

# Modern Slavery Statement 2025

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 other forms of modern slavery in both its own operations and any part of its global supply chain.

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# 1 Mapping Nokia's business and supply chain

## 1.1 Nokia's business profile

Nokia<sup>1</sup> is a trusted global provider of connectivity, advancing fixed, mobile and transport networks to meet the demands of an AI-enabled future. Today, Nokia's technology is an enabler of the AI supercycle – powering its customers with secure and advanced connectivity.

As a B2B technology innovation leader, Nokia is driving the next evolution of networking to enable people, machines and devices to interact in real time. In addition, Nokia's value is supported by its intellectual property portfolio and long-term R&D activities, led by Nokia Bell Labs. These activities have resulted in a portfolio of patents and ongoing technology development programs.

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

Connectivity plays an increasingly important role in the economy and in society. As a result, Nokia serves a growing number of customers who provide critical services to end-users. Nokia's customers comprise four broad groups: Telecommunication Providers, AI & Cloud, Mission Critical Enterprise & Defense, and Technology Licensees.

In 2025, Nokia operated with four business groups: Network Infrastructure, Mobile Networks, Cloud and Network Services, and Nokia Technologies. For more information, please refer to Nokia's 2025 Annual Report<sup>2</sup>, which has been subject to third party assurance.

Nokia's employees work in R&D; in the production, deployment and maintenance of network hardware and infrastructure; or in corporate roles, including sales, legal, compliance, sustainability, finance, human resources and other business support functions.

This Statement focuses on the parts of Nokia's supply chain where the company sees the greatest potential risk of forced or bonded labor or other forms of modern slavery. Nokia considers the risk of encountering modern slavery in its own operations as highly unlikely.

For further details on working conditions for Nokia's own workforce, see the ESRS S1 disclosures in Nokia's 2025 Annual Report (pp. 144–151).

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<sup>1</sup> For the purposes of this statement, Nokia refers to Nokia Corporation, a company incorporated under the laws of the Republic of Finland, with its seat at Karakaari 7 FI-02610 Espoo, Finland, and to its subsidiaries, including, for purposes of various jurisdictions, the legal entities mentioned on the last page of this statement, under the headline "Attestation and other legal disclosures"

<sup>2</sup> Nokia 2025 Annual Report <https://www.nokia.com/system/files/2026-03/nokia-annual-report-2025.pdf>

## 1.2 Nokia’s supply chain profile

### 1.2.1 Identifying the part of Nokia’s supply chain most at risk

Nokia drives active engagement across its value chain, working with its suppliers to raise the standards in its ecosystem in key environmental, social and governance (ESG) areas including labor rights and health and safety. Supplier due diligence is one of the four pillars of Nokia’s responsible sourcing strategy complemented by supplier development and learning and industry collaboration as key enablers for success.

In 2025, Nokia conducted business with around 9 800 suppliers in over 100 countries, and 80% of Nokia’s total supplier spend was distributed across approximately 340 suppliers.

Nokia’s suppliers fall into several broad categories: final assembly suppliers; hardware suppliers for product materials (e.g. standard components, optical components, semiconductors, electromechanics and radio-frequency (RF) accessories); market services suppliers who support the provision of services to Nokia’s customers e.g. in installation; construction and managed services; software; cloud services; and indirect sourcing suppliers for everyday goods and services needed to run Nokia’s business e.g. consulting, legal and marketing.

Nokia continues to work with Verisk Maplecroft, a global risk analytics company, for an independent view of the potential risks of modern slavery globally.

A list of Nokia’s largest strategic original design manufacturers (ODMs), original equipment manufacturers (OEMs) and component suppliers<sup>3</sup> is published on Nokia’s website to further increase stakeholder transparency. The listed suppliers accounted for approximately 50% of Nokia’s spend in 2025 for the manufacturing and/or production of our products and components.

Risk assessment of Nokia’s supplier profiles:

<b>Products/services category</b>	<b>Explanation</b>	<b>Modern slavery risk</b> (based on workforce skill level, risk of informal employment, etc.)
Market support services	Includes site installation and construction, managed services, technical support services, and external workforce services.	High
Indirect sourcing	Includes tax, consulting, financial, legal, marketing, business process outsourcing (BPO), business services, training, HR operations and benefits, health and safety, travel and fleet, and events services.	Low
Electromechanics and radio frequency (RF) accessories	Includes cable and connector assembly, printed circuit boards (PCBs), power systems, RF filters, metals, and subracks.	High

<sup>3</sup> Nokia Supplier List <https://www.nokia.com/about-us/sustainability/sustainability-downloads/>

