

Company Name Nokia
Industry ICT (Supply Chain only)
Overall Score (*) 24.4 out of 100

Theme Score	Out of	For Theme
1.3	10	A. Governance and Policies
6.1	25	B. Embedding Respect and Human Rights Due Diligence
4.6	15	C. Remedies and Grievance Mechanisms
3.3	20	D. Performance: Company Human Rights Practices
4.9	20	E. Performance: Responses to Serious Allegations
4.2	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: UNGC principles 1 & 2: The Company is committed to the 'UN Global Compact and its principles.' [Human Rights Policy, 10/2016: nokia.com] Met: UDHR: The Company is 'committed to the principles and values of The Universal Declaration of Human Rights'. [Human Rights Policy, 10/2016: nokia.com] Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD: No explicit commitment to the OECD Guidelines for MNEs could be found. [Human rights, 6/9/2019: nokia.com]
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: ILO Core: The Company adheres 'to the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [Modern Slavery Statement, 6/2018: nokia.com] Met: UNGC principles 3-6: The Company has made a commitment to the UN Global Compact. [Human Rights Policy, 10/2016: nokia.com] Met: Explicitly list ALL four ILO for ICT suppliers: 'Supplier shall ensure that its employment policies are free from discrimination based on race, color, gender, religion, national extraction, social origin, sexual orientation, political opinion, age, disability, marital or family status, personal relationships and health status.' 'The Supplier shall not engage in or benefit from any use of forced or compulsory labor including prison labor.' 'Supplier shall respect, and not obstruct or discourage in any way, the right of all employees to seek to form or join their own organizations

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and to bargain collectively'. 'Nokia does not tolerate in any context the use of servitude, child labor, forced labor, human trafficking, or slavery in our operations in any region we operate, or in any part of our global supply chain'. [An overview of our supplier requirements on corporate responsibility, 1/22/2018: nokia.com & Nokia Code of Conduct, 2018: nokia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company has 'a strict policy against using child labor and zero tolerance to all forms of forced, bonded, or imprisoned labor', and all 'employees have the right to collective bargaining and freedom of association.' Company policies also cover non-discrimination. [Modern Slavery Statement 2019, 2019: google.com] • Met: Respect H&S of workers: The Company will 'Provide healthy and safe working conditions for all [its] employees and promote well-being and fair treatment at work'. [Health, Safety and Labour Conditions Policy, 2015: nokia.com] • Met: H&S applies to ICT suppliers: The Company ensures 'suppliers, contractors and other business partners follow the same standards and place equally high priority on health, safety and labor conditions in their operations'. [Health, Safety and Labour Conditions Policy, 2015: nokia.com] • Not met: working hours for workers • Met: Working hours for ICT suppliers: The Company requires the following: 'Supplier shall ensure that employees can perform assigned tasks efficiently without exceeding the maximum working hours. [...] The normal work week, not including overtime, shall not exceed 48 hours or the maximum hours allowed as per local law whichever is lower. Overtime work shall be voluntary and shall not exceed 12 hours per week or the maximum hours allowed per local law whichever is lower. Supplier shall ensure that employees have at least one day off per seven-day week, and that overtime work is voluntary and it shall not be requested on the regular basis and that employees are entitled to 2 weeks of paid annual leave per year. Public holiday entitlements and other leaves of absence (e.g., medical or parental) shall comply with local labor laws or applicable collective agreements.' [An overview of our supplier requirements on corporate responsibility, 1/22/2018: nokia.com]
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing in conflict areas: The Company commits and requires 'socially and environmentally responsible sourcing of Conflict Minerals for' its products. However, no explicit reference to conflict affected and high-risk areas could be found. [Conflict Minerals Policy, 2016: nokia.com] • Met: Based on OECD Guidance: The Company bases its due diligence process on the OECD Due Diligence Guidance for Responsible Supply Chains. [Conflict Minerals Report for 2018, 30/5/2019: nokia.com] • Not met: Requires responsible mineral sourcing from suppliers: The Company requires its 'suppliers to show their commitment to only sourcing these materials, that either directly or indirectly contribute to conflict, from environmentally and socially responsible sources.' However, this commitment does not seem to require to be based on OECD Guidance, and cover high risk areas. [Modern Slavery Statement 2019, 2019: google.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals: The Company defines conflict minerals as 'Columbite-tantalite (coltan) (or its derivative tantalum), cassiterite (or its derivative tin), gold and wolframite (or its derivative tungsten)'. No evidence found of commitment including all minerals. [Conflict Minerals Policy, 2016: nokia.com] • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights: No expectation for suppliers to respect the rights of women, children or migrants could be found. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to stakeholder engagement Not met: Regular stakeholder engagement Score 2 <ul style="list-style-type: none"> Not met: Commits to engage stakeholders in design Not met: Regular stakeholder design engagement: The Company bases its on-site corporate responsibility audits for suppliers partly on stakeholder concern. However, no clear evidence of regular engagement of affected stakeholders in the monitoring of its human rights approach could be found. [People and Planet Report 2018, 5/2019: nokia.com]
