

Modern Slavery statement for year 2021

NOIK





Slavery, servitude, forced labor, and human trafficking remain global concerns, and no industry or company can be considered immune to the different forms of modern slavery. Nokia does not tolerate, in any form or context, the use of servitude, forced or bonded labor, human trafficking, or slavery, in its operations in any region in which we operate, or in any part of our global supply chain.

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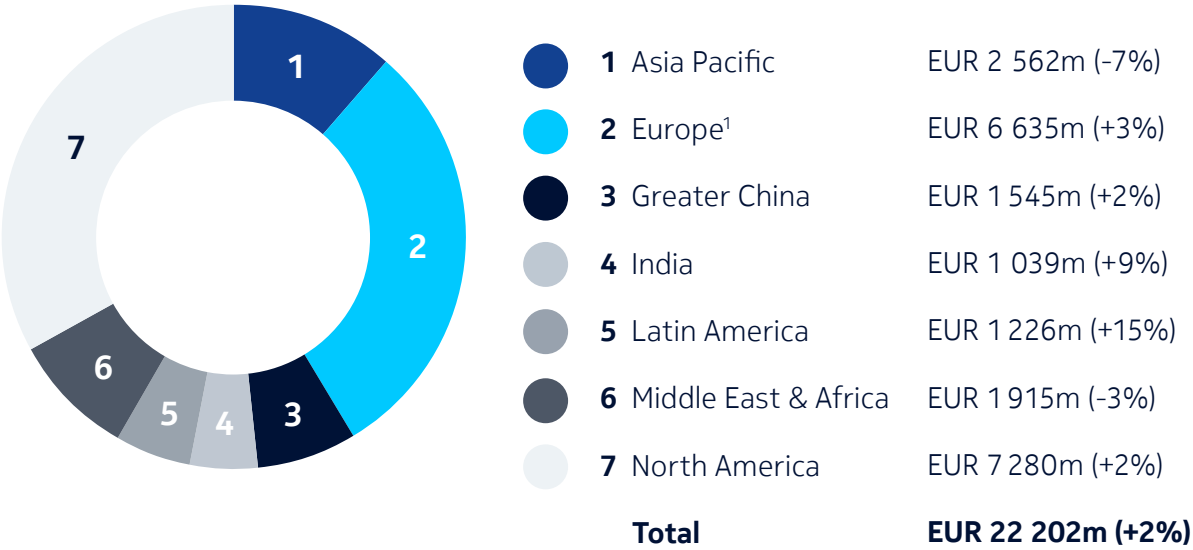
# Mapping our business and our supply chain

## 1.1 Business profile

At Nokia, we create technology that helps the world act together. As a trusted partner for critical networks, we are committed to innovation and technology leadership across mobile, fixed and cloud networks. We create value with intellectual property and long-term research, led by the award-winning Nokia Bell Labs. We adhere to the highest standards of integrity and security, and we help build the capabilities needed for a more productive, sustainable and inclusive world.

Our customers include communications service providers. We also provide solutions to enterprises in the private and public sector that use our network portfolio to increase productivity and enrich lives. From the beginning of 2021, we moved into a new operating model with four core business groups: Mobile Networks, Network Infrastructure, Cloud and Network Services, and Nokia Technologies. For more information see our financial report at [www.nokia.com/investors](http://www.nokia.com/investors)

Net sales by region 2021



The overwhelming majority of Nokia employees work in R&D, in the maintenance of network hardware and infrastructure, or in corporate roles including sales, legal, finance or other business support functions. Amongst other criteria, these roles require completing some form of higher education, and we therefore conclude the risk of encountering modern slavery in Nokia’s own operations is highly unlikely.

<sup>1</sup> All Nokia Technologies IPR and Licensing net sales are allocated to Finland.  
The figures are derived from our consolidated financial statements prepared in accordance with IFRS. Year-on-year change is in parenthesis.