Manufacturing and delivery	Includes final assembly, original design manufacturer (ODM), repair and spares, logistics, warehousing, test equipment, and IT hardware. Includes vertical market solutions and incubation, original equipment manufacturer (OEM) software solutions, and platforms.	Medium
Optical components	Includes optical active discretives, optical passives, and optical transceivers.	Medium
Semiconductors	Semiconductors.	Low
Standard components	Includes analog and standard components, RF and timing, and computational components.	Medium
IT hardware, software and services	Includes IT hardware, IT infrastructure and security managed services, enterprise application development and maintenance services, software, and Software-as-a-Service (SaaS), and IT consulting and telecom services: mobile voice, fixed voice, wide area networks (WAN), and data.	Low

Nokia collaborates closely with customers and suppliers to address systemic issues related to the environment, the misuse of technology (including advocating for responsible AI principles), ethics, human rights, and working conditions. This includes addressing issues such as responsible sourcing of minerals, climate, circularity and labor rights in the lower tiers of its value chain as well as understanding and responding to stakeholder sustainability expectations, supported by supplier development, and industry collaboration.

Nokia has conducted an analysis of the impacts and risks related to the working conditions and other work-related rights of workers in lower tiers of Nokia’s value chain. Nokia acknowledges that its visibility into the labor supply chain, specifically how workers are recruited at different stages, the source and transit countries of migrant workers, and the involvement of labor intermediaries remains an area for continued development. Results of this analysis are covered on page 152 of Nokia’s 2025 Annual Report.

## 2 Nokia’s policies and practices

### 2.1 Nokia’s Code of Conduct and related policies and procedures

Nokia is committed to upholding the laws and regulations in all countries where it operates.

Nokia’s Nokia Code of Conduct<sup>4</sup> outlines standards for ethical behavior by Nokia employees and business partners. The Code of Conduct includes Nokia’s basic principles of business conduct and high-level policy statements related to risk areas that are

<sup>4</sup> Code of Conduct <https://www.nokia.com/about-us/code-of-conduct/>



covered in more detail in separate policy documents and standard operating procedures (SOPs). The Code of Conduct explains how compliance is a commitment and responsibility shared by all Nokians.

Nokia's Code of Conduct, People Framework, Human Rights Policy<sup>5</sup>, and local employment laws, policies and practices are the basis for its labor conditions.

Nokia is aligned with key elements of the SA8000 Social Accountability Standard. Nokia's policies<sup>6</sup>, SOPs, and the Code of Conduct are applicable to its employees as well as its suppliers.

Nokia's policies and SOPs cover:

- Zero tolerance for child and forced labor
- Responsible recruitment and exit
- Prohibition of worker-paid recruitment fees
- Prohibition of document retention or confiscation of identity documents
- Freedom of association and collective bargaining
- Worker-management communication
- Non-discrimination
- Humane treatment
- Working time
- Disciplinary practices
- Compensation and remediation
- Occupational health and safety
- Freedom of movement

For detailed information on Nokia's governance structure for this type of sustainability matters, see the ESRS 2 General Disclosures in Nokia's 2025 Annual Report (pp. 88–108).

## 2.2 Nokia's Human Rights Policy

Nokia believes that connectivity is a social good that can empower individuals and communities; facilitate freedom of expression, privacy, and security; and support positive social, economic, and cultural development.

The Nokia Human Rights Policy outlines Nokia's commitment to respect and support internationally recognized human rights, as expressed in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights) and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Nokia's approach to human rights due diligence and remediation is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs). As guided by the

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<sup>5</sup> Human Rights Policy <https://www.nokia.com/sites/default/files/2025-12/nokia-human-rights-policy.pdf>

<sup>6</sup> Nokia's policies <https://www.nokia.com/we-are-nokia/leadership-and-governance/policies/>

UNGPs, Nokia also utilizes international human rights instruments that set out the rights of children; women; persons with disabilities; national, ethnic, religious and linguistic minorities; and migrant workers and their families.

Nokia respects standards of international humanitarian law in situations of armed conflict.

Nokia does not tolerate the use of forced, compulsory or child labor, human trafficking, or any form of slavery in any part of its operations or supply chain. Nokia supports non-discrimination, responsible sourcing, and responsible innovation, including the ethical development and responsible use of technology and AI. Nokia applies mandatory downstream due diligence to all solution sales. The policy is approved by the CEO and was updated during FY2025, the new version being published in December 2025. Changes were informed by evolving regulatory requirements and stakeholder feedback.

## 2.3 Nokia's Global People Framework

Nokia's Global People Framework summarizes the core People principles applicable to everyone at Nokia – including directors, officers and employees – and all companies and controlled joint ventures that are part of the Nokia Group.

Nokia meets or exceeds the standards set out by local labor laws and regulations. Nokia respects the dignity and rights of all individuals, regardless of their personal characteristics, including age, disability, sex, gender identity, gender characteristics or expression, sexual orientation, race, religion or beliefs, marital or civil partnership status, pregnancy, or parental status. Nokia strictly prohibits all forms of bullying, harassment, discrimination and retaliation. These commitments are set out in Nokia's Code of Conduct, which expressly outlines the expected standards of behavior for everyone at Nokia.

