

## People Framework

Nokia Global People Framework



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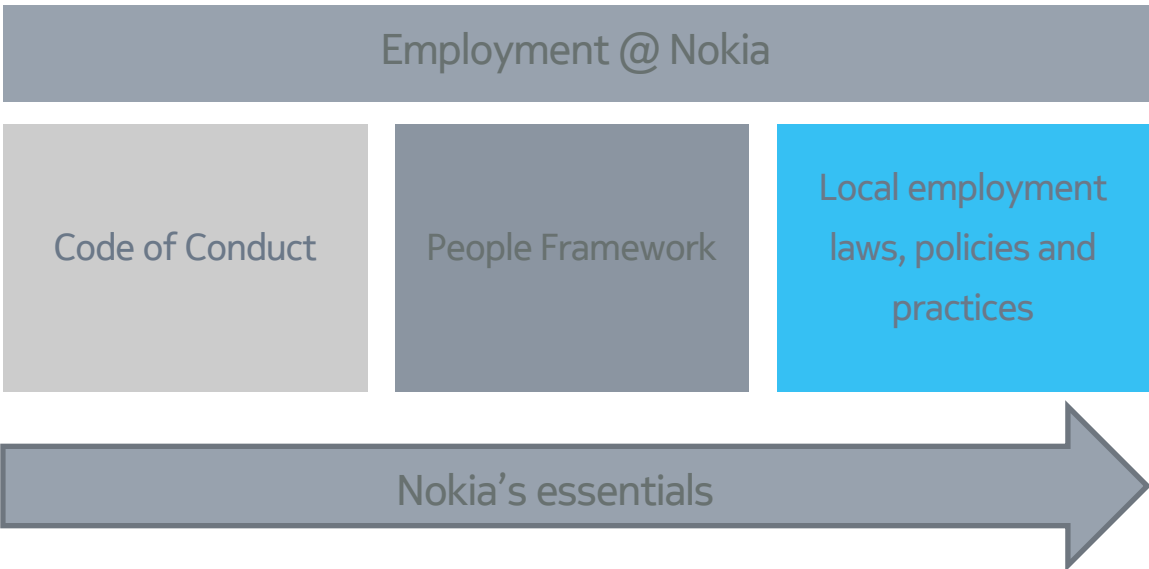
## 1 Purpose

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 our ways of working, our essentials, are the foundation of everything we do at Nokia. The purpose of Nokia’s Global People Framework (the “Framework”) is to summarize the core People 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 People guiding principles and what they mean in practice. For further information on country specific rules based on applicable country legislation, collective agreements and practices, please have a look at the relevant country People intranet pages. Local laws and regulations take precedence in the event of a conflict with the Framework.

The picture below illustrates NOKIA’s People guiding principles.



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

The formal and approved regulation for implementing People processes and practices is called a Standard Operating Procedure (SOP). All People SOPs are global by definition – i.e. apply to all Businesses within Nokia. SOPs are developed and maintained by the Nokia People Direction function. The Leader of the appropriate Portfolio for the given service, process or practice is the owner. Final approver is Nokia’s Chief People Officer or delegates.

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

All People 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 ways of working, our essentials, are the enablers for us to deliver our purpose and execute on our business strategy commitments. Created in collaboration with our people and customers, they constitute a shared foundation which defines the way we work together and our uniqueness in the market. By reflecting those essentials in our everyday actions and the way we work, collaborate and communicate we are setting Nokia and its people up for success.

We have three essentials which incorporate our values and determine how we, both as a company and as individuals, interact with each other and our external stakeholders. They reflect how it should feel to work at Nokia, and what we want our customers to experience working with us:

- Open – I feel open in mindset; to opportunity, to inspiration, to the future and evolving market needs, to new approaches, and to collaborate. I am ready to question the status quo and I am open to learning so I can constantly grow. Collectively, we are open to continuous renewal, which drives our success.
- Fearless – I feel fearless and bring my authentic self to work, sharing my ideas and opinions without worry of rejection. I know mistakes are ok as long as we can learn from them. I feel safe to challenge and can talk transparently with my colleagues, sharing and receiving constructive feedback in a positive and supportive environment. Collectively, we are fearless because we feel free to speak our minds, embrace experimentation and respect each other.
- Empowered – I feel empowered and supported to make decisions and own my work because I am trusted and I trust my colleagues, who have my back in success or failure. With clear expectations and decision-making processes, I know what I'm individually accountable for and take sole responsibility for the outcome. I know how my work helps deliver our purpose. Collectively, we are empowered to achieve our goals and make our purpose real.

