrument of Government (Kungörelse (1974:152)), or information on misconduct in a work-related context which is of public interest (i.e., serious misconduct). Note that reports in Sweden cannot cover classified information under the Protective Security Act (2018:585) and information in the field of defense and national security.

Voluntary nature of the Helpline & anonymous reporting

The use of the Helpline is **voluntary**. You are encouraged to identify yourself when making reports to the Helpline; but, to the extent permitted by applicable law, you are not obligated to do so.

Helpline service provider

The website and telephone line through which you may report an incident are operated by i-Sight, established at 2255 Carling Ave., Suite 500 Ottawa, Ontario, Canada, K2B 7Z5, Nokia's independent service provider of the Helpline.

Collection of personal data & legal basis

Nokia may collect the following personal data through the Helpline: your name, title and contact details; the name and other data about individuals who are named in your report; a description of the conduct at issue in your report including the date and location, as well as other pertinent personal data; and any questions you may have. Nokia may also collect personal data from others (such as your colleagues) during any subsequent investigation.

The personal data provided by you will be treated confidentially.

Nokia may use the personal data mentioned above because we have to either comply with a legal obligation imposed on Nokia or we have a legitimate interest to investigate the report that you submitted to us.

Processing personal data and access to personal data

When you call the Helpline, a representative of i-Sight, the Helpline service provider noted above, will answer your call to the Helpline. **The call is not recorded**. The representative will ask you for several items of information, document your input, and ask follow-up questions to clarify information. Please note that the representative is not able to answer any questions about ethics or policy and cannot advise you on any course of action. If you choose to use the web reporting tool, the same information is captured electronically.

If you prefer, you can ask for a physical meeting to report your concern.

After the initial report or inquiry is made, a detailed record is prepared and sent by i-Sight directly to Nokia's Business Integrity Group ("BIG") within the Ethics & Compliance organization. Depending on

the nature of the matter, BIG may communicate the report and related documentation to appropriate personnel at Nokia who may need to be informed, such as representatives of Legal & Compliance, People, or Audit for further investigation and resolution. We might need additional information and clarifications from you as the investigation progresses, in which case we will contact you again. Where necessary, BIG may also need to notify members of People or Nokia's leaders of any finding of violation for purposes of determining any disciplinary action and for transparency purposes. The information may also be shared with Nokia's external advisers, such as lawyers and/or auditors and competent authorities such as regulators and/or the police. We will inform you about the progress of the investigation and the actions taken following the outcome of the investigation, consistent with our obligations under applicable law. Nokia aims to inform each person implicated in a report about the allegations against him or her within an appropriate time frame, but will seek not to disclose your identity to the extent possible. Implicated individuals will have the right to react to the information reported by you. Please note that the information you supply may result in decisions that affect individuals at Nokia and other third parties involved in the relevant incident. We therefore ask you to provide only information that, to the best of your knowledge, is accurate. Knowingly providing inaccurate or misleading information may result in disciplinary actions or even civil or criminal liability. Also, where possible, any report should be limited to facts that are relevant to the report and the follow-up investigation.

Retaliation against any Nokia individual who seeks advice, raises a concern, reports misconduct, or participates in an investigation in good faith is strictly prohibited. If someone retaliates against an individual who has truthfully and in good faith reported a violation, Nokia will take appropriate action — even if it later turns out that the individual was mistaken in reporting the matter originally. If you think that you, or anybody else involved, have been retaliated against, you should contact BIG or call the Helpline immediately.

Personal data use, retention, and data transfer

Nokia has contracted with i-Sight to protect the confidentiality and security of your personal data, and i-Sight is only permitted to use your personal data for the provision of the Helpline. Information we receive from i-Sight and any personal data that you provide to us will be stored in a Nokia database with limited access.

Beyond i-Sight, other transfers of personal data may take place to countries that have different data protection rules than are found in the country where you work, including to other Nokia affiliates or vendors, as required to investigate the report and administer the Helpline. Note that some of the non-EEA countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards. Countries that are recognized as providing an adequate level of protection are available [here](#).

We have put in place adequate measures, such as standard contractual clauses adopted by the European Commission, to protect your personal data that are transferred. You may obtain a copy of these measures by contacting us or our Group Data Protection Officer using the details set out in the "Contact Us" section below.

Personal data relating to a report made via the Helpline will be archived or deleted based on the following criteria: in accordance with any specific retention requirements imposed by applicable law; when the investigation has been closed and no further action is needed; when the time period for any relevant litigation has lapsed; and when our obligations for record keeping relating to investigations have lapsed.

Contact us

You may contact us or our Group Data Protection Officer at:

Nokia Corporation c/o Privacy
Karakaari 7
P.O. Box 226
FI-00045 Nokia Group
Finland

You may contact us by using the form available here - [Contact us](#) – and selecting “Privacy” as the relevant category for the question or feedback.

Please do not include credit card or other sensitive information in your email to us. Please only send sensitive personal data if we specifically request it.

Your rights

If you would like to request to access, correct, update, erase or restrict personal data, or object to its processing, you may contact us at by using the form available here - [Contact us](#) – and selecting “Privacy” as the relevant category for the question or feedback. We will respond to your request consistent with applicable law. If you would like to contact the Group Data Protection Officer, you can do so by using the link above or by using the contact details in the Contact Us section above. You also have the right at all times to lodge a complaint with a supervisory authority competent for your country or region. Questions about the Helpline also may be directed to the above address.

Additional rights under the EU whistleblowing rules

When a report is subject to the EU whistleblowing rules (i.e., Directive (EU) 2019/1937 on the protections of persons who report breaches of Union Law and its implementing laws in EU Member States), note that you may also have the right, under certain conditions, to report your concerns about violations of EU laws externally to competent authorities of EU Member States. We do, however, encourage you to first contact Nokia’s Chief Compliance Office, who will try to independently resolve your concerns about the effectiveness of the Helpline and subsequent investigation. You can view the list of applicable competent authorities [here](#).

Changes

We will update this notice from time to time. Any changes will be posted on this page with an updated revision date. If we make any material changes, we will provide notice through the Helpline or by other means.

Last updated March 9, 2022