## 2.4 Zero tolerance for child and forced labor

Nokia has zero tolerance for, and strictly forbids, any form of child labor and all forms of forced, bonded or imprisoned labor in both its own operations and its supply chain.

## 2.5 Freedom of association and collective bargaining

Nokia respects employees' rights to freedom of association and collective bargaining in accordance with applicable laws and internationally recognized labor principles. Collective bargaining agreements are negotiated at local level. In many countries where such agreements are in place, their scope and coverage are determined by local law and established practice and may extend beyond union members. Employees are free to join, not join, or leave unions or other representative bodies, and to choose their representatives without retaliation or discrimination.

Nokia encourages active, open communication and constructive dialogue with employees and, where applicable, their elected or union representatives.

## 2.6 Supplier-related policies and practices

Nokia recognizes that purchasing practices can influence modern slavery risk in supply chains. Nokia strives to ensure that its supplier-related policies and practices do not create conditions that may contribute to forced labor, or other forms of exploitation in its supply chain.

In addition to Nokia's policies, SOPs, and Code of Conduct being applicable to its suppliers, Nokia also expects suppliers to adhere to the Nokia Third-Party Code of Conduct<sup>7</sup>. Nokia also provides them with Nokia Supplier Requirements<sup>8</sup>, including the latest Responsible Business Alliance's (RBA)<sup>9</sup> Code of Conduct and additional Nokia-specific sustainability requirements to be met.

Nokia requires its suppliers to uphold its policies and share the overall values expressed in its Third-Party Code of Conduct without any obstruction or discouragement. To demonstrate their commitment to respecting human rights and ethical business conduct, Nokia expects its suppliers to have relevant management systems and resources in place, as well as a company code of conduct. Nokia conducts regular, robust assessments with its supplier network to support them in meeting Nokia's ethical, labor and human rights standards and improving performance where necessary.

## 2.7 Implementation and cascading of supplier requirements

Nokia labor-related requirements for its suppliers are based on international standards such as the UN Universal Declaration of Human Rights, the International Labor Organization Core Conventions and the SA8000 Social Accountability Standard. These requirements include working time, overtime, leave, compensation and benefits as well as modern slavery risk and forced labor prevention and are covered under Nokia's Supplier Requirements, which include the requirements from the latest version of the RBA Code of Conduct as well as Nokia-specific supplier requirements in addition to the RBA industry Code. An overview of Nokia's Supplier Requirements is published on Nokia's website and is made available to all stakeholders.

These Supplier Requirements are cascaded down to suppliers as part of qualification and contracting, as well as supplier training. Nokia expects its suppliers to further cascade these requirements to the next tier of suppliers.

Nokia's Supplier Requirements are also regularly reviewed based on evolving industry standards such as the SA8000 Social Accountability Standard, or in relation to the codes of organizations such as the RBA<sup>10</sup> and the Joint Alliance for Corporate Social Responsibility (JAC).<sup>11</sup>

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<sup>7</sup> Third-Party Code of Conduct <https://www.nokia.com/about-us/code-of-conduct/third-party-code-of-conduct/>

<sup>8</sup> An overview of Nokia supplier requirements on sustainability <https://www.nokia.com/about-us/sustainability/sustainability-downloads/>

<sup>9</sup> Responsible Business Alliance Code of Conduct <https://www.responsiblebusiness.org/code-of-conduct/>

<sup>10</sup> The Responsible Business Alliance (RBA) <https://www.responsiblebusiness.org/>

<sup>11</sup> Joint Alliance for Corporate Social Responsibility (JAC) <https://jointallianceforcsr.org/>

## 2.8 Child and Forced Labor Remediation Process

As stated earlier, Nokia has zero tolerance for and strictly forbids any form of child labor and all forms of forced, bonded or imprisoned labor in both its own operations and its supply chain. Where such a potential risk is identified, it is thoroughly investigated, and a remediation plan is put in place based on the SA8000 Social Accountability recommendations.

Nokia's comprehensive global remediation guideline established in 2015 and revised in 2023 and 2024 applies across all operations and supply chain, prioritizing immediate victim safety and well-being. When a suspected case is identified, Nokia implements a three-phase process:

- I. Immediate welfare - ensuring physical safety, freedom from retaliation, removal from harmful work, and for child labor cases, contacting parents/guardians; for forced labor, demanding return of identity documents
- II. Formal investigation - conducted by Nokia's Investigations Group to determine root causes, prevent future incidents, and hold parties accountable; and
- III. Remediation - all substantiated child labor cases and significant forced labor cases are addressed by a multi-stakeholder team including business groups, HR, sustainability, legal, and optionally local NGOs/experts, who consult with victims and families to develop customized remediation plans that may include payment of owed wages, reimbursement of recruitment fees, educational support, medical assistance, and safe housing, formalized through written agreements with ongoing monitoring to prevent re-victimization.

