

March 2017

## Nokia Group Human Resources Policy

### 1 Policy Statement

Nokia must be an employer of choice — and its employees represent Nokia's future. Our employees are the most critical asset in the knowledge-based industry and we develop, engage, reward and retain all of our employees according to consistent, fair and transparent practices along their entire employment life cycle.

Nokia cultivates a globally diverse workplace culture of respect, where challenging opportunities for individual and collective renewal, achievement and growth abound.

We publish for our employees and managers Standard Operating Procedures (SOP's) and Guidelines for their internal employment-related decision-making.

### 2 Scope of the Policy

The Human Resources Policy applies to all employees (part-time/ full-time, on fixed or permanent employment) of Nokia Group entities. It does not apply to External Temporary Labor (agency workers or self-employed contractors) or employees of service providers.

All Human Resources SOP's and Guidelines are governed by and have to be in full alignment with this Policy. In case of conflict this policy prevails.

### 3 Our Commitments

#### 3.1 Commitment to our Values

We are fully committed to our Values, which are the primary driver for our proceedings and serve as the anchor for behavior for all employees in all situations.

## 3.2 Commitment to our HR Policy and HR SOP's

Our Employment standards are high and we do not waiver. Just because a particular legislation would allow or does not specifically forbid certain practices, our global policies still hold and we abide by them. This HR policy and the HR SOP's and HR Guidelines created under its realm are binding in all cases, as well as the governance for creating, reviewing and modifying them.

Legislation change may justify changes to or establishment of a HR Guideline, however, are not automatic and have to follow the review and approval procedure to reflect such changes.

## 3.3 Commitment to full legal compliance

In our recruiting, 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 wage & hour, privacy, immigration, compulsory and child labor, collective bargaining, anti-discrimination, working time and similar employment rules.

Every country regulates the workplace, and Nokia must ensure that appropriate employment practices and process are in place to comply with applicable employment and labor law. This is achieved by establishing country specific guidelines as necessary.

# 4 Authorizations and Approvals

Decision-making in Nokia is strictly defined in the respective SOP's with approval limits (e.g. financial or scope limitation of authority) and levels. It is every employee's responsibility to validate their own level of authorization prior to approving any request or making any decision. All such approvals and decisions have to be documented as described by the given SOP.

# 5 Implementation of this Policy

This Policy governs all the Human Resources processes and practices.

Processes and Practices regulated by HR will include but are not limited to:

- Compensation and benefits
- Internal Mobility
- International Mobility
- Recruitment

- Performance Management
- Talent Management
- Career Management
- Leadership Development
- Organizational Development
- Employment (e.g. leave of absence, work-time, remote working, unpaid time off, etc.)
- Disciplinary measures
- Grievance measures
- Executives Life Cycles

## 5.1 Standard Operating Procedures (SOPs)

The formal and approved regulation for implementing the Human Resources Processes and Practices is called a **Standard Operating Procedure**. All HR SOPs are global by definition – i.e. apply to all Businesses within Nokia.

SOPs are developed and maintained by the Nokia Global HR Center of Expertise (CoE). The Head of the appropriate Portfolio for the given process or practice is the owner. Final approver is the Nokia Global Head of HR.

## 5.2 HR Guidelines

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

**HR Guidelines** are developed by the HR CoE for the particular target group (e.g. Business or Region), final approvers are the Head of HR of the Business and the HR SOP owner in the global HR CoE jointly.