

NOKIA'S HUMAN RIGHTS APPROACH

NOKIA
Connecting People



Introduction

Nokia believes that our core business – connecting people with mobile technology – contributes to the promotion of human rights by enabling and enhancing communication and facilitating economic development. Improved communications provide better opportunities for freedom of expression, and therefore promote civil and political rights as well as economic and social rights. At the same time, we have specific human rights responsibilities, towards our employees, customers, the communities where we work, and within our supply chain.

Nokia has conducted, and is constantly conducting, due diligence to fulfil its responsibility to respect human rights and assess any potential human rights issues that may be associated with its activities, operations and relationships. One part of due diligence process has been a benchmarking study in 2010 of the human rights situation in 18 countries. The Human Rights approach is based on the benchmarking study, as well as our own assessment of international best practices.

Human Rights matters to be considered vary at different stages of the Nokia value chain. In the research and development phase when designing features for a new product, aspects like accessibility and privacy have to be taken into account. In manufacturing, including our supply chain, the main human rights matters are related to labour conditions and health & safety.

There are several human rights issues related also to the actual use of the product, starting from the ability of mobile technology to gradually make communications and access to information available and affordable for everyone. Mobile devices have an important role to act as an equaliser by democratising access to information and media.

Many corporate responsibility demands that Nokia faces are highly complex. This approach document aims to lay down principles that Nokia will strive to implement and focus on in addressing such demands relating to human rights. However, this Human Rights approach is not intended, and should not be understood, to create additional duties, responsibilities or liabilities to Nokia, but this document merely identifies the key areas that Nokia considers important from the viewpoint of human rights, and expresses Nokia's aspirations with respect to implementation of human rights in its operations.

Principles of Nokia's Human Rights Approach

This approach applies to all Nokia operations worldwide excluding Nokia Siemens Networks (NSN) as NSN has published its own Human Rights Approach.

Nokia Human Rights Approach is a third layer on top of the foundation consisting of, as a first layer, the Nokia values and, as a second layer, Nokia's Code of Conduct. The *Code of Conduct* affirms our commitment to the highest standards of ethical conduct, including respect for human dignity and recognition of fundamental human rights. This document builds on the *Code of Conduct* to explain our human rights approach in greater detail.

The approach complements and should be read in conjunction with related documents, among others:

- [Nokia Code of Conduct](#)
- [Nokia Labour Conditions standard](#)
- [Nokia Privacy Policy](#)
- [Privacy policy for Nokia's recruitment related activities](#)
- [OECD Risk Awareness Tool for Multinational Enterprises in Weak Government Zones](#)
- [Nokia Siemens Networks Human Rights approach](#)
- [Nokia Supplier Requirements](#)

This approach document will be updated as business situations, or our business environment, evolve or new human rights issues emerge.

Nokia targets to extend, on a global scale, its influence with regard to human rights to various stakeholders, such as our employees, suppliers, customers, investors, the local communities, governments and NGOs. While Nokia is committed to supporting and respecting human rights, and we believe it is our responsibility to drive best practices throughout our value chain, our commitment is limited to what is within our reasonable capability.

Our commitments

Our policies and processes are based on the following core elements:

1. The principles of The Universal Declaration of Human Rights are embedded in our Code of Conduct and in our values.
2. Our belief that mobile technology promotes human rights through enabling free expression, access to information, exchange of ideas and economic development.
3. Our belief that all people everywhere in the world have the right to be treated with dignity and respect.

Nokia endorses the principles and values of [the Universal Declaration of Human Rights \(UDHR\)](#). In Nokia operations, we consider the following UDHR principles especially relevant: The right to equal opportunity and non-discriminatory treatment (as in UDHR Articles 1,2 and 7), The right to freedom of expression (articles 18, 19 and 20), The rights of workers (articles 23 and 24) and The right to security of persons (article 3).

We commit to [the ILO Core Conventions on Labour Standards](#), [the OECD Guidelines for Multinational Enterprises](#) and [the Principles of the United Nations Global Compact](#). This approach also draws on and supports the work of Professor John Ruggie, the UN Secretary General's special representative on business and human rights.

Nokia reports on its collective human rights performance as a part of our annual reporting process, in line with the UN Global Compact *Communication on Progress* and [the Global Reporting Initiative's](#) Human Rights Key Performance Indicators.

Our responsibilities to stakeholders

Employees

At Nokia, with respect to the labour relations and human resources, we focus on the following human rights:

- Freedom from discrimination based on race, creed, colour, nationality, ethnic origin, age, religion, gender, sexual orientation, marital status, connections with national minority, disability, or other status
- Non-tolerance for child labour
- Non-tolerance for forced labour
- The right to healthy and safe working conditions
- The right to rest and leisure, preventing workers from excessive overtime work
- The right to freedom of assembly, association and collective bargaining, the right to form and join trade unions
- The right to just and favourable working conditions, the right to fair wages, the right to equal pay for equal work
- Workers right to information related to their employment
- Access to grievance channels and right to remedies

Nokia applies the local legislation relating to labour relations and human resources, in addition to which it has certain global and local policies and guidelines such as the Global Employment Guidelines. We incorporate human rights issues into the Code of Conduct training that we give to all employees.