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to remedy: No commitment to remedy adverse impacts that the Company has caused could be found. Score 2 <ul style="list-style-type: none"> Not met: Not obstructing access to other remedies Not met: Collaborating with other remedy initiatives Not met: Work with ICT suppliers to remedy impacts: While the Company offers examples of non-compliance in the supply chain and actions taken by supplier, no commitment to remedy adverse impacts through collaboration with suppliers could be found. Collaboration with suppliers either through the suppliers own mechanisms or through the development of third party non-judicial remedies. [People and Planet Report 2018, 5/2019: nokia.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company has a 'strict non-retaliation policy that protects anyone who, in good faith, reports what he or she believes to be a violation of law, Code of Conduct or company policy. To the contrary, abuse of the reporting of complaints may expose employees to sanctions.' However, no commitment found not to tolerate threats to human rights defenders could be found. [Ethics Point Nokia, 8/5/2019: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Expects ICT suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: CEO or Board approves policy: No evidence found in relation to this indicator in publicly available sources. Not met: Board level responsibility for HRs: The Company states the following: 'The Board's responsibilities are active, not passive, and include the responsibility to evaluate the strategic direction of Nokia, its management policies and the effectiveness of the implementation of such by the management on a regular basis.' However, it is unclear whether the Human Rights Policy is included in this. No further details found in publicly available sources. [Corporate Governance Statement: nokia.com] Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion: The Company discloses that the Board 'reviews the Company's sustainability activities.' 'In 2018, the Board of Directors reviewed our corporate sustainability status including targets, performance, achievements, and challenges as well as the results of our value creation analysis.' However, no comment found about specific human rights-related topic discussed. [Corporate Governance Guidelines, 2019: nokia.com & People and Planet Report 2018, 5/2019: nokia.com] Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key ICT HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Senior responsibility for HR: No public information found relating to responsibility for human rights. Score 2 <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for ICT in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key ICT HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: The Company indicates that 'other potential risks to our business and reputation are also evident. Corruption, unethical behavior, and lack of respect for human rights and fair labor conditions in operations and supply chains remain growing concerns in many countries, resulting in the need for greater transparency and integrity from companies, going beyond the increasing regulatory sphere'. However, it is not clear whether these are integrated as part of the 'enterprise risk management' systems, as this comment is not made in the context of risk factors or risk framework. [Annual Report 2018 20F, 2018: nokia.com & People and Planet Report 2018, 5/2019: nokia.com] Score 2 <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: The Company discloses the following: 'Nokia requires all employees to familiarize themselves with and follow the Nokia code of conduct in their work. Our program to make it a part of daily business includes training, materials, team discussions, and a mobile app.' The Code of Conduct is available in several different languages. [Code of Conduct, 7/5/2019: nokia.com] Score 2 <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder: No evidence of how the Company communicates policy commitments to affected or potentially affected stakeholders could be found. • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Requiring ICT suppliers to communicate policy down the chain: The Company uses its best efforts to make 'third parties commit by contract to Nokia's Code of Conduct or will ensure that such parties have similar policies in effect.' It also requires its suppliers to do the same for sub-suppliers. 'As a part of Supplier Requirements to the sub-suppliers, a supplier shall also set environmental and labor condition requirements (e.g., occupational health and safety, ethical conduct) for its sub-suppliers, including waste handling/recycling sub-suppliers.' This includes suppliers, representatives and other contractors. As indicated above, 'as part of suppliers requirements to the sub-suppliers, a supplier shall also set environmental and labour condition requirements'. [Nokia Code of Conduct, 2018: nokia.com] Score 2 <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As stated above, business relationships and suppliers can be required to commit by contract. [Nokia Code of Conduct, 2018: nokia.com] • Not met: Including on ICT suppliers: No evidence found of contractual or binding arrangements being cascaded down the supply chain.

