



# Norwegian Transparency Act Statement

## financial year 2023

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# 1 Background

Nokia Solutions and Networks Norge AS is a Norwegian registered company 100% owned by Nokia. Nokia Solutions and Networks Norge AS as an integrated part of Nokia, benefit from Nokia's work on social responsibility in respect to the Norwegian Transparency Act. Nokia on a global view is referenced in the following.

Nokia is committed to the Human Rights 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, Organization for the Economic Co-operation and Development (OECD) guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

## 2 About Nokia

At Nokia we create technology that helps the world act together. As a B2B technology innovation leader, we are pioneering a future where networks meet cloud to realize the full potential of digital in every industry. In addition, we create value with intellectual property and long-term research, led by the award-winning Nokia Bell Labs. We have built industry-leading patents, and technology programs.

Customers and business partners worldwide trust Nokia to deliver secure, reliable, and sustainable networks today – and work with us to create the digital services and applications of the future.

Our main customers are communication service providers. We also provide solutions to a growing number of enterprises in the private and public sector that use our network portfolio to increase productivity, efficiency, and sustainability. We have four core business groups: Network Infrastructure, Mobile Networks, Cloud and Network Services, and Nokia Technologies. For more information see our [financial reporting](#).

Nokia fundamentally believes that connectivity and the technology we provide are a social good that can support human rights and we acknowledge the responsibility that comes with this. Upholding human rights is a complex issue that covers not only the technology we provide, but also our partners, suppliers and our own operations. Therefore, we strive to continuously learn and improve, and we believe that engaging with the broader stakeholder community is the best way forward. Our Human Rights policy is available online and addresses our most salient risks related to the potential misuse of the technology we provide. Policies related to other areas of human rights, for example rights relating to fair labor practices, modern slavery and human trafficking, and environmental stewardship are covered by other company policies.

[Human Rights Policy](#)

[Code of Conduct](#)

Responsible Business Alliance (RBA) [Code of Conduct](#)

## 3 Human rights due diligence

Nokia has a rigorous Human Rights Due Diligence (HRDD) that targets the potential misuse of the technology we provide. It is a pre-emptive process applied before any sale is made and is used to identify the possible risk level to human rights through the potential misuse of our technology.

The process examines a country's long-term commitment to upholding human rights, the intended use of the technology in question and the customer type, to identify potential risks early in the process and trigger the required HRDD investigation and senior-level approval/denial review where needed.

For country risk ratings, we use an external assessment provider. The HRDD process triggers are a mandatory part of the sales approval process. Training, results tracking, the communication of findings, checkpoints and triggers for the process are reviewed and, where needed, improved by the Head of Human Rights on an ongoing basis

### 3.1 Outcomes

Of the HRDD cases investigated in 2023, 96% of total cases were resolved as "Go" or "Go with conditions" (63% and 33% respectively) and 4% as "No go". We have again published anonymized case examples [online](#) from our HRDD work in 2023 to provide insight and examples on the robustness of this process

## 4 Responsible sourcing

### 4.1 Overview

#### 4.1.1 Nokia Supply chain profile

In 2023, we conducted business with around 10 000 suppliers, and 80% of our total supplier spend was with approximately 300 suppliers around the world. Our suppliers fall into seven broad categories:

- Component suppliers
- Final assembly suppliers
- IT hardware, software, and services suppliers
- Logistics and transport services suppliers
- Managed services suppliers around Nokia's networks
- Regional and local service suppliers supporting the delivery of services at customer sites
- Suppliers delivering goods and services required to run Nokia's operations

Our manufacturing (final assembly and hardware) suppliers are mainly based in Asia, whereas our service suppliers are located around the world.

We continue to work with Verisk Maplecroft, a global risk analytics company, for an independent view of the potential risks of modern slavery globally. In 2023, we again published an updated supplier list including Nokia's contract manufacturers, strategic original design manufacturers (ODMs) and component suppliers. The listed suppliers accounted for approximately 50% of our spend in 2023 for the manufacturing and/or production of our products. The Nokia Supplier List is available on our [website](#).

## 4.1.2 Purchasing practices

Our sustainability materiality analysis and enterprise risk management procedures help identify potential supply chain risks. We carry out more in-depth analyses to determine all supply chain risks via our dedicated Supplier Sustainability Risk Dashboard. The outcomes are included in our purchasing category strategies related to type and size of supplier, in addition to our monitoring- and performance- related requirements. We review category strategies annually with our purchasing category leads, as well as supplier location and business context. This approach helps ensure responsible purchasing practices across the company.

We conduct regular assessments with our suppliers to help them understand and meet our ethical standards and identify areas of improvement as needed. Our general audit covers the full set of supplier requirements, including corporate responsibility requirements, and is often used with new suppliers located in high-risk countries or suppliers where there has been significant change in business scope or location.

