

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 slavery in any part of its global supply chain.

# Contents

- 1.0 Mapping our business and supply chain
- 1.1 Nokia business profile
- 1.2 Nokia supply chain profile

#### 2.0 Our Code of Conduct and related policies

- 2.1 Purchasing practices
- 2.2 Zero tolerance for child and forced labor
- 2.3 Freedom of association and collective bargaining
- 2.4 Human Resources Policy and other policies

#### 3.0 Due diligence and training

- 3.1 Driving improvement through training and capability building
- 3.2 In-depth training and guidance for on-site personnel
- 3.3 Finding a solution to conflict minerals
- 3.4 Enhancement of procurement processes

#### 4.0 Reporting concerns and speak-up culture

#### 5.0 Activities in 2022

- 5.1 Increasing supply chain transparency
- 5.2 Collaboration and looking forward

# Mapping our business and supply chain

#### 1.1 Nokia Business profile

At Nokia, we create technology that helps the world act together. We are a B2B technology innovation leader, pioneering networks that sense, think and act by leveraging our work across mobile, fixed and cloud networks. 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 patent, technology, and brand licensing programs.

Service providers, enterprises and 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** 

#### Net sales by region 2022



The majority of Nokia employees work in R&D, in the maintenance of network hardware and infrastructure, or in corporate roles including sales, legal, finance or other business support functions.

This Statement focuses on our supply chain where we see the greatest potential risk of forced or, bonded labor or other forms of modern slavery. We consider the risk of encountering modern slavery in Nokia's own operations as highly unlikely.

In 2022, Nokia changed the way it presents net sales information on a regional basis. Nokia believes that providing net sales for the Submarine Networks business separately from the rest of the Group improves the usefulness of disclosed information by removing volatility caused by the specific nature of the Submarine Networks business. The comparative information for net sales by region has been recast accordingly. This change did not otherwise affect the management's discussion of the year ended 31 December 2021 compared to the year ended 31 December 2020 included in the "Operating and financial review" section of the Annual report on Form 20-F for the year ended 31 December 2021.

The figures are derived from our consolidated financial statements prepared in accordance with IFRS. Year-on-year change is in parenthesis

All Nokia Technologies IPR and Licensing net sales are allocated to Finland.

#### 1.2 Nokia supply chain profile

#### Identifying the part of supply chain most at risk

In 2022, we conducted business with around 11 000 suppliers, and 80% of our total supplier spend was with approximately 300 suppliers around the world. Our suppliers fall into six broad types:

- Final assembly suppliers
- Hardware suppliers for product materials (e.g. standard components, optical components, semiconductors and, electromechanics)
- Market service suppliers who support the provision of services to our customers (e.g. in installation and construction)
- Managed services suppliers around the networks we sell
- IT suppliers
- Indirect sourcing suppliers for everyday goods and services we need to run our business (e.g. consulting, legal and marketing).

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 for an independent view of the potential risks of modern slavery globally. In 2022 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 2022 for the manufacturing and/or production of our products. See the list **here**.

### Risk assessment of our direct supplier profiles

Master category	Explanation	Modern Slavery Risk (based on workforce skill level, risk of informal employment, etc.)
Market Categories	Includes site installation and construction, managed services, technical support services, external workforce services.	High
Indirect Sourcing	Includes tax, consulting, financial, legal, marketing, business process outsourcing (BPO), business services, training, human resources operations and benefits, health and safety, travel and fleet, and events services.	Low
Electromechanics & RF Accessories	Includes cable and connector assembly, printed circuit boards (PCBs), power systems, RF filters, metals, subracks.	High
Manufacturing & Delivery	Includes final assembly, original design manufacturer (ODM), repair and spares, warehousing, test equipment, IT hardware.	Medium
Optical Components	Includes optical active discretes, optical passives and, optical transceivers.	Medium
E2E Solutions & Partnering	Includes vertical market solutions and incubation, original equipment manufacturer (OEM) software solutions, and platforms.	Low
Semiconductors	Includes semiconductors.	Low
Standard Components	Includes analog and standard components, RF and timing, computational components.	Medium
IT Procurement	Includes IT hardware, IT infrastructure and security, enterprise applications, software and software-as-a-service (SaaS), IT consulting and telecom services: mobile voice, fixed voice, wide area networks (WAN), and data.	Low

### Our Code of Conduct and related policies

We are committed to uphold the laws and regulations in all countries where we operate. Our Code of Conduct sets forth the key principles, values and standards that all employees are expected to follow. We support, maintain, and constantly improve our employees' knowledge of compliance through training and communicate regularly on its importance.