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B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: The Company states the following: 'Key principles and practices of our ethical business approach are set down for our employees in our Code of Conduct. We support, maintain, and constantly improve our employees' knowledge, training, and continuous communication with them.' It is unclear whether this training includes all employees. [Modern Slavery Statement 2019, 2019: google.com] • Met: Trains relevant ICT managers including procurement: Procurement teams are the first trained. The Company describes the following: '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 competence development of our suppliers on these issues as well. We start by building the needed capacity by training our own procurement teams first. They need to be equipped with the ability to communicate our requirements to suppliers and identify potential sustainability risks.' [Modern Slavery Statement 2019, 2019: google.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Met: Monitoring ICT suppliers: The Company performs audits on labor conditions and environmental management. 'We conduct specific corporate responsibility in-depth audits on our existing suppliers and align with SA8000 methodology in audit implementation. The audits include not only document reviews, interviews with managers and employees, and site visits, but also inspections of facilities, production lines, and warehouses. In addition, we continue to use EcoVadis sustainability assessments to review the environmental, labor, health, safety, ethics, and sustainable procurement management systems of our suppliers through a tailored questionnaire and supporting document reviews.' It also has a general requirements audit. 'Our general audit covers the full set of supplier requirements, and of which corporate responsibility requirements are a subset. We commonly use this type of audit with new high-risk suppliers or when a supplier has seen a significant change in its business situation such as country location change'. [People and Planet Report 2018, 5/2019: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: When the Company finds an instance of non-compliance, recommendations are made, and these are addressed through corrective action plans. No further details found in relation to description of corrective action process. Throughout audits in developing countries, the Company found '764 instances of non-compliance of which 378 related to health and safety, 76 related to environment.' The total number of instances of non-compliance was 764. Of these, 3 had to do with child labour, 4 with forced labour, 378 with health and safety, 2 with freedom of association, 6 with discrimination, 10 with disciplinary practices, 51 with working hours, and 54 with remuneration [People and Planet Report 2018, 5/2019: nokia.com] • Met: Example of corrective action: The Company provides several examples in its People and Planet report. One of which is in the category of forced labor. The non-compliance identified was the following: 'The proportional payment of the cost of the course / seminar / training is made in case of labor resignation within the following six months from the training.' The actions taken by the supplier: 'This finding on forced labor is in the process of closing with Nokia's recommendation that paying back of the training course by the employees shall be stopped/not practiced in cases where the training is a necessity for executing the job a person is assigned to.' [People and Planet Report 2018, 5/2019: nokia.com] • Not met: Discloses % of ICT supply chain monitored: In 2018, the company performed 364 supply chain audits, including 75 on-site audits on corporate responsibility topics. 38 were full audits, and 251 were done using the EcoVadis scorecard. However, it is unclear what proportion of the supply chain was covered. [People and Planet Report 2018, 5/2019: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects ICT selection of suppliers: The Company discloses the following: 'Before any work begins with a supplier, we expect them to meet the high ethical, social, and environmental standards set out in our Supplier Requirements,' which includes human rights standards. [People and Planet report, 2017: nokia.com] • Not met: HR affects on-going ICT supplier relationships: 'In 2018 we also engaged with our procurement category streams by setting minimum expectations for performance level of Preferred and Allowed status suppliers documented in procurement category strategies. The performance of suppliers across our sustainability monitoring programs such as onsite audits, CDP, EcoVadis, Supplier Health and Safety Maturity Assessment as well as Conflict Minerals program contribute to our sustainability pillar which is one of the six pillars of our Supplier Performance Evaluation.' However, this only seems to apply to conflict mineral suppliers, and not all suppliers. [People and Planet Report 2018, 5/2019: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Met: Working with ICT suppliers to improve performance: The Company indicates that it ran '11 training workshops for suppliers operating in high-risk countries such as Cameroon, China, Colombia, India, Malaysia, Mali, Myanmar, Mexico, Peru, Senegal and Togo. The Company reports training including, at least, health and safety, and conflict minerals ('we again held two workshops on conflict minerals and cobalt sourcing in China, perhaps our most challenging market in this area'). [People and Planet Report 2018, 5/2019: nokia.com]