Cases requiring significant operational changes are escalated to the Head of Human Rights for Human Rights Due Diligence (HRDD) Council consideration.

This process aligns with UN Guiding Principles on Business and Human Rights, ILO conventions, OECD Guidelines for Multinational Enterprises, RBA Code of Conduct, and applicable modern slavery and forced labor legislation requirements.

## 3 Supplier engagement, supply chain due diligence and training

### 3.1 Supplier engagement

Nokia actively engages with its suppliers to promote responsible sourcing practices in key sustainability areas, including environmental issues, health and safety, labor rights, ethical behavior and conflict-free sourcing. The company's responsible sourcing program focuses on supplier due diligence, climate action, circularity, and responsible minerals sourcing.

Nokia collaborates with the RBA and JAC, which comprise some of the world's largest telecom operators to assess and further develop these programs.

In 2025, the Nokia Supply Chain Sustainability team spoke at several RBA Outreach meetings in New Delhi and Brussels, as well as the JAC Supplier Forum in Hong Kong and the EcoVadis World Tour Nordics session in Stockholm. These outreach meetings were also promoted among Nokia's suppliers.

## 3.2 Risk assessment and risk management

Responsibility for identifying, assessing and responding to modern slavery risks within Nokia rests with the Vice president and Global Head of Sustainability, supported by the Supply Chain Sustainability team. The Nokia Sustainability Council and the Sourcing Council provide senior-level oversight, and modern slavery risk is reported to the Board of Directors of Nokia through the sustainability governance framework described on page 89 of Nokia's 2025 Annual Report.

Nokia's internal analysis and enterprise risk management process help identify potential supply chain risks. Nokia carries out more in-depth analyses to determine key supply chain risks via its dedicated internal Supplier Sustainability Risk Dashboard, where it looks at various sustainability risks, commodity risks, etc. on a supplier location level. The outcomes are included in Nokia's purchasing category strategies related to type and size of supplier, in addition to its monitoring- and performance-related requirements. Nokia reviews category strategies annually with its purchasing category leads, as well as supplier location and business context. This approach helps ensure responsible purchasing practices across the company.

## 3.3 Supplier Due Diligence and audit program

Nokia conducts regular assessments with its suppliers to help them understand and meet Nokia's ethical, labor and human rights standards and identify areas of improvement as needed. Nokia's 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.

Nokia's supplier-related monitoring, assessment and auditing activities also include EcoVadis assessments. These online assessments include evaluations of a supplier's policies and controls relating to working time and leave, remuneration, recruitment and forced labor prevention. Responses are scored by an independent analyst, and based on the findings, corrective actions are identified and followed up with suppliers.

Nokia conducts in-depth corporate responsibility audits covering labor conditions and environmental management for its existing suppliers. Implementation of these audits is aligned with the SA8000 methodology, and covers document reviews, interviews with managers and employees, and site visits, as well as inspections of facilities, production

lines, and warehouses. Nokia’s audits include tier 1 and tier 2 suppliers, and Nokia expect and require its suppliers to audit their next-tier suppliers.

Nokia’s corporate responsibility auditors undergo 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 2025, Nokia conducted a total of 788 supplier audits and EcoVadis assessments. These included 121 in-depth corporate responsibility audits. There were 20 countries covered by these audits, including China, India, Japan, Malaysia, Mexico, Singapore, Thailand, the Philippines and Vietnam. Beyond in-depth audits, 616 online assessments with EcoVadis were also completed. Compared to FY2024, the number of audits and assessments increased by 182.

Nokia reports publicly on the types and numbers of audit findings as well as corrective actions taken in its 2025 Annual Report.

Nokia also continues the monthly monitoring of working hours, days off, and contractual labor usage on a factory level for Nokia’s key final assembly suppliers.

Key performance indicators (KPIs)	Annual Report page ref.
Corporate sustainability audits and assessments in 2025	p. 154
Examples of audit findings and corrective actions taken	p. 154

### 3.4 Employee training and capability building

Nokia supports, maintains and continually enhances its employees’ knowledge of compliance through mandatory training and regular communications highlighting its significance. Nokia’s corporate culture of integrity is reinforced by a comprehensive compliance training program, including the Ethical Business Training course, which is required annually for all employees. It includes a review and acknowledgment of Nokia’s Code of Conduct and the related policy areas. In 2025, 98% of Nokia’s employees completed the Ethical Business Training module, surpassing the target of 95%. Additionally, a refreshed internal training on responsible sourcing was introduced to further emphasize Nokia’s commitment to ethical business practices. Page 175 of Nokia’s 2025 Annual Report further details Nokia’s ethics and anti-corruption training, including the target audience, training topics and frequency.