We offer multiple channels to report ethical concerns, including a dedicated email address, an online portal, and country-specific phone numbers. Our Nokia Ethics Helpline allows for anonymous reporting and is open to employees and external stakeholders. We respond to and investigate all concerns promptly, and establish remediation plans as needed.

Our Code of Conduct is the basis for our labor conditions and is underpinned by our Global People Framework along with local employment laws, policies and practices. We adhere to the United Nations Universal Declaration of Human Rights and the United Nations Global Compact. Wherever we

operate we strive to exceed the requirements of labor laws and regulations.

We are aligned with key elements of the social accountability standard SA8000. Our policies, standard operating procedures (SOPs), and Code of Conduct are applicable to our employees, as well as our suppliers. As a member of the Responsible Business Alliance (RBA) we expect our suppliers to comply with the RBA Code of Conduct.

#### Our policies and SOPs cover:

- Child labor avoidance
- Forced labor avoidance
- Freedom of association and collective bargaining
- Worker-management communication
- Non-discrimination

- Humane treatment
- Working time
- Disciplinary practices
- Compensation
- Occupational health and safety



#### 2.1 Purchasing practices

Our materiality analysis and enterprise risk management procedures help identify potential supply chain risks. We then carry out additional 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 supplier network to help them meet our ethical standards, and improve performance as needed. Our general audit covers the full set of supplier requirements, including corporate responsibility (CR) requirements, and is often used with new high-risk suppliers or suppliers where there has been significant change in business or location.

#### 2.2 Zero tolerance for child and forced labor

We have a strict policy against using child labor, and zero tolerance for all forms of forced, bonded, or imprisoned labor in our own operations and our supply chain.

## 2.3 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, employees who have chosen not to be members of a union are also covered by similar terms. Employees can freely choose to join, not join, or leave unions and associations, and can select their representatives based on local and international practices.

We encourage active, open communication and dialog with employees and/or their representatives.

#### 2.4 Human Resources Policy and other policies

As stated earlier, we have a strict policy against using child labor and zero tolerance for all forms of forced, bonded, or imprisoned labor. 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 wage and hours, privacy, immigration, compulsory and child labor, collective bargaining, anti-discrimination, working time and similar employment rules.

For Nokia, inclusion and diversity are a business imperative, as well as a platform for greater innovation, superior organizational performance, and excellent customer service. As a large, multinational company, we naturally have a very diverse workforce. But diversity is of little value if we are not making use of it.

Our Human Rights Policy reflects our expanded portfolio, and is available **here**. The policy addresses the impact of our products and services on free expression, access to information, exchange of ideas, and economic development. Policies related to other human rights, for example rights related to fair labor practices, modern slavery and human trafficking, environmental stewardship, and responsible minerals, are reflected in other company policies.

Nokia policies can be found here.

### Due diligence and training

We require our suppliers to uphold Nokia's policies and to share the overall values expressed in our 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, resources, and a company code of conduct in place. 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 2020, and we have adopted the **RBA Code of Conduct** requirements for suppliers in addition to Nokia-specific supplier requirements. We also communicated the requirements to our suppliers. An overview of these requirements can be found on our **website**.

We encourage our tier 1 suppliers (this includes both our final assembly suppliers, and our materials and services suppliers) to apply and cascade the same requirements to their own suppliers, which we aim to check through audits and EcoVadis online assessments. We require our suppliers to commit to these requirements as part of their contractual obligations. The requirements cover social, ethical, and environmental issues. 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 conduct in-depth Corporate Responsibility (CR) audits covering labor conditions and environmental management for our existing suppliers. Implementation of these audits is aligned with the SA8000 methodology, and they cover document reviews, interviews with managers and employees, 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 CR auditors are trained through the Social Accountability International (SAI) 5-day training course on the SA8000 standard which provides guidance on how to recognize issues. Experienced auditors further train new auditors and share knowledge and experience.

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.



### Due diligence and training

We continue to look closely at our top 20 final assembly factories through monthly monitoring on core labor KPIs: working hours, rest days and percentage of contracted labor.