1.2 Nokia supply chain profile

Identifying the part of supply chain most at risk

Our suppliers fall into four broad categories: hardware suppliers for product materials; services suppliers who support the provision of services to our customers such as in installation and construction of the networks we sell; IT suppliers; and indirect suppliers for everyday goods and services we need to run our business such as consulting, legal and marketing. Sourcing is done directly by the sourcing organizations in our business groups. The majority of our manufacturing suppliers are based in Asia, whereas our services suppliers are located around the world. In 2021, we had business with around 11 000 suppliers, and 80% of our total supplier spend was distributed across approximately 300 suppliers. We work with Verisk Maplecroft for an independent view of the potential risks of modern slavery globally. In 2021 we published for the first time a supplier list, where we list Nokia contract manufacturers, strategic original design manufacturers and component suppliers, which accounted for approximately 50% of our spend in 2021 for the manufacturing and/or production of our products. See the list [here](#).

Risk assessment of our direct supplier profiles

Master Category	Explanation	Modern Slavery Risk (based on workforce skill level, risk of informal employment, etc.)
Market Categories	(includes site installation and construction suppliers, managed services, technical support services, external workforce services etc)	High
Indirect Sourcing	(includes tax, consulting, financial, legal, marketing, BPO (Business Process Outsourcing), business services, training, HR operation, HR benefits, health and safety, travel, fleet, and events services)	Low
Electromechanics & RF Accessories	(includes cable and connector assy, PCBs, power systems, RF filters, metals, subracks etc)	High
Manufacturing & Delivery	(includes final assembly, ODM, repair and spares, warehousing, test equipment, IT hardware etc)	Medium
Optical Components	(includes optical active discretes, optical passive, transceivers)	Medium
E2E Solutions & Partnering	(includes vertical market solutions and incubation, OEM software solutions and platforms)	Low
Semiconductors	(includes semiconductors)	Low
Standard Components	(includes analog and standard components, RF & timing, computational components etc)	Medium
IT Procurement	(includes IT hardware, IT infrastructure and security, enterprise applications, software and SaaS, IT consulting and telecom services: mobile voice, fixed voice, WAN and data)	Low

## Our Code of Conduct and related policies

We are committed to follow and uphold the laws and regulations in all countries where we operate. Key principles and practices of our ethical business approach are set down for our employees in our Code of Conduct. We support, maintain, and constantly improve our employees' knowledge, training, and communicate regularly on the topic.

We offer multiple channels to report ethical concerns, including a dedicated email address, an online portal, a mobile app, and country-specific phone numbers. Our Business Ethics Helpline allows for anonymous reporting and is open to employees and external stakeholders. We respond to and investigate all concerns promptly and establish remediation plans as needed.

Our Code of Conduct is the basis for our labor conditions and is underpinned by our Global Human Resources Framework and local employment laws, policies and practices. We adhere to the United Nations Universal

Declaration of Human Rights and the United Nations Global Compact. Wherever we operate we meet and often strive to exceed the requirements of labor laws and regulations.

We are aligned with key elements of the social accountability standard SA8000. Our policies, Standard Operating Procedures (SOPs), and Code of Conduct are implemented to cover our employees and are also applied to our suppliers, along with the Responsible Business Alliance (RBA) Code of Conduct.

### Our policies & SOPs cover:

- Child labor avoidance
- Forced labor avoidance
- Freedom of association & collective bargaining
- Worker-Management communication
- Non-discrimination
- Humane treatment
- Working time
- Disciplinary practices
- Compensation
- Occupational health and safety.



## 2.1 Purchasing practices

Our materiality analysis and Enterprise Risk Management help identify potential supply chain risks and we carry out more in-depth analyses to determine all supply chain risks. The outcomes are included in our purchasing category strategies related to nature and size, as well as monitoring and performance related requirements. We review category strategies annually. We also review the supplier location and business context. This approach helps ensure responsible purchasing practises across the company.