Communities

Nokia respects the human rights of the communities in areas where we operate. In particular:

- Nokia's practice is to take a precautionary approach to environmental issues. We will seek to avoid or mitigate adverse environmental impacts of our operations.
- We respect indigenous rights and civil society in these areas.

Before undertaking any significant investment in a new area, for example a new factory, we will conduct social, environmental and human rights due diligence. In some cases, it may take time for the full impacts of a major project to become apparent. In addition to the initial assessment, our common practise is to conduct regular follow-ups to monitor both adverse and positive developments as they emerge. We will aim at a dialogue with communities, civil society and other external stakeholders, and will seek to resolve any concerns about actual or potential human rights impacts.

Customers

At Nokia we respect the privacy of our customers. All customer data gathered is intended to remain strictly confidential, subject to certain qualifications specified in the Nokia Privacy Policy. Nokia's product offering is targeting to enhance freedom of expression.

Nokia takes a precautionary approach to health issues. All our products are tested to avoid any risk to the health of our customers.

Nokia will abide by its business integrity principles in all its dealings with customers. Nokia has zero tolerance for paying and accepting bribes either directly or indirectly.

Engagement with suppliers and contractors

We expect our suppliers and contractors to comply with human rights and environmental standards that are compatible with our own and to conduct their business in accordance with the highest ethical standards throughout the entire supply chain. We specify these standards in our supplier requirements. We require our partners to honour these as minimum requirements and covering their own operations. On top of that, we expect that our suppliers have the same requirements to their suppliers. These requirements include an obligation to abide by all applicable laws and regulations (including but not limited to international labour conventions and national employment laws).

Nokia's supplier requirements specify that we have the right to verify our suppliers' compliance with our requirements. Where we identify potential concerns relating to human rights or any other area, we will work with our partners to seek appropriate remedies.

Equally, we retain the right to withdraw from commercial relationships if our suppliers fail to live up to their commitments.

Our aim is to ensure materials that end up in our products come from socially and environmentally sustainable sources. For example, mining activities that benefit militant groups, contribute to conflict or perpetuate human rights abuses are unacceptable. We have banned the use of conflict metals and require our suppliers to use legal and ethically managed sources for their raw materials. Nokia does not tolerate any activities that support or fuel conflict.

Engagement with states

In accordance with the core international human rights conventions and Professor Ruggie's *Protect, Respect and Remedy* report, we recognise that states have the prime duty to protect their citizens from human rights abuses. We believe that companies have a responsibility to respect human rights, including in areas where governance standards are poor, and where human rights are not universally respected.

Nokia continually monitors global trade and export controls and takes all reasonable measures to comply with all trade control regulations as well as sanctions determined by the U.N. When operating in countries and regions with poor governance standards, our policy is to exercise heightened standards in order not to be exposed to involvement in corruption or other abuses. Nokia has a non-tolerance approach regarding bribes of any kind.

Seeking guidance and reporting problems

Feedback and grievance processes are under renewal at Nokia and this approach document will be updated accordingly during 2011.

Currently a complaint or concern relating to human rights at Nokia can be reported to the Board of Directors, its non-executive members, or its subcommittees by using our grievance channel:

Through website

by delivering your message via the following link:

<http://www.nokia.com/about-nokia/corporate-governance/contact-us/contact-the-board>

By mail to the following address:

Nokia Board of Directors / Complaint
Nokia Corporation
P O Box 226
00045 Nokia Group
Finland

Nokia employees seeking guidance on the implementation of this approach – or reporting suspected abuses – should in the first instance contact their line managers. If these cannot be resolved at a local management level, they are referred to Nokia's Ethics office. Nokia will ensure that there will be no adverse work-related consequences to an employee as a result of the employee making a good-faith complaint regarding accounting or auditing matters at Nokia, based on his/her personal knowledge.

Where reports of abuse are confirmed, Nokia will seek prompt action. Nokia employees who are found to have infringed our human rights standards may face disciplinary action up to and including termination of work and may be reported to the authorities.

As with other aspects of Nokia's *Code of Conduct*, employees will not be penalised if they report suspected abuses that – on closer inspection – are not confirmed, provided that the original report is made in good faith.

Suppliers and other external parties are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this approach, or if they wish to report suspected abuse. They, and other external stakeholders, may also report problems or concerns to Nokia's official grievance channel, ultimately directly to the Nokia Board of Directors.