In 2022, we conducted 479 (439 in 2021) supply chain audits and EcoVadis assessments. We carried out 67 in-depth CR audits (64 in 2021) at 41 supplier sites (28 in 2021). 379 (339 in 2021) suppliers were assessed using EcoVadis scorecards. There were 17 countries covered by these audits including China, India, Malaysia, Mexico, Morocco, The Philippines, Turkey, and Vietnam.

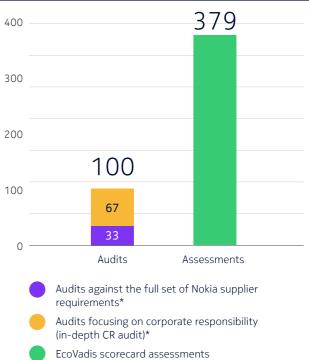
We report publicly on the types and numbers of findings from these audits in our annual People & Planet sustainability report.

We also continued monthly monitoring of the 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 detailed in our 2022 People & Planet report:



KPI	Nokia People & Planet report 2022 page no.
Details on CR audits and assessments in 2022	p.69
Details on suppliers participating in sustainability workshops and webinars	p.70
Examples of audit findings and corrective actions taken	p.71

#### Supply chain audits and assessments conducted in 2022



<sup>\*52</sup> of our supplier audits were conducted through our customers' Joint Audit Cooperation (JAC) framework or through Responsible Business Alliance (RBA) Validated Assessment Program (VAP) audits.

## 3.1 Driving improvement through training and capability building

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

In 2022, we continued to deliver supplier workshops online and were also able to conduct face-to-face workshops in our largest supplier markets including China and India after a pause of 2.5 years due to COVID restrictions. In total, we ran 11 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 also participate in supplier trainings. We also conduct mandatory Ethical Business Training for all our employees and require them to acknowledge the Nokia Code of Conduct. In 2022, our Ethical Business Training was completed by 98% of our employees.

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

## 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 our supply chain includes equipment installation and maintenance contractors who spend much of their time working at height, in confined spaces and drive long distances.

Ensuring that everyone is authorized, competent and fit to work is a key control measure in making sure that on-site work can be done safely. This is supported by our health and safety control procedures which address the suppliers' management capability upon initial engagement, enable reviews of procedures they have in place when they start working on a project and monitor compliance through onsite inspections. We have a mature and established global reporting and investigation process for incidents which includes any suspected instances of child, forced, or bonded labor and other forms of modern slavery.

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

Modern slavery and forced labor of all kinds remain a challenge for countries and supply chains. It is believed that the pandemic also worsened the issue as the vulnerable became even more so. In 2022, we also conducted an analysis of labor migration and its impacts 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. Our work includes advocating for greater dialog on non-discrimination of ethnic and other minorities.

We held further supplier training sessions in 2022 to communicate inclusion and diversity practices. We underscored our requirements concerning the treatment of ethnic groups or any other minorities. We also emphasized the appropriate actions to be taken by suppliers, and we monitor inclusion and diversity indicators in our EcoVadis due-diligence assessments with suppliers.

#### 3.3 Finding a solution to conflict minerals

A key area of our work with our supply chain is the ongoing potential risks identified in the mining, extraction and trade of metals that provide key minerals in electronic components. Risks include military conflict, human and labor rights violations and damaging impacts on the environment. The traceability of our materials and ensuring our products are conflict-free is a priority as reflected in our **Responsible Minerals Policy**.

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

As part of our work to ensure conflict-free minerals we collaborate with our industry peers through the **Responsible**Minerals Initiative and the Public-Private Alliance for Responsible Minerals Trade. In 2022, we continued our work with the Responsible Minerals Initiative to improve the traceability of minerals and ensure responsible sourcing. Our due diligence approach is aligned with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals.

We also encourage suppliers to participate in the Responsible Minerals Assurance Process (RMAP) audit to underscore and validate their status as a conflict-free supplier. In 2022 we achieved a 73% validation level. A further 14% of smelters can be reasonably considered as conflict-free based on our due diligence efforts.

Those smelters that were not part of the industry assurance program, nor evaluated as low risk, were asked to be phased out by our suppliers. Direct engagement with such smelters over recent years has not motivated them to collaborate, and therefore we feel there is a high likelihood that they are engaged in potentially non-compliant practices thus phase-out is the only alternative.