In addition, specific in-depth training is provided on several important topics. For example, Nokia Life Saving Rules<sup>12</sup> represent the safety guidance to ensure everyone gets

<sup>12</sup> Nokia Life Saving Rules <https://www.nokia.com/suppliers/health-safety/life-saving-rules/>

home safely, every day. The guidance includes six simple safety rules related to the top three risk areas for Nokia: road safety, working at height and electrical safety. Everyone working for Nokia must follow these rules as an absolute minimum.

### 3.5 Supplier training and guidance for on-site personnel

Engagement and interactions with suppliers' employees are also conducted via supplier training (on-site workshops and webinars). By improving competencies and transparency around labor conditions and workers' rights, health and safety, environmental impact, and conflict-free sourcing, Nokia can better address the risks and facilitate the competent development of its suppliers. Supplier training content is reviewed annually and updated based on audit findings and evolving risk assessments.

In 2025, Nokia continued to develop supplier capabilities around audit findings through supplier webinars as well as onsite workshops in India and China, covering topics such as modern slavery, labor migration and ethical recruitment, responsible minerals sourcing, climate change, circular practices and health and safety. Nokia suppliers also benefit from industry-wide training programs and training materials that are made available through the EcoVadis Academy, the RBA Academy and the CDP.

As a key component of its supply chain sustainability approach, Nokia carefully tracks working conditions. Nokia places special emphasis on health and safety as part of its supply chain. The Nokia Life Saving Rules are also applicable to Nokia's subcontractors and suppliers, who must follow these rules as an absolute minimum.

A key control measure in enabling on-site work to be done safely is ensuring that everyone is authorized, has appropriate competence and is fit to work. This is supported by Nokia's health and safety digital control procedures, which address supplier capability at initial engagement, review their procedures at the start of each project, and monitor compliance through AI-supported tools and automated end-to-end workflow controls. Nokia has 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. For incidents related to child and forced labor Nokia also has a dedicated Child and Forced Labor Remediation process.

## 4 Addressing specific supply chain risks

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

Modern slavery and forced labor remain a challenge for countries and supply chains. Nokia has robust supplier audit and assessment processes and procedures in place. Nokia continues 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.

## 4.2 Addressing conflict minerals risks

A key area of Nokia's work with its supply chain is the ongoing identification and mitigation of potential risks in the mining, extraction and trade of metals that provide key minerals for electronic components. Risks include military conflict, human and labor rights violations, and damaging impacts to the environment. The traceability of Nokia's materials and ensuring that its products are conflict-free are a priority, as reflected in Nokia's Responsible Minerals Policy.<sup>13</sup>

Nokia aims to contribute to a long-term solution to the issue of conflict minerals, one that ensures responsible and conflict-free sourcing via legitimate trade, and that brings sustainable improvements in the countries where the risks are greatest. Nokia requires that its suppliers commit to sourcing materials from environmentally and socially responsible sources. Materials that either directly or indirectly contribute to conflict are unacceptable.

As part of its work to ensure conflict-free minerals, Nokia collaborates with industry peers through the Responsible Minerals Initiative<sup>14</sup> and the Public-Private Alliance for Responsible Minerals Trade. Nokia's due diligence approach is aligned with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals.

Nokia encourages smelters to participate in the Responsible Minerals Assurance Process (RMAP) audit to underscore and validate their status as conflict-free smelters with respect to tin, tantalum, tungsten and gold in Nokia's products. In 2025, Nokia achieved a 67% validation level. A further 16% of smelters can reasonably be considered conflict-free based on Nokia's due diligence efforts.

Nokia has asked its suppliers to phase out smelters that were not part of the industry assurance program, or that were not evaluated as "low risk." Engagement with such smelters over recent years does not seem to have motivated them to collaborate, and Nokia cannot rule out that this is because they are potentially engaging in non-compliant practices. Therefore, requesting from its suppliers the phase-out of such smelters is the only acceptable alternative for Nokia.

Nokia also undertook due diligence for cobalt, mica, copper and aluminum in its components based on extended minerals material declarations for product parts. Nokia

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<sup>13</sup> Nokia Responsible Minerals Policy <https://www.nokia.com/sites/default/files/2026-03/nokia-responsible-minerals-policy.pdf>

<sup>14</sup> Responsible Minerals Initiative <https://www.responsiblemineralsinitiative.org/>

engaged with 94 relevant suppliers about its requirements regarding cobalt and requested they exercise due diligence over the cobalt supply chain. Nokia also engaged in due diligence with 26 suppliers for mica, 105 suppliers for copper and 30 suppliers for aluminum. As a result, Nokia identified 95 cobalt, 30 mica, 72 copper and 1 aluminum smelters in its supply chain, out of which 62 cobalt, 6 mica, 65 copper and 0 aluminum had gone through the Responsible Minerals Assurance Process (RMAP) or equivalent third-party audit program and had been evaluated as “low risk.”