We furthermore run regular assessments with our supplier network to help them meet our ethical standards and improve performance as needed. Our general audit covers the full set of supplier requirements, including corporate responsibility requirements, and are often used with new high-risk suppliers or suppliers where there has been significant change in business or location.

## 2.2 Zero tolerance for child and forced labor

We have a strict policy against using child labor and zero tolerance to all forms of forced, bonded, or imprisoned labor in our own operations and in our supply chain.

## 2.3 Freedom of association and collective bargaining

We respect the right to collective bargaining and freedom of association. Collective bargaining agreements are local, and in most countries where we have collective bargaining agreements, employees who have chosen not to be members of a union are also covered. Employees can choose freely to join, not join, or leave unions and associations and select their representatives based on local and international practices.

We encourage active, open communication and dialogue with employees and/or their representatives.

## 2.4 Human Resources and other policies

As stated earlier, we have a strict policy against using child labor and zero tolerance to all forms of forced, bonded, or imprisoned labor. Where such a potential risk is identified, it is thoroughly investigated, and a remediation plan is put in place based on SA8000 recommendations. In our recruitment, retention, promotion and other employment activities, we are committed to complying with the applicable employment and labor laws and regulations wherever we do business, including wage & hour, privacy, immigration, compulsory and child labor,

collective bargaining, anti-discrimination, working time and similar employment rules.

Our Human Rights Policy reflects our expanded portfolio, and it is available **here**. The policy addresses the impact of our products and services on free expression, access to information, exchange of ideas, and economic development. Policies related to other human rights, for example rights related to fair labor practices, modern slavery and human trafficking, and environmental stewardship, are reflected in other company policies.

All of our policies can be found **here**.



## Due diligence and training

We expect our suppliers to uphold the Nokia policies and to share the overall values expressed in our Code of Conduct without any obstruction or discouragement. To demonstrate their commitment to respecting human rights and ethical business conduct, we expect our suppliers to have relevant management systems, resources, and a company code of conduct in place. We also expect our suppliers to apply the same standards to their own suppliers. We run robust assessments with our supplier network regularly to support them in meeting our ethical standards and improving performance where necessary.

We monitor our suppliers through a variety of methods. Since 2020 we have adopted the **RBA Code of Conduct** requirements in addition to the existing Nokia specific requirements for suppliers. We have also communicated the updated supplier requirements to our suppliers. An overview of these requirements can be found on our **website**.

We encourage our tier one suppliers (this includes both our final assembly, and materials and services suppliers) to apply and cascade the same requirements to their own suppliers, which we aim to check through audits and EcoVadis documentation audits. We expect our suppliers to commit to these requirements as part of their contractual obligations. The requirements cover social, ethical and environmental issues. Our Supplier Requirements are also regularly reviewed based on evolving industry standards such as SA8000, or in relation to the codes of organizations such as RBA and **the Joint Audit Cooperation**.

Our in-depth audits covering labor conditions and environmental management for our existing suppliers are specific corporate responsibility deep-dive audits. Implementation of these audits is aligned with the SA8000 methodology, and the audits cover document reviews, interviews with managers and employees, and site visits, as well as inspections of facilities, production lines, and warehouses. Our audits include tier 1 and tier 2 suppliers and we expect and encourage our suppliers to audit their next tier suppliers as one of our official supplier requirements.

All Nokia Corporate Responsibility (CR) auditors are trained through the Social Accountability International 5 day training course on SA8000 standard which provides guidance on how to recognize issues. Experienced auditors further train new auditors and share knowledge and experience.

We use EcoVadis sustainability assessments with a tailored questionnaire and supporting document review to assess the environmental, labor, health, safety, ethics, and sustainable procurement management systems of our suppliers. Responses are scored by an analyst.





# Due diligence and training

We continue to look closely at our top 20 final assembly factories through monthly monitoring on core labor KPIs: working hours, rest day, and percentage of contracted labor. We report publicly on the types and numbers of findings from these audits in our annual sustainability report.