We also undertook a mapping of cobalt and mica in our components based on extended minerals material declarations for product parts. We engaged with 79 relevant suppliers about our requirements regarding cobalt and requested they exercise due diligence over the cobalt supply chain, with 19 suppliers addressed in regards to due diligence over the mica. As a result, we identified 71 cobalt and 17 mica smelters in our cobalt supply chain, out of which 59% (cobalt) and 18% (mica) have gone through the Responsible Minerals Assurance Process and qualified for either Conformant or Active status. In 2022, we undertook an assessment of our entire list of materials against 16 ESG risk categories and beyond 3TGs (tin, tungsten, tantalum and gold), cobalt and mica, and have started to map the mechanics supply chains related to copper, steel, nickel and aluminum. This requires working with multiple tiers of the supply chain.

For upstream engagement we continued our work with the Public-Private Alliance for Responsible Minerals Trade and contributed to the development of in-region programs. In 2022 we helped fund one of the local programs focused on expanding children's educational access and providing socioeconomic opportunities for their families and vulnerable women (including survivors of sexual violence). We also supported work on women's leadership and reintegration into communities following sexual violence closely related to minerals mining and the supply chain.



#### 3.4 Enhancement of procurement processes

We regularly monitor the performance of our suppliers through multiple sustainability monitoring programs including on-site audits, CDP (carbon disclosure) and EcoVadis assessments, the Supplier Health and Safety Maturity Assessment and the Conflict Minerals program which all contribute to our sustainability pillar in our supplier performance evaluation. We set performance requirements for suppliers to achieve or maintain Preferred and/or Allowed status across performance categories. Suppliers that do not meet the performance requirements are downgraded

### Reporting concerns and speak-up culture

We offer multiple channels for our internal and external stakeholders to report potential ethical concerns or 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, in good faith, raises a business, legal, or ethical concern, or cooperates with an investigation. The Nokia Ethics Helpline is operated by a third-party, i-Sight. Reports and conversations are confidential, and those reporting concerns can remain anonymous if they wish. In 2022, out of 1,033 concerns raised through the Nokia Business Ethics Helpline reporting channels, 79 concerned grievances relating to working with suppliers.

More information on grievances and the investigations carried out can be found on pages 59 through 60 in our **People & Planet sustainability report**.



### **Helpline information**

Email: ethics@nokia.com

**Phone:** https://nokiacms.i-sight.com/

portal/dialing-instructions

**Website:** https://nokiacms.i-sight.com/portal

### Activities in 2022

#### 5.1 Increasing supply chain transparency

As a global company with operations all around the world, it is our policy to aim for increased transparency in all areas of sustainability reporting. In March 2023 we published our **People & Planet sustainability report**, in which we again included several case examples of non-compliance in supply chain audits, and the actions taken to resolve those findings.

In 2022, our audits uncovered 15 cases related to non-compliance or the potential risk of forced labor.

A few of the cases concerned missing or inadequate documentation, such as a missing contract or appointment letters or missing content in the contract such as salary, working hours, and leave and benefit entitlements. There was also a case where contracts were not renewed after the fixed-term contract had ended. Most of these findings were addressed and closed, a few were still to be addressed in 2023.

Several cases concerned the recruitment process and the recruitment costs such as the cost of medical examination, COVID-19 testing or travel tickets that were initially borne by the migrant laborer in their home country and compensated only upon arrival into the destination country or as part of the first salary. This delay increases the potential risk of bonded labor. In one of the cases, supplier only supported partial return transportation cost back to their home country (flight but not ground transportation costs from the airport to the employee's residence). Such findings were addressed by setting up a process where transportation fees are to be paid

directly by the supplier or the labor agency, not by the worker. Nokia also highlighted these learnings from in its ethical recruitment webinar conducted for suppliers in 2022.

There was also an instance of involuntary overtime work detected among the on-site security service provider workers who performed involuntary overtime work for 2.5 hours every day for six consecutive days in a week. The supplier addressed this and obtained a memo from the managing director of the security company stating working hours, overtime and break time have been communicated to and acknowledged with a signature by every security guard.

Other cases included the auditee practicing an educational training bond (bonded labor) based on its training procedure which stated that workers who attend overseas training will be bonded for a period of six months up to a maximum of two years depending on the length of the training period. If the worker fails to serve the supplier after their training, the worker needs to pay back the training costs as per the training agreement signed between the employer and employee. The supplier verified that there were no cases of training bonds for workers and revised its training procedure at our request.