For upstream engagement Nokia continued its work with the Public-Private Alliance for Responsible Minerals Trade and contributed to the development of in-region programs. Nokia has also provided training to its in-scope suppliers to ensure that requirements are met and risks understood and mitigated.

### 4.3 Enhancement of procurement processes

Nokia regularly evaluates the performance of its suppliers through multiple sustainability programs. Nokia’s key supplier-related monitoring, assessment and auditing activities include an on-site corporate responsibility audit program, EcoVadis sustainability assessments, the CDP Supply Chain Climate Change assessment, and the Conflict-free Minerals Program.

Within its purchasing category strategies, Nokia sets performance requirements for suppliers to achieve or maintain “preferred” and/or “allowed” status across performance categories. Suppliers that do not meet performance requirements are re-evaluated, and follow-up actions are decided depending on the circumstances.

## 5 Reporting concerns and speak-up culture

Nokia is committed to maintaining a culture in which its employees, and individuals working for its partners, feel safe raising concerns about suspected violations of Nokia’s Code of Conduct and policies, and applicable laws and regulations. Nokia also takes a zero-tolerance approach to retaliation in all forms, and will not tolerate any adverse treatment of an employee or partner (to the extent that it is reasonably within Nokia’s control for a non-employee) who raises a concern in good faith or provides evidence in support of such a concern.

Nokia offers multiple channels for its internal and external stakeholders to report ethical concerns or suspected violations.

The main channel for Nokia’s value chain workers to raise concerns related to their employer should be their employer grievance channels. The supplier’s compliance of employer grievance channels with Nokia’s Supplier Requirements is included in the scope of Nokia’s supplier audits. Besides their own reporting channels, concerns can also be



raised through the Nokia Ethics Helpline, as well as via worker interviews that are conducted as part of supplier audits and site inspections. Nokia also promotes a speak-up culture in supplier webinars.

The Nokia Ethics Helpline allows reports via an online portal that is available to the public and a call center with multiple language options. These services are administered by a third-party software provider, Case IQ. Reports and conversations are confidential, and those reporting concerns may remain anonymous, if they wish. In addition, reports can be submitted by any party to the Nokia Ethics email account.

Employees also have the option of reporting concerns directly to their line manager, Human Resources representative, a member of the Legal, Compliance & Sustainability team, or any Ombuds leader. Ombuds leaders are neutral and confidential resources that provide a safe space to speak up about compliance questions, concerns and requests for guidance. The Ombuds network acts as a supplemental resource to help and support employees.

Nokia also maintains internal and external web pages dedicated to concern-raising and whistleblowing resources.

In 2025, a total of 884 concerns were raised through Nokia's ethical reporting channels, of which 55 were related to working with third parties.

More information on grievances and the investigations carried out can be found in Nokia's 2025 Annual Report (pp. 169–175).

#### **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 2025 audit results

### 6.1 Increasing supply chain transparency

As a global company with operations around the world, Nokia strives for increased transparency in all areas of sustainability reporting. In March 2026, Nokia published its Annual Report for fiscal year 2025 in which findings from Nokia's in-depth corporate responsibility supplier audits were reported.

In 2025, Nokia's audits identified two findings regarding child and young labor risk. In one of the instances, a young worker was assigned to night shifts and overtime, and in another case, there was a missing pre-employment health check for young workers. As

part of the corrective actions, the supplier updated its young workers' related protection procedure and retrained staff.

Additionally, Nokia uncovered 41 findings related to forced labor, as set out below.

- I. **Recruitment Practices:** This comprised one of the largest clusters of nonconformances (14 findings), particularly affecting migrant workers. Workers were found to have paid prohibited recruitment and hiring fees, in some cases amounting to over 100% of their monthly gross wage. These fees covered items such as medical checks, passport renewals, transportation, and security deposits – costs that should never be borne by workers under responsible recruitment standards. Beyond fees, recruitment systems lacked effective controls: job advertisements were incomplete, missing key required elements such as wage clarity, overtime rates, grievance channels, and “no fees” assurances. Predeparture orientations often excluded essential information like emergency contacts, and due diligence on recruitment agents was insufficient or absent.

Corrective actions included factories rolling out reimbursement programs to workers, terminating partnerships with non-compliant recruitment agencies, and introducing new recruitment process flows aligned with the RBA's Definition of Fees. Job advertisement templates were updated to include all required disclosures, and pre-departure training was strengthened with missing content and attendance controls. Vendor training on forced labor requirements was also significantly expanded.