## 4.1.3 Zero tolerance for child and forced labor

We have zero tolerance for, and strictly forbid, any form of child labor and all forms of forced, bonded, or imprisoned labor in both our own operations and our supply chain.

## 4.1.4 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 these agreements, the fundamental terms and conditions of employment are the same whether employees have chosen to be members of a union or not. 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 dialog with employees and/or their representatives.

## 4.1.5 Human Rights Policy and other policies

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.

Our [Human Rights Policy](#) addresses our most salient risks related to the potential misuse of the technology we provide. Policies related to other human rights— for example those related to fair labor practices, modern slavery and human trafficking, and environmental stewardship— are reflected in other Nokia policies, which can be found [here](#).

Nokia’s approach is inspired by the values and principles included in international human rights frameworks, such as 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 its core labor standards, the OECD’s Guidelines for Multinational Enterprises, and is aligned with the United Nations’ Guiding Principles on Business and Human Rights.

As stated earlier, we have zero tolerance and strictly forbid any form of child labor and all forms of forced, bonded or imprisoned labor in both our own operations and our supply chain. 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 wages and hours, privacy, immigration, compulsory and child labor, collective bargaining, anti-discrimination, working time and similar employment rules.

For Nokia, inclusion and diversity are important, as well as a platform for greater innovation, superior organizational performance, and customer service excellence. As a large, multinational company, we naturally have a diverse workforce. We strive to diversify Nokia’s talent pool, and aim to increase the share of female employees to 25% by the end of 2030. To support this long-term target, we aim to maintain a minimum target of female hires in global external recruits every year. In 2023, we exceeded this minimum ambition of 27% by hiring 28% female hires during the year. Creating a culture of inclusion is vital to Nokia. We gather feedback from our employees through our Annual Employee Survey and ensure that we take necessary action to further improve the Nokia employee inclusion experience.

## 4.2 Due diligence

We require our suppliers to uphold Nokia’s policies and share the overall values expressed in our Third-Party 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 and resources in place, as well as a company code of conduct. We also expect our suppliers to apply the same standards to their own suppliers. We conduct regular, robust assessments with our supplier network to support them in meeting our ethical standards and improving performance where necessary.



We use a range of methods to monitor our suppliers. We have been a member of the RBA since 2021, and we have adopted the [RBA Code of Conduct](#) requirements for suppliers, and included those into the Nokia-specific supplier requirements. These are part of our contractual supplier obligations covering social, ethical, and environmental issues. An overview of these requirements can be found on our [website](#). We expect our tier 1 suppliers (this includes both our final assembly suppliers and our materials and services suppliers) to apply and cascade these to their own suppliers, which we aim to check through audits and assessments.

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 the [RBA](#) and the [Joint Audit Cooperation \(JAC\)](#).

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

We conduct in-depth corporate responsibility audits covering labor conditions and environmental management for our existing suppliers. Implementation of these audits is aligned with the SA8000 methodology, and 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 require our suppliers to audit their next-tier suppliers.

Nokia corporate responsibility auditors are trained through a Social Accountability International (SAI) auditor training on the SA8000 standard which provides guidance on how to recognize issues. Experienced auditors further train new auditors and share knowledge and experience across the teams.

In 2023, we conducted a total of 635 supplier audits and EcoVadis assessments, of which 141 were in-depth corporate responsibility audits of 71 suppliers and 446 were online assessments with EcoVadis on labor, safety, and environmental elements. The number of audits significantly increased compared to 2022 as COVID-related restrictions were removed. There were 18 countries covered by these audits including China, Hungary, India, Malaysia, Mexico, Morocco, Taiwan, the Philippines, and Vietnam.

We report publicly on the types and numbers of findings from these audits in our annual [People & Planet sustainability report](#). Examples of audit findings and corrective actions taken can be viewed [online](#).

We also continued the monthly monitoring of working hours, days off, and contractual labor usage on a factory level for our key final assembly suppliers. Our performance, which we report annually against set KPIs, is summarized in the table below for 2023, with more details available in our People & Planet report:



KPI	Nokia People & Planet report 2023 page number
Corporate sustainability audits and assessments in 2023	p.60
Suppliers participating in sustainability workshops and webinars	p.60

## 4.3 Training

### 4.3.1 Driving improvement through training and capability building

While we conduct assessments to ensure compliance, and we realize that while these drive continuous improvement and competence development on sustainability, they are not sufficient. By improving our 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 competence development of our suppliers.

In 2023, we continued to develop supplier capabilities around issues found in audits through supplier workshops. In total we ran 12 supplier training workshops and webinars on subjects such as modern slavery, labor migration and ethical recruitment, inclusion and diversity, responsible minerals sourcing, climate change, circular practices and health and safety.

We build the required capacity by first training our own procurement teams who then participate in supplier training. We also conduct mandatory Ethical Business Training for all employees and require them to acknowledge the Nokia Code of Conduct. In 2023, our Ethical Business Training was completed by 98% of our employees.