We also uncovered three (four in 2021) instances of non-conformity related to child labor avoidance. Cases included a missing child labor policy or missing identity cards which meant that the auditor could not immediately verify the worker's identity card. The suppliers took corrective actions by first developing a policy which also ensures worker files include a checklist requiring a copy of the identity card.

In April 2022, Nokia was notified, by a former business partner and employee of a supplier, of an alleged use of child labor and unsafe working practices by a subcontractor supplying services for a project between May and August 2021 in The Philippines. Nokia initiated its investigation process and immediately suspended the supplier from any further projects. Despite our best efforts, the potential victims could not be identified mainly due to the lack of documentation from the supplier. Although the supplier denied the allegations, evidence was gathered including professional medical opinion concerning the likely age of some individuals shown in received photo evidence. In the absence of certainty relating to some of the actual facts and circumstances, Nokia believes it is prudent to conclude that there may well have been a breach of Nokia's Code of Conduct, and Human Rights Policy, related to the zero tolerance for child or forced labor of any kind in its own or supplier operations.

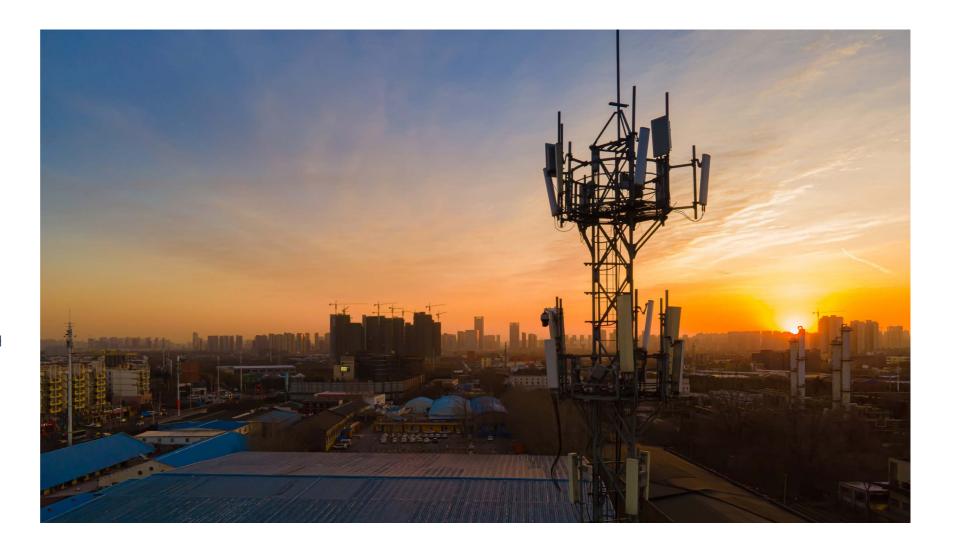
Nokia made the decision to permanently block the supplier in question and any future supplier linked with the owner. For this case a remediation committee was established. As we could not conduct mitigation directly, we took a broader approach to help address one of the root causes for children and young people reaching the informal labor market. This root cause relates to dropping out of the formal education system. We have agreed a two-year program in The Philippines with an NGO partner that aims to strengthen alternative learning systems and ensure that young people complete an educational qualification.

### Activities in 2022

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

#### **Tracking and follow-up**

We continue to report against our long-term targets, provide examples of corrective actions and KPIs in our annual People & Planet sustainability report and follow up on issues mentioned above to check continued adherence. Suppliers failing to address audit findings within six months negatively affects their performance evaluation, as their audit score is lowered. Supply chain workers are engaged through worker interviews during CR audits to ensure the workers' voice is included, and Nokia Ethical Helpline channels are open for all individuals and stakeholders to flag concerns, including our suppliers' employees. We disclose examples of our findings on page 71 of our 2022 People & Planet sustainability report **here**. The number of grievances from suppliers were reported in the integrity section of the report with commentary on page 60 here. Read more on raising concerns on pages 59 under the Ethics and Compliance section here.



#### 5.2 Collaboration and looking forward

In 2022, we continued our collaboration with a number of key organizations that focus on CR in global supply chains. As a member of the RBA, we participated in workstreams covering labor rights and environmental issues.