- II. **Labor Contracts:** There were nine findings, few of which related to labor contracts omitting legally required components such as overtime terms, wage deduction methodologies, leave entitlements, and grievance channels. In several cases, contracts were not provided in a language the worker understands – for example, a Japanese-only contract was given to a Filipino worker. There were also findings related to fixed term contracts used for permanent roles (or imposed illegal clauses like noncompetition agreements) in Taiwan.

Corrective actions included the review of contract templates, the translation of contract agreements into native languages and the implementation of comprehension checks. Illegal noncompete clauses were removed, and fixed-term workers began transitioning to permanent status through a phased program.

- III. **Dispatch worker limits:** There were eight findings related to a supplier relying heavily on dispatch labor exceeding the 10% legal thresholds. Dispatch/contract labor agencies were found to be using unlawful contract terms, including imposing unfair wage conditions and excluding workers from social insurance, as well as failing to provide workers with copies of their contracts.

Corrective actions required the agencies to fix contract formats, ensure that workers received copies of their contracts, and develop transition plans to shift from dispatch to direct employment.

- IV. **Retention of employee documents:** One of the two findings was regarding the recruitment agents of a supplier retaining workers' passports, birth certificates, marriage certificates, and education certificates for up to two months and in the second case, an employer keeping an original education certificate for six months.

Corrective actions included the termination of non-compliant recruitment agents and the updating of policies to explicitly prohibit document retention. These requirements were also integrated into predeparture briefings and foreign worker onboarding. The HR department was tasked with verifying document return and implementing a passport tracking system.

- V. **Gaps in final settlement and employment termination documentation:** There were four findings primarily due to a lack of exit documentation such as termination letters, resignation forms, final settlement calculations, and payment proofs.

Corrective actions involved the supplier rolling out structured exit processes including recordkeeping procedures, settlement checklists and enhanced HR governance systems to ensure compliance going forward.

- VI. **Worker loans as high risk of debt bondage:** There were two nonconformities related to loans provided to workers where repayment practices exceeded acceptable limits or had added interests applied.

Corrective actions included internal guidelines on loan and loan management as well as capping the repay amount and eliminating added interests.

Nokia has followed up on key areas of concern and findings related to forced labor, resulting in the closure of the majority of these issues during the first quarter of 2026. For the few remaining items, engagement with the supplier is maintained to ensure the issues are fully resolved without delay.

None of the measures implemented by Nokia in FY2025 to address forced labor or child labor risks resulted in a loss of income for vulnerable families. In accordance with Nokia's Child and Forced Labor Remediation Process described in section 2.8 above, remediation plans are developed in consultation with affected individuals and their families and are designed to safeguard the economic well-being of vulnerable individuals. Corrective actions implemented during FY2025, including the reimbursement of prohibited recruitment and hiring fees to affected workers, payment of owed wages, provision of support, and termination of non-compliant recruitment agents, were specifically

structured to restore and protect the income and livelihood of impacted workers and their families rather than to diminish them.

Nokia continues to assess opportunities to improve its processes and supplier engagement efforts so that any potential lessons learned can be fully integrated into future ways of working.

## 6.2 Assessing the effectiveness of Nokia's actions

In 2025, Nokia continued to report against its long-term Sustainability targets, provided examples of corrective actions and KPIs in its 2025 Annual Report, and followed up on issues uncovered in supplier audits to ensure continued adherence. Suppliers that fail to address audit findings within six months negatively affect their performance evaluation, as their audit score is lowered. These mechanisms are also used to assess the effectiveness of Nokia's actions to prevent and address modern slavery.

Supply chain workers are engaged through worker interviews during corporate responsibility audits to ensure their voice is included, and Nokia Ethics Helpline channels are open for all individuals and stakeholders, including our suppliers' employees, to flag concerns. Nokia disclosed examples of findings from its in-depth corporate responsibility supplier audits on page 154 of Nokia's 2025 Annual Report.

### 6.2.1 Monitoring and evaluation governance

The Vice-President and Global Head of Sustainability is responsible for setting and tracking KPIs. Progress is reported at least annually to the Sourcing Council, Sustainability Council and to the Board of Directors. For details on Nokia's sustainability governance structure, see the ESRS 2 disclosures on page 89 of Nokia's 2025 Annual Report.

## 7 Collaboration and future outlook

In 2025, Nokia continued its collaboration with several key organizations that focus on corporate responsibility in global supply chains. As a member of the RBA, Nokia participated in workstreams covering labor rights and environmental issues.

Nokia also continued its collaboration with the JAC, an association of telecommunications operators (Nokia's customers) that aims to verify, assess, and develop corporate responsibility implementation across the manufacturing centers of multinational suppliers in the ICT sector. JAC's membership increased in 2025 and now includes 31 of the world's largest 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 2025, Nokia conducted 121 in-depth



corporate responsibility supplier audits, the majority of which were conducted through either the RBA Validated Assessment Program (VAP) audits or the JAC framework.