Commonly shared ways of working, together with our clear purpose and defined strategic commitments all together is what guides our business and sets it up for success.

## 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 a condition to employment

Nokia supports active, open communication and dialogue with employees and/or employee representatives. Furthermore, consistent with our essentials 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. Nokia is committed to keeping the unexplained gender pay gap closed on a yearly basis. For more information, please see the Nokia [Rewards and Recognition](#) intranet or contact your local People Organization.

## 5 Fair Employment

### 5.1 Inclusion & Diversity

As a large, multinational company, we have an incredibly diverse workforce, but diversity is of little value if we are not making use of it. Inclusion at Nokia is about creating an environment where all our people feel, and are, valued and accepted through our everyday actions. They should feel able to bring their whole selves to work, in order to contribute their personal best. See more in the [Inclusion & Diversity intranet](#).

In practice, we encourage the following behaviors:

- **leveraging the unique traits in people** – both seen and unseen – to achieve better business results and sustained profitable growth.
- **appreciating another’s point of view:** people with emotional and social intelligence can create an environment based on trust, where people feel safe to share their opinions and be listened to. Thus, nobody can be ignored. We do not subscribe to stereotyping or exclusion of any kind.
- **collaborating through conversation and involving people in decision-making:** removing biased processes and mindsets, embrace the uniqueness of individual colleagues; including all the seen and unseen traits, to give people a sense of belonging and provide them with equal opportunities to grow, progress and contribute.
- **diversity of identities and thought:** Nokia respects people of different genders, sexual orientation, race, ethnicity, religion and belief, as well as people with disabilities and of different generations. We bring people with diverse experiences, education, expertise and backgrounds together for the benefit of the company.

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, religion, belief, 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 essentials. Thus, all forms of harassment, victimization and bullying whether racial, sexual, relating to religion or belief, disability, age, sexual orientation, gender 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](#).

In order to stay honest to our commitments, we conduct a yearly inclusion survey, which guides the yearly agenda setting and actions of Nokia I&D.

## 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 ways of working and essentials 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 the essentials. For more information please see the [Perform](#) employee journey in People Services site and your [Employee country hub](#) page.

## 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 standards, 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/ People 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 People concerns/grievances you may go to your line manager in the first instance or People Organization or to another manager. Many countries also have a country specific local grievance process to resolve People issues but, at a minimum, Nokia expects all employees to be able to raise an issue internally and commits to taking such issues seriously, investigate and resolve.

For more information please refer to your country People page or contact People Services. 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 teleworking approach which provides some flexible working from home 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. For further information on applicable working time rules, please see your [Employee country hub](#) page.



## 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 the wrong hands.

You must 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. You must always have a good business reason for disclosing company confidential information. Please also note that your confidentiality commitment continues even after the end of your employment with Nokia. See Nokia's [Information Security](#) intranet pages for more details.

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. For more information, please see Nokia's [Conflict of Interest](#) intranet pages.

## 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. For more information please see Nokia [Code of Conduct](#), Nokia's [Privacy Management Policy](#), Nokia's [Privacy Statement](#) and [Employment Privacy Statement](#) or visit Nokia's [Privacy](#) intranet.

## 5.8 Health, Wellbeing and Safety

We promote health and 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. For more information see the [Safety, Security & Privacy](#) intranet.

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, COVID 19). 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 more information please go to your [Employee country hub](#) as local practices and regulations vary.

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

Open is one of our essentials and it means we are open to learning and to continuous renewal which 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.

For more information about learning opportunities, please see the comprehensive [Learning Store](#) internet pages, or where intranet access is not available (e.g. production personnel); contact your manager/local People Organization for advice.

## 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 People 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](#). For further information on [Exit Management](#) please visit the People Manager hub.

## People Framework

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