In 2021, due to the ongoing pandemic situation, we had to adapt our auditing, assessment and monitoring. Due diligence planning required greater agility to adapt to the restrictions, lockdowns and uncertainty brought by COVID-19, both in terms of restricted movement and in terms of changes in supply chains. The unprecedented global situation required us to communicate more than ever to our suppliers the need to adhere to the Code of Conduct, even in these extraordinary circumstances.

Much of the normal due diligence activities were moved online due to restrictions based on health guidelines for our own auditors as well as strict visitor restrictions at supplier

premises. The number of onsite audits was limited to certain geographies. To counterbalance this we increased our digital assessments and enhanced awareness through targeted webinars on topics such as modern slavery, diversity and inclusion, climate, responsible sourcing of minerals, and health and safety.

In 2021, we conducted altogether 439 (391 in 2020) supply chain audits and EcoVadis assessments. We conducted 64 in-depth CR audits (24 in 2020) at 28 supplier sites (24 in 2020), and 339 (340 in 2020) suppliers were assessed using EcoVadis scorecards. There were 16 countries covered by these audits, including: China, India, Malaysia, Mexico, Morocco, South Korea, Taiwan, and Thailand.

We also continued monthly monitoring of the working hours, day-off and contractual labour usage monitoring on a factory level for our key final assembly suppliers.

**You can read more about our performance, which we report annually against set KPIs, from our sustainability report as indicated below<sup>2</sup>:**

KPI	Nokia People & Planet report 2021 page no.
Details on CR audits and assessments in 2021	p.70
Details on suppliers participating in sustainability workshops and webinars	p.71
Examples of audit findings and corrective actions taken	p.72

<sup>2</sup> <https://www.nokia.com/about-us/sustainability/downloads/>



## 3.1 Driving improvement through training and capability building

While we conduct assessments to ensure compliance, we realize that assessments alone are not sufficient to drive continuous improvement and competence development on sustainability. By improving the competencies and transparency around labor conditions and workers' rights, health and safety, carbon efficiency, and conflict-free sourcing, we can better address the risks and facilitate the competence development of our suppliers on these issues as well.

In 2021, our supplier workshops were conducted fully online. Following growing concerns around mistreatment of ethnic and other minorities globally, we have conducted refresher training sessions regarding modern slavery, and inclusion and diversity for our suppliers located in high-risk countries, conducted further risk assessments, and carried out a supplier survey around inclusion and diversity. All together we ran 21 supplier training workshops on diversity and inclusion, modern slavery, responsible minerals sourcing and climate change, and health and safety. We expect and encourage our suppliers to cascade relevant Nokia training materials to their entire personnel and to the next supplier tier.

We build the required capacity by first training our own procurement teams who also participate in the trainings for suppliers. We also conduct mandatory Ethical Business

Training for all employees and require them to acknowledge the Nokia Code of Conduct. In 2021, the Ethical Business Training was completed by 97% of our employees.

In addition to our own programs and assessments, we are part of industry coalitions and work to improve the corporate responsibility of global supply chains. In 2021, we became an official member of the RBA and joined its key workstreams.

## 3.2 In-depth training and guidance for onsite personnel

As a key component of our sustainability approach to our supply chain, we carefully track working conditions. We place special emphasis on health and safety as our supply chain includes equipment installation and maintenance contractors who spend much of their time working at height, in confined spaces, and driving long distances. Ensuring that everyone is authorized, competent and fit to work is a key control measure in making sure that on site work can be done safely. This is ensured through our health and safety control procedures which cover the suppliers' management capability when we engage them, reviews of the procedures they have in place when they start working on a project, and with compliance monitored through onsite inspections. We have a mature and established global reporting and investigation process for incidents which includes any suspected instances of child, forced, bonded labor or other forms of modern slavery.

