



Nokia Human Rights Policy

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1 Purpose

The Nokia Human Rights Policy outlines our commitment to respect and support Human Rights based on the principles and values laid out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and its related covenants), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. These principles and values are embedded in our Code of Conduct that every employee is required to follow and are reflected in our commitment to the principles of the UN Global Compact and in our participation in the Global Networking Initiative. We also expect our suppliers and business partners share these values to ensure that communications technology and our business respects and support human rights.

2 Background

At Nokia, we understand that human rights risks exist along our value chain, from supply chain management to the end-use of our technology by others. We have clear criteria, standards and processes with which we engage our suppliers to ensure respect of human rights. We have employee policies and practices to ensure our own operations are fully aligned with international human rights standards.

We are also concerned about the impact our products and services can have on society. Nokia believes that connectivity and the technologies we provide are a social good that can support human rights by enabling free expression, access to information, exchange of ideas, and economic development. We recognize, however, that technology can be misused and as a communications technology equipment vendor, we have a responsibility to ensure our technology is not used to limit or infringe on human rights.

We continue to work both in our own company through policy, training and awareness raising and with the broader stakeholder community to drive the dialog on balancing the privacy rights of the individual with the increased need for security for both individuals and societies.

3 Scope

This policy addresses the impact of Nokia 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 labour practices, modern slavery and human trafficking, and environmental stewardship, are reflected in other Nokia policies.

The most salient human rights risks related to our company and business involve the potential misuse of the technology we provide, particularly in relation to lawful interception capabilities and activities by governments that relate to the network infrastructure equipment that we design, produce and support for telecom operators and other customers.

There is also potential for misuse of technologies that have considerable societal benefits but that could also be used for surveillance or to intercept communications, limit free expression, block access to information, and reduce the exchange of ideas. Such technologies include, as examples but not limited to, drones, artificial intelligence and facial recognition.

The potential misuses of technology continue to evolve and therefore we have set clear principles on how we approach these issues. Our Human Rights Due Diligence process helps mitigate the most salient risks with the aim of ensuring that human rights are not infringed upon through the misuse of the technology we provide to our customers.

4 Principles of the Policy

The principles of Nokia's policy are based on 4 core beliefs:

1. That more connectivity is better than less and that the technologies we provide are a social good that can support human rights by enabling free expression, access to information, exchange of ideas and economic development.
2. That long-term answers to the tension between the right to privacy and security and to how technology is best used to enable human rights will come not from companies and technical solutions, but from open societal debate and from informed decision-making processes.
3. That technology vendors such as Nokia have a role to play to help ensure that the technologies we provide are used to respect, and not infringe, human rights.
4. That the misuse of these technologies to infringe human rights through actions such as unlawful surveillance is wrong and, ultimately, that the responsibility of such actions lies with those who conduct the act of misuse.

Our policy is as follows:

1. Nokia will not knowingly provide technology or services for the purpose of limiting political discourse, blocking legitimate forms of free speech, or otherwise contributing to activities that are not consistent with internationally recognized human rights standards.
2. Nokia will provide passive lawful interception capabilities to customers who have a legal obligation to provide such capabilities. This means we will provide products that meet

agreed standards for lawful intercept capabilities as defined by recognized standards bodies such as the 3rd Generation Partner Project (3GPP) and the European Telecoms Standards Institute (ETSI). We will not, however, engage in any activity relating to active lawful interception technologies, such as storing, post-processing or analyzing of intercepted data gathered by the network operator.

3. Nokia will provide communication systems, drones, video transmission capabilities, networking capabilities and other technology to governmental and enterprise customers for purposes such as public safety, transport, energy and smart city enablement. We will not, however, pursue direct business with intelligence agencies or similar institutions involving or relating to active surveillance or interception of communications.
4. Nokia sells and licenses solutions to the defense sector that are designed for non-lethal purposes and based on commercial communications technology.
5. Nokia will seek to prevent the sale of our products and services in cases where we believe there is a significant potential that those products or services could be used to infringe human rights. To assess such situations, we have a senior-level internal review process that focuses on sales in countries that have been deemed by an independent expert as presenting a high human rights risk.
6. Nokia will, in situations where conflict may exist between local law or its interpretation and the generally accepted international human rights standards, strive to resolve that conflict in a manner that best respects human rights.
7. Nokia will remain committed to active industry level dialogue on issues related to the balance between the right to privacy, freedom of expression, and personal security as fundamental human rights. As part of those efforts we will continue to call for increased transparency from governments related to their surveillance activities and for greater clarity about the laws and regulations related to these topics.

5 Implementation and Communication: Human Rights Due Diligence

The Nokia Human Rights Due Diligence (HRDD) process is a non-commercial cross company investigative process. This process is pre-emptive and rigorous; it is used to identify the potential risk level of human rights violations through the misuse of our technology before any sale is done, while also attempting to identify ways to mitigate these risks to ensure compliance to our Human Rights Policy.

Our approach looks at aspects such as, a country’s long term commitment to uphold Human Rights, intended use of technology and customer type to help identify potential risk early in the process and trigger the required HRDD investigation and senior-level approval/denial review where needed. The HRDD triggers are a mandatory part of the sales approval process.

Training, tracking results, communication of findings, checkpoints and triggers for the process are reviewed and where needed improved on an ongoing basis.

Nokia communicates more on its commitment to transparency in our annual People and Planet Sustainability report.

6 References

Document Title	Location
Nokia Responsible sourcing	Nokia Responsible sourcing
Conducting our business with integrity	Conducting our business with integrity