### **Global Network Initiative (GNI)**

Nokia is a board member of the Global Network Initiative (GNI), a multi-stakeholder initiative comprising companies, investors, academics and civil society organizations that promotes respect for freedom of expression and privacy in the ICT sector through shared principles and independent accountability.

Participating companies are independently assessed every two to three years on their implementation of the GNI Principles, with a focus on downstream due diligence and the practical operation of human rights due diligence processes.

Nokia was the first telecommunications equipment vendor to complete a GNI assessment in 2019 and has since completed three independent assessments, most recently in 2026, with positive outcomes. Each assessment was conducted by a GNI-accredited external assessor and reviewed by GNI's multi-stakeholder Board. In its most recent assessment, the independent assessor noted that human rights considerations are embedded within Nokia's key business functions and that awareness of freedom of expression and privacy risks is well integrated across commercial and technical functions. GNI's assessment methodology and public reporting are publicly available.

Nokia aims to keep its robust due diligence approach, processes and procedures at the current high standard, while seeking to continually improve its ways of working, and driving for increased vigilance.

Nokia will intensify its engagement with suppliers on modern slavery and human rights, expecting clear accountability and concrete action to identify, address and eliminate any modern slavery risks across the supply chain.

This Statement covers Nokia's financial year 2025.

## 8 Attestation and other legal disclosures

This Statement applies to Nokia Corporation and its subsidiaries and has been prepared and is intended to meet Nokia's reporting obligations under various acts in several jurisdictions, as listed below.

### **Australia**

Under the Modern Slavery Act 2018 (Cth) and NSW Modern Slavery Act 2018 (NSW Act), the reporting entity for the purposes of this Statement in Australia is Nokia Solutions and Networks Australia Pty Limited (NSN Australia). This Australian entity is a fully integrated entity within the Nokia global group and aligns with all Nokia's global policies and practices. NSN Australia is a subsidiary of Nokia Corporation, with its head office in Sydney and local offices in Melbourne and Perth. Nokia Australia does not manufacture any products but rather operates as a supplier of telecommunications and connectivity equipment, software and services. Its supply chains are therefore aligned with Nokia's global supply chain and are set out at section 1.2 of this statement.

During the preparation stage of this Statement, a representative of the Board of Directors of Nokia Solutions and Networks Australia Pty Limited was consulted and given the opportunity to input and ensure that the modern slavery risks relating to NSN Australia (if any) were appropriately identified, assessed, and addressed. NSN Australia's board and senior management are aware of the content of this global Statement and are aligned with its contents.

### **Canada**

This statement is intended to meet Nokia's reporting obligation under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. Nokia provides this statement on behalf of Nokia Solutions and Networks Oy and Nokia Canada Inc. For the purpose of, and in accordance with, the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, Nokia Canada Inc. and Nokia Solutions and Networks Oy are considered an 'entity' under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and make this statement as a single statement pursuant to section 11. For the purpose of the relevant approval and signing requirements, this modern slavery statement has been approved by the governing body of Nokia Solutions and Networks Oy and has been signed by a director. Nokia Canada Inc.'s board and senior management are aware of the content of this global Statement and are aligned with its contents.



## **Norway**

Nokia also publishes a separate statement under the Norwegian Transparency Act (Apenhetsloven), which covers Nokia Norway's human rights due diligence processes in relation to both fundamental human rights and decent working conditions. The Norwegian Transparency Act Statement will be published at Nokia.com.

## **United Kingdom**

The following Nokia affiliates must report for the purposes of the United Kingdom's Modern Slavery Act of 2015: Nokia UK Limited; Nokia Solutions and Networks Oy and Infinera UK.

## **United States**

### **California**

This statement is intended to meet Nokia's reporting obligations under the California Transparency in Supply Chains Act 2010.

Nokia and its subsidiaries share the same core business operations and supply chains, policies prohibiting modern slavery, and supporting processes described above in this statement. The above statement covers Nokia's fiscal year ended December 31, 2025 ("FY2025").

The Board of Directors of Nokia Solutions and Networks Oy, for itself and the Nokia affiliates listed in this note approved this Statement on May 29, 2026.

Mikko Hautala

Chairman

Nokia Solutions and Networks Oy

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## **Attestation for purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act**

In accordance with the requirements of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (“the Act”), and in particular section 11 thereof, I, in the capacity of Vice President Sustainability, attest that I have reviewed the information contained in the report titled “Modern Slavery Statement 2025” issued on behalf of the governing body of Nokia Solutions and Networks Oy and Nokia Canada Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

*I have the authority to bind Nokia Solutions and Networks Oy and Nokia Canada Inc.,*

Date: May 29, 2026

Subhagata Mukherjee  
Vice President of Sustainability  
Nokia Group