## The risk of mistreatment of minorities and modern slavery

In 2021, we continued to see concerns related to the potential mistreatment of ethnic and other minorities. During 2021, we conducted further risk assessment and due diligence and put together training material around inclusion and diversity. Through supplier training sessions, we communicated our inclusion and diversity practices and requirements concerning the treatment of ethnic or any other minorities. We also emphasized the appropriate actions to be taken by suppliers. Our diversity and inclusion trainings were followed up with a supplier survey where we discovered that not all suppliers have a diversity and inclusion policy and they sometimes lack proper company procedures for ensuring that recruitment practices follow ethical treatment of minorities. Other issues noted in the survey were a lack of effective grievance procedures, including no anonymous feedback channel.

### 3.3 Finding a solution to Conflict Minerals

A key area of our work with our supply chain is the ongoing potential risks identified in the mining, extraction and trade of metals that provide key minerals in electronic components. Risks include military conflict, human and labor rights violations and damaging impacts on the environment. The traceability of our materials and ensuring our products are conflict-free is a priority, and is also reflected in our **Responsible Minerals Policy**.

We aim to contribute to a long-term solution to the issue of conflict minerals that ensures responsible and conflict-free sourcing via legitimate trade and brings sustainable improvements in those countries where the risks are greatest. We demand that our suppliers commit to sourcing these key materials from environmentally and socially responsible sources. We require our suppliers to show their commitment to only sourcing these materials, that either directly or indirectly contribute to conflict, from environmentally and socially responsible sources.

As part of our work to ensure conflict-free minerals we collaborate with our industry peers through the Responsible Minerals Initiative and Public-Private Alliance for Responsible Minerals Trade. In 2021 we continued our work with the Responsible Minerals Initiative to improve the traceability of minerals and ensure responsible sourcing. Our due diligence approach is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

We also encourage suppliers to participate in the Responsible Minerals Assurance Program (RMAP) audit to underscore

and validate their status as a conflict-free supplier. In 2021, as part of our ongoing work with the RMAP to identify and validate the smelters and refineries in our supply chain that are conflict-free or active in the validation process, we achieved a 78 percent validation level. A further eight percent of smelters were identified where our due diligence efforts have demonstrated smelters can be reasonably considered as conflict-free, for example, by sourcing from recycled sources or from outside of the conflict-affected areas.

Those smelters that were not part of the industry assurance program and evaluated as high-risk were asked to be phased out by our suppliers. Direct engagement with such smelters over the past years has not motivated them to collaborate and therefore we feel there is a high likelihood they are engaged in potentially non-compliant practices.

We also undertook a mapping of cobalt and mica in our components based on material declarations for product parts. We addressed 65 relevant suppliers about our requirements regarding cobalt and engaged them to exercise due diligence over the cobalt supply chain and 8 suppliers with mica. As a result we have been able to identify 63 cobalt smelters in our cobalt supply chain, out of which 38 have gone through the Responsible Minerals Assurance Program and have either Conformant or Active status. In 2021, we undertook an assessment of our entire list of materials against ESG risks and updated our responsible minerals long-term target.

For upstream engagement we have continued our work with the Public-Private Alliance, contributing to the development of in-region programs and we participated

in an online delegation to the Democratic Republic of the Congo. We also helped to fund one of the local programs dealing with expanding children's educational access and socioeconomic opportunities for their families and vulnerable women (including survivors of sexual violence); and work on women's leadership and reintegration into communities following sexual violence closely related to the minerals mining and supply chain.



### 3.4 Enhancement of procurement processes

The performance of suppliers across our sustainability monitoring programs such as onsite audits, CDP, EcoVadis, Supplier Health and Safety Maturity Assessment as well as the Conflict Minerals program contribute to our sustainability pillar, which is one of the six pillars of our Supplier Performance Evaluation. Furthermore, there are performance requirements set for our Preferred and Allowed status suppliers across performance categories.



## Grievance mechanisms and worker voice

As stated earlier, we offer multiple channels for both our internal and external stakeholders to report potential ethical concerns or violations of our policies. These channels include an email address, an online tool and dedicated country-specific phone numbers.

