Nokia Responsible Minerals Policy

Nokia Responsible Minerals Policy builds on the Nokia Code of Conduct, and describes further our commitment and our requirements towards socially and environmentally responsible sourcing of materials that go into our products.

We recognize the risk that the illegal extraction and trade of materials such as tin, tungsten, tantalum, gold and cobalt is fueling military conflict in some countries and may also cause human rights violations and environmental degradation. We actively work to find a sustainable solution to the issue of minerals sourcing to ensure responsible and conflict-free sourcing through legitimate trade and positive development in the affected regions as well as expanding our scope of materials due-diligence going beyond Conflict Minerals1.

We therefore require that our suppliers must commit to sourcing those materials from environmentally and socially responsible sources only. Materials, which either directly or indirectly contribute to conflict, are unacceptable.

Nokia complies with applicable laws and commits to drive best industry practice. We collaborate with our industry peers through the Responsible Minerals Initiative to improve traceability of minerals and enable solutions for responsible sourcing.

We incorporate the principles of this policy into our contractually binding Supplier Requirements and will conduct due diligence consistent with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We expect our suppliers to establish and maintain a publicly available policy in responsible mineral sourcing and conduct the due diligence to their own supply chain consistent with OECD Guidance.

Additionally, we require our suppliers to report on their due diligence regarding sourcing of tin, tantalum, tungsten, gold and cobalt and maintain the respective data for 5 years.

We continue to create more awareness and build capacity within our supplier base through training and regular feedback to suppliers.

This Policy will be reviewed regularly and updated as needed. Nokia commits to disclosing the progress of the implementation of this Policy as part of its annual sustainability reporting and in accordance with legal requirements.

Concerns and violations of this policy can be reported to Nokia’s Board of Directors, its non-executive members, or its subcommittees through our official grievance channels.

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1 Columbite-tantalite (coltan) (or its derivative tantalum), cassiterite (or its derivative tin), gold and wolframite (or its derivative tungsten).