In 2023, Nokia conducted an online seminar on “Child Labor and Young Workers in Global Supply Chains” with UNICEF Finland, providing Nokia employees working with suppliers a better understanding of the challenges involved and need to work vigilantly to mitigate child labor risks. The webinar also covered how Nokia remediates child labor if found and established control points.

In addition to our own programs and assessments, we are part of industry coalitions such as the RBA, and work to improve the corporate responsibility of our global supply chains. We contribute to RBA workstreams focused on various supply chain topics.

### 4.3.2 In-depth training and guidance for on-site 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 part of our supply chain includes equipment installation and maintenance contractors who spend much of their time working at height or driving long distances.

Ensuring that everyone is authorized, has the appropriate competences and is fit to work is a key control measure in enabling on site work to be done safely. This is supported by

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our health and safety control procedures, which address the supplier's management capability upon initial engagement, enable reviews of procedures they have in place when they start working on a project and monitor compliance through on-site inspections. We have a mature and established global reporting and investigation process for incidents, which also includes the reporting and investigation of any suspected instances of child, forced, or bonded labor and other forms of modern slavery.

### 4.3.3 The risk of mistreatment of minorities and modern slavery

Modern slavery and forced labor remain a challenge for countries and supply chains. In 2023, we took an in-depth look into child and young labor risks and revised our internal Child Labor, Prohibited Labor by Young Workers, and Forced Labor Remediation Guidelines. This followed our prior analysis of labor migration and its impact on our supply chain.

We have robust supplier audit and assessment processes and procedures in place. We continue to raise awareness of modern slavery through workshops and training with suppliers on the topic of good labor practices, ethical recruitment and inclusion and diversity. In 2023, we conducted training for our employees on child rights in the supply chain. Our work also includes advocating for greater dialog on non-discrimination of ethnic and other minorities.

## 5 Grievance mechanism

We offer multiple channels for our internal and external stakeholders to report ethical concerns or suspected violations of the stated policies. Our speak-up culture is designed to ensure that employees feel comfortable raising ethics and compliance concerns without fear of retaliation.

Nokia has zero tolerance for retaliation against any employee or contractor who raises a concern in good faith or provides evidence in support of such a concern. The Nokia Ethics Helpline is operated by a third-party provider, Case IQ. Reports and conversations are confidential, and those reporting concerns may remain anonymous if they wish, in jurisdictions where anonymous reporting is allowed. In 2023, a total of 1056 concerns were raised through the Nokia Ethics Helpline reporting channels, of which 71 were related to working with suppliers.

More information on grievances and the investigations carried out can be found on page 84 in our [People & Planet sustainability report](#) and through our [website](#).

## Nokia Ethics Helpline information

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

**Phone:** <https://nokiaccms.i-sight.com/portal/dialing-instructions>

**Website:** <https://nokiaccms.i-sight.com/portal>

## 6 Stakeholder engagement and continuous improvement

In 2023, we continued our collaboration with a number of key organizations that focus on corporate responsibility in global supply chains. As a member of the RBA, we participated in workstreams covering labor rights and environmental issues.

We also continued our collaboration with the Joint Audit Cooperation (JAC). This is an association of telecommunications operators (our customers) that aims to verify, assess, and develop corporate responsibility implementation across the manufacturing centers of multinational suppliers of the ICT sector. The membership of JAC increased in 2023 and now includes 27 of the world's telecom operators. JAC members share resources and best practices to develop long-term sustainability and corporate responsibility implementation in the different layers or tiers of the global ICT supply chain. In 2023, we conducted 189 supplier audits, 127 of which were conducted through either the RBA Validated Assessment Program (VAP) audits or the JAC framework.

As part of our commitment to respecting human rights, we continue to be an active member of the multi-stakeholder Global Network Initiative (GNI), which examines human rights in the ICT sector and involve leading companies, investors, academics, and civil society groups. Companies participating 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 successfully completed our second independent assessment for the GNI, with the public report made available in 2023. In particular, the assessors highlighted Nokia's strong human rights culture, noting that many issues were flagged and addressed informally even prior to surfacing during the formal process. They also praised our robust human rights due diligence process, which encompasses relevant functions across the company with strong escalation mechanisms

We aim to keep our robust systems, processes, and procedures at the current high standard, while seeking to continually improve our ways of working and driving for increased vigilance. We will also continue to drive dialog on modern slavery and human



rights in the supply chain and encourage our main suppliers to recognize and act on the challenges of modern slavery.

This Statement covers the financial year of 2023.

Nokia Solutions and Networks Norge AS

Fornebu, 25. juni 2024

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Jostein Morken  
Managing Director and  
Chairman of the Board

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Johanna Jukka

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Dag Hesby

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Margit Kvalø

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Morten Kveil