While we maintain a zero tolerance for any retaliation related to reporting ethical concerns, we also ensure full anonymity in the event that this is preferred by the concerned party – it is possible to submit the report without disclosing personal details. In 2021, out of 853 concerns raised through our Business Ethics Hotline reporting channels, 52 concerned grievances relating to working with suppliers.

More information on grievances and the investigations carried out can be found on pages 62 and 63 in our **annual sustainability report**.



### Helpline information

**Email:** [ethics@nokia.com](mailto:ethics@nokia.com)

**Phone:** [www.nokiaphone.ethicspoint.com](http://www.nokiaphone.ethicspoint.com)

**Website:** [www.nokia.ethicspoint.com](http://www.nokia.ethicspoint.com)

## Activities in 2021

### 5.1 Increasing supply chain transparency

As a global company with operations all around the world, it is our policy to aim for increased transparency in all areas of sustainability reporting. In March 2022 we published our annual sustainability report, Nokia People & Planet for 2021, in which we again included several case examples of findings of non-compliance in supply chain audits, and the actions taken to resolve those findings.

In 2021, our audits uncovered 13 cases related to a non-compliance or potential risk of forced labor. The majority of cases concerned employees having to cover the cost of medical examination or transportation fees during the recruitment process. Such costs were generally reimbursed two or more months later as part of the salary. This delay provides for a potential risk of bonding. All such cases were addressed with suppliers through revision of their recruitment procedures and contracts with the manpower agencies or directly with medical institutions ensuring that the fees would not be paid by employees.

Other cases noted included a supplier who had implemented financial assistance for employees with a variable repayment rate between 3% to 43% of worker's monthly base salary. The supplier has changed its policy and loans are no longer provided. Other instances related to missing papers in agency worker employee files, such as evidence of a valid contract agreement. These findings were addressed and most cases were closed at the closure audits. For one case the closure audit is due in 2022.

We also uncovered four instances of nonconformity related to child labor avoidance in 2021. Cases included missing personal files or identity cards that meant the auditor could not immediately verify workers' ages. The suppliers provided evidence that all workers in question were above the minimum age. They also fixed the process and corrected the missing documentation issue.

In another case, there were no procedures in place to assist underage children if found working for the supplier in question who did otherwise have a policy and process established to ensure that workers below the legal minimum working age are not hired either directly or indirectly via labor contractors. As a corrective action, the supplier established a procedure to provide for the welfare of any underage children discovered in their employ.

A third case involved apprentices who were paid below minimum wage for longer than six months. As a corrective action, the supplier established apprentice and intern employment policies and procedures. Moreover, all of the apprentices were also paid at least the legal minimum wage. In all cases designated as child labor avoidance risks, the findings were addressed with corrective action plans and closed within 2021.

#### Identify, investigate and remediate

Child and other forced labor in supply chains remain a challenge for all global companies and the ICT industry has a particularly long and complex supply chain with thousands of suppliers. Building and maintaining a robust due diligence

process is critical to responding to that challenge and continually improving. Providing the channels and tools and taking immediate and clear action with proper remediation are a necessity to deal with all forced labor incidents.

In April 2022, Nokia was notified, by a former business partner and employee of a supplier, of an alleged use of child labor and unsafe working practices by a subcontractor supplying services for a project between May and August 2021 in the Philippines. Nokia initiated its investigation process and immediately suspended the supplier from any further projects. The potential victims could not be identified mainly due to the lack of documentation from the supplier. Although the supplier has denied the allegations, based on evidence including professional medical opinion concerning the likely age of some individuals depicted in received photo evidence, Nokia believes it is prudent to conclude that there may well have been a breach of Nokia's Code of Conduct and Human Rights policy related to the zero tolerance for child or forced labor of any kind in its own or supplier operations.

Nokia has made the decision to permanently block the supplier in question and any future supplier linked with the owner from all Nokia business. Nokia continues to assess opportunities to improve its processes and supplier engagement efforts such that any potential lessons learned can be fully integrated into our future ways of working. A Remediation Committee has been established for this case and remediation actions are being planned with external expert and non-governmental organizations.