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Met: Workers in ICT SC engaged: Supplier worker engagement is included in the Company's in-depth audits of labor conditions and environmental management. However, no description of how they were identified could be found. Audits (trigger) are an ongoing process for the Company. [People and Planet Report 2018, 5/2019: nokia.com] • Not met: Communities in the ICT SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: Identifying risks in ICT suppliers: The Company discloses the geographic region where it has found modern slavery risk, but it does not explain the process of identification. Additionally, the Company performs audits on its suppliers, but no evidence could be found relating to a system to identify which are the human rights risks in the supply chain. [Modern Slavery Statement 2019, 2019: google.com & India CSR report, 2016-17: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company discloses the following: 'In 2018 we began the preparation process for our commitment to the Global Network Initiative (GNI) to undergo an external Human Rights assessment by GNI assessors. GNI participants commit to implement the organization's Principles on Freedom of Expression and Privacy ("the GNI Principles"), which provide direction and guidance to the ICT industry and its stakeholders in protecting and advancing the enjoyment of these human rights globally.' However, these sorts of risks are not related to human rights labor risks. [Human rights, 6/9/2019: nokia.com] • Met: Public disclosure of salient risks: The Company discloses the areas of procurement that it has found to be high or low risk in relation to modern slavery. This also includes a world map where significant areas of operation are highlighted

Indicator Code	Indicator name	Score (out of 2)	Explanation
			with the corresponding level of risk that was assessed. [Modern Slavery Statement 2019, 2019: google.com] Score 2 • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks: The Company provides information about the actions taken after supplier audits, however, no information found about how the Company has taken steps to prevent risks identified through the due diligence process. This indicator looks for a system and examples of actions taken to prevent or mitigate salient human rights risks, rather than correcting non-compliances found. [People and Planet Report 2018, 5/2019: nokia.com] • Not met: Including in ICT supply chain • Not met: Example of Actions decided Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including ICT suppliers Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company describes the following: 'Nokia provides multiple ways to raise a concern. You may talk to your line manager, Legal & Compliance, HR or Local Ombud Leaders. The Ombud Leaders serve as a neutral and confidential channel for discussing ethics questions and concerns. You may also write to our CEO or our Board. All concerns are handled confidentially.' [Nokia Code of Conduct, 2018: nokia.com] Score 2 • Met: Number grievances filed, addressed or resolved: The Company discloses that in 2018, 887 ethical concerns were reported through the ethics helpline. Of these, 2 were about human rights. [People and Planet Report 2018, 5/2019: nokia.com] • Met: Channel is available in all appropriate languages: The online channel is available in several different languages. [Ethics Point Nokia, 8/5/2019: secure.ethicspoint.com] • Met: Opens own system to ICT supplier workers: The same system is open to all external stakeholders. 'All stakeholders play a vital part in helping to keep Nokia safe every day. One of the most critical contributions is to report knowledge or suspicion of any unethical behaviour, violation of law or Nokia policies'. [Code of Conduct, 7/5/2019: nokia.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Company offers the same channels described in C.1 to external stakeholders. It offers 'multiple channels to both our internal and external stakeholders to report potential ethical concerns or violations to the above policies by providing an email address, an online tool and, also by providing dedicated country-specific phone numbers.' [Modern Slavery Statement 2019, 2019: google.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The website, also accessible to external stakeholders, is available in multiple languages. [Ethics Point Nokia, 8/5/2019: secure.ethicspoint.com] • Met: ICT supplier communities use global system: As stated above, this mechanism is available to all external stakeholders. [Modern Slavery Statement 2019, 2019: google.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system: No information could be found relating to this indicator. • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: ICT suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales: No information found related to response timescales • Not met: How complainants will be informed • Not met: Who is handling the complaint <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company describes the following process: 'The Compliance team will review and promptly address your concern for appropriate follow-up and resolution. [...] The Compliance team will also assign a high-level "familiar manager" from the business to oversee the investigation.' However, no details found on whether complaints might be escalated to more senior levels within the company or to independent third parties to reach a resolution. [Nokia Code of Conduct, 2018: nokia.com]
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company 'will not tolerate any adverse employment action against an employee who raises a compliance concern.' This also applies to external stakeholders. [Nokia Code of Conduct, 2018: nokia.com & Modern Slavery Statement 2019, 2019: google.com] • Met: Practical measures to prevent retaliation: The helpline allows for anonymous reporting. [People and Planet Report 2018, 5/2019: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects ICT suppliers to prohibit retaliation: The Company makes its own system available to suppliers' workers and stakeholders (see C.1 and C.2) and therefore retaliation against them is also prohibited.