We also continued our cooperation with the JAC. This is an association of telecom operators (our customers) that aims to verify, assess and develop CR implementation across the manufacturing centers of multinational suppliers of the information communication technology (ICT) industry. The membership of JAC increased in 2022 and now includes 26 of the world's telecom operators. JAC members share resources and best practices to develop long-term sustainability and CR implementation in the different layers or tiers of the global ICT supply chain. In 2022 we conducted 100 supplier responsibility audits, 52 of which were conducted through either the RBA Validated Assessment Program 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, involving 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 completed our second independent assessment in early 2022 with Foley Hoag LLP as the assessor, and we are proud to report that in May 2022 the GNI board found we have made good faith efforts to implement the GNI Principles on freedom of expression and privacy with improvement over time. The GNI report is expected to be published shortly, closely coinciding with the issuance of Nokia's Modern Slavery statement.

We aim to keep our robust systems, processes and procedures at the current high standard, while seeking to continually improve in 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 continue to encourage our main suppliers to recognize and act on the challenge of modern slavery.

This statement covers the financial year of 2022.

Pekka Lundmark, President and CEO Nokia Group





This statement applies to Nokia Corporation and its subsidiaries.

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

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. This Australian entity is a fully integrated entity within the Nokia global group and aligns to all policies and practices of Nokia globally.

During the preparation stage of this Statement, a representative of the Board of Directors of Nokia Solutions and Networks Australia Pty Ltd 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 the Global Statement and aligned with its contents.

The Board of Directors of Nokia Solutions and Networks Oy, for itself and the Nokia affiliates listed in this note approved this Statement on 19th June 2023. The resolution was signed by Tommi Uitto, Chairman, Nokia Solutions and Networks Oy, Peter Rönnberg and Risto Nurmi. The Board of Directors delegated authority to Pekka Lundmark to sign this statement on their behalf.

Nokia is a registered trademark of Nokia Corporation. Other product and company names mentioned herein may be trademarks or trade names of their respective owners.

This Modern Slavery Statement 2022 has been approved by the principal governing body (being the Board of Directors) for the reporting entity (being Nokia Solutions and Networks Australia Pty Ltd) via circular resolution of the directors dated 27 June 2023.

Andrew Cope
Director, Nokia Solutions and Networks Australia Pty Ltd

Nokia OYJ Karakaari 7 02610 Espoo Finland

Tel. +358 (0) 10 44 88 000

nokia.com



#### **About Nokia**

At Nokia, we create technology that helps the world act together.

As a B2B technology innovation leader, we are pioneering networks that sense, think and act by leveraging our work across mobile, fixed and cloud networks. In addition, we create value with intellectual property and long-term research, led by the award-winning Nokia Bell Labs.

Service providers, enterprises and 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.

Nokia is a registered trademark of Nokia Corporation. Other product and company names mentioned herein may be trademarks or trade names of their respective owners.

© 2023 Nokia

# Nokia Modern Slavery Statement For Year 2022 (with NSNAPL Statement)

Final Audit Report 2023-06-29

Created: 2023-06-29

By: Carin Holmes (carin.holmes@nokia.com)

Status: Signed

Transaction ID: CBJCHBCAABAAtDfcisPCT3Y0R2\_X-tnWfkCh8jlTD6Rd

Number of Documents: 1

Document page count: 17

Number of supporting files: 0

Supporting files page count: 0

# "Nokia Modern Slavery Statement For Year 2022 (with NSNAPL Statement)" History

- Document created by Carin Holmes (carin.holmes@nokia.com) 2023-06-29 9:17:27 PM GMT- IP address: 222.153.95.42
- Document emailed to andrew.cope@nokia.com for signature 2023-06-29 9:19:42 PM GMT
- Email viewed by andrew.cope@nokia.com 2023-06-29 10:04:33 PM GMT- IP address: 163.53.144.77
- Agreement viewed by andrew.cope@nokia.com 2023-06-29 10:04:36 PM GMT- IP address: 163.53.144.77
- Signer andrew.cope@nokia.com entered name at signing as Andrew Cope 2023-06-29 10:05:41 PM GMT- IP address: 163.53.144.77
- Document e-signed by Andrew Cope (andrew.cope@nokia.com)

  Signature Date: 2023-06-29 10:05:43 PM GMT Time Source: server- IP address: 163.53.144.77
- Agreement completed.
   2023-06-29 10:05:43 PM GMT