## Activities in 2021

The pandemic, with its travel restrictions and lockdowns, increased the potential for unacceptable ways of working but our supplier requirements remain unchanged. This case underscores the need for continual vigilance and the importance of robust reporting channels, tools and procedures to identify, investigate and remediate potential cases of non-conformance with our standards.

We continue to report against the long-term targets and KPIs in our annual sustainability report and follow up on issues mentioned above in order to check continued adherence. Corrective action examples are clearly noted in our People and Planet report. Failure to address audit findings within 6 months negatively affects the supplier's performance evaluation, as their audit score is lowered. Supply chain workers are engaged through workers interviews at CR audits in order to include the workers' voice, and Ethical Helpline channels are open for all individuals and stakeholders to flag concerns, including our supplier employees. We disclose examples of our findings on page 72 of the People and Planet report. The number of grievances coming from suppliers were reported in the integrity section of the People and Planet report with a commentary on page 63. In 2021, out of the total 853 concerns raised via the Helpline, 52 cases related to working with suppliers (67 in 2020). Read more on raising concerns on pages 63 under the Ethics and Compliance section of our People and Planet Sustainability report [here](#).





## 5.2 Collaboration and looking forward

In 2021, we became an official member of the RBA and joined its key workstreams. RBA is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains. Already since 2020 we have incorporated RBA's Code of Conduct into Nokia supplier requirements.

Besides our work with the RBA and other key supply chain official bodies, we also continued our cooperation with the Joint Audit Cooperation initiative (JAC). JAC is an association of telecom operators (our customers) aiming to verify, assess and develop corporate responsibility implementation across the manufacturing centres of important multinational suppliers of the Information Communication Technology (ICT) industry. JAC members share resources and best practices to develop long term sustainability and corporate responsibility implementation in the different layers or tiers of the ICT supply chain globally. In 2021, two of the 64 in-depth corporate responsibility audits we performed on our suppliers were conducted through the JAC framework.

As part of our commitment to respect Human Rights, Nokia is a member of the multi-stakeholder Global Network Initiative (GNI), which examines human rights in the ICT sector, involving leading ICT companies, investors, academics and civil society groups. Companies participating in GNI are independently assessed every two to three years on their

GNI commitments. This independent assessment is carried out by a GNI accredited external assessor. Nokia was the first telecommunications equipment vendor to successfully complete a GNI assessment in 2019. We completed our second independent assessment earlier this year with Foley Hoag LLP as the assessor, and are proud to report that in May the GNI board found we have made good faith efforts to implement the GNI Principles on freedom of expression and privacy with improvement over time..

Looking forward, we aim to keep the system, processes and procedures at the current high standard, while looking for potential improvement in ways of working and striving for increased vigilance. We will expand our collaboration where it enables greater transparency and positive impact. We will also continue to drive the dialog on modern slavery and human rights in the supply chain in 2022 and, wherever possible, encourage our main suppliers to recognize and act on the challenge of modern slavery.

This statement covers the financial year of 2021.

**Pekka Lundmark,**  
President and CEO  
Nokia Group





This statement applies to Nokia Corporation and its subsidiaries.

The following Nokia affiliates must report for the purposes of the United Kingdom's Modern Slavery Act: Nokia UK Limited; Nokia Solutions and Networks Oy, and Alcatel Submarine Networks UK Ltd.

Under the Modern Slavery Act (Cth) and Modern Slavery Act (NSW) the reporting entity for the purposes of this statement in Australia is Nokia Solutions and Networks Australia Pty Limited. This Australian entity is a fully integrated entity within the Nokia global group and aligns to all policies and practices of Nokia globally.

The Board of Directors of Nokia Solutions and Networks Oy, for itself and the Nokia affiliates listed in this note approved this Statement on 29 June 2022. Tommi Uitto, Chairman, Nokia Solutions and Networks Oy.

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