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Living wage in supplier code or contracts: The Company states suppliers 'shall respect the right of personnel to a living wage and ensure that wages for a normal work week, not including overtime, shall always meet at least legal or industry minimum standards, or collective bargaining agreements.' However, no evidence found on whether wage is sufficient to cover basic needs of employee his/her family or dependants, and provide some discretionary income. [An overview of our supplier requirements oncorporate responsibility, 1/22/2018: nokia.com] Not met: Improving living wage practices of suppliers: The Company has provided some evidence to this indicator, however, no details found in public available sources. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Avoids business model pressure on HRs: In its People and Planet Report the Company gives various human Rights Due Diligence anonymized case examples. However, these examples show 'both GO and NO GO sales cases'. They are not related to suppliers. No evidence found where the Company describes the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. The Company also refers to an example of Health & Safety Consequence Management. However, no evidence for the above found. [People and Planet Report 2018, 5/2019: nokia.com] Not met: Positive incentives to respect human rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.4.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Identifies suppliers back to product source: The Company states that suppliers that use conflict minerals are required to trace sub-suppliers to the smelter level. In its People and Planet Report the Company discloses a supply chain map showing all the countries where it has suppliers as well as a short overview of suppliers, auditing and assessment. However, no evidence could be found that the Company has identified all direct and indirect suppliers (including components). [An overview of our supplier requirements oncorporate responsibility, 1/22/2018: nokia.com & People and Planet Report 2018, 5/2019: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Discloses significant parts of supply chain and why: No evidence found of a public disclosure of the names and addresses of suppliers for the most significant parts of the supply chain (to be defined by the Company).
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Child Labour rules in codes or contracts: The Company states the following: 'Supplier shall check the eligibility of candidates and that they are not children. Supplier may employ young workers, but where such young workers are subject to compulsory education laws, they shall only work outside of school hours.' The Company defines children as anyone under the age of 15 and young workers as employees between 15 and 18. The Company puts in place a child Labor Remediation for direct and indirect forms of child labor. No evidence found, however, on requirements for age verification. The Company also made a comment in the feedback provided to CHRB, however, this statement was not found to be supported by publicly available sources. [An overview of our supplier requirements oncorporate responsibility, 1/22/2018: nokia.com & People and Planet Report 2018, 5/2019: nokia.com] Not met: How working with suppliers on child labour: The Company also describes the following: 'We have a strict policy against the use of child labor and we continuously work closely with our suppliers to scrutinize, monitor, and remediate any and all potential risks. We have strict ethical and human resources policies which have designed to ensure that no one below the legal working age is hired in our business.' However, no details found on proactive work carried out with suppliers to prevent child labour. [People and Planet Report 2018, 5/2019: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts: The Company states individuals who work for suppliers shall 'not be required to give financial deposits (neither directly nor through subcontractors used for employment)'. However, no reference to repaying, acknowledging recruitment costs could be found. [An overview of our supplier requirements oncorporate responsibility, 1/22/2018: nokia.com] • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Company states suppliers' employees shall not be required to 'deposit original identity documents such as passports as condition of employment.' [An overview of our supplier requirements oncorporate responsibility, 1/22/2018: nokia.com] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: The Company requires suppliers to 'respect, and not obstruct or discourage in any way, the right of all employees to seek to form or join their own organizations and to bargain collectively [...] without any negative consequences or retaliation from the organization.' It also states in its People and Planet Report 'All employees have the right to form or join their own organizations and conduct collective bargaining. We expect our suppliers to uphold that right, without obstruction or discouragement. Where there may be legal restrictions in place, we find alternative means to enable both individuals and groups to raise concerns to management.' [An overview of our supplier requirements oncorporate responsibility, 1/22/2018: nokia.com & People and Planet report, 2017: nokia.com] • Not met: How working with suppliers on FoA and CB: No additional evidence found in sources provided by the Company to CHRB. Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company requires the following: 'Supplier shall ensure that physical and mental working conditions allow employees to perform their tasks safely and efficiently. Supplier shall have procedures for risk assessment on occupational health & safety, including identification, evaluation as well as mitigation and prevention of hazards. Preventative action shall include, for example, safety instructions, work procedures, preventive maintenance, employee training, appropriate safety devices, personal protective equipment and clothing, hearing protectors, chemical control or machine safeguarding. Management shall ensure that all workers shall respect and apply safe practices and procedures at all times. The organization shall appoint a senior management representative to be responsible for ensuring a safe and healthy workplace environment for all personnel. Supplier shall nominate and train persons responsible for the occupational health of employees.' [An overview of our supplier requirements oncorporate responsibility, 1/22/2018: nokia.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures: 'Lost-time incidents of our employees decreased by 5 percent between 2017–2018, while there were 39 incidents in 2018. It is a positive sign of our safety culture that at the same time, reporting of near miss incidents by both employees and contractors increased by 9 percent, with 454 incidents reported in 2018'. However, this indicator looks for evidence of quantitative data at suppliers' locations. [People and Planet Report 2018, 5/2019: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Fatalities disclosures: 'In 2018, there was one (four in 2017) fatal incident resulting in the death of one (five in 2017) contractor/subcontractor personnel while carrying out work on our behalf. The fatality was related to working at height. Any such serious incidents while carrying out work for Nokia are unacceptable'. However, this indicator looks for quantitative data regarding suppliers' locations. [People and Planet Report 2018, 5/2019: nokia.com] • Not met: Occupational disease rates Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.4.9.b	Working hours (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Working hours in codes or contracts: The Company requires the following: 'Supplier shall ensure that employees can perform assigned tasks efficiently without exceeding the maximum working hours. The supplier shall comply with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours, breaks and public holidays. The normal work week, not including overtime, shall not exceed 48 hours or the maximum hours allowed as per local law whichever is lower. Overtime work shall be voluntary and shall not exceed 12 hours per week or the maximum hours allowed per local law whichever is lower. Supplier shall ensure that employees have at least one day off per seven-day week, and that overtime work is voluntary and it shall not be requested on the regular basis and that employees are entitled to 2 weeks of paid annual leave per year. Public holiday entitlements and other leaves of absence (e.g., medical or parental) shall comply with local labor laws or applicable collective agreements.' [An overview of our supplier requirements on corporate responsibility, 1/22/2018: nokia.com] • Not met: How working with suppliers on working hours: While the Company gives statistics about non-compliance in relation to working hours and also gives examples of actions taken, there is no general description of how the Company works with suppliers to improve their practices in relation to working hours. [People and Planet Report 2018, 5/2019: nokia.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Responsible mineral sourcing due diligence in supplier contracts: The Company indicates that it has 'incorporated the principles outlined in the Policy into Nokia Supplier Requirements which are part of Quality appendix to standards supplier agreements'. However, it is not clear whether these include the requirement of responsible sourcing (not benefitting armed groups and respecting human rights) from conflict affected and high risk areas, and requirements being based on the OECD Guidelines. [Conflict Minerals Report for 2018, 30/5/2019: nokia.com] • Not met: Builds capacity with smelters/refiners: The Company describes the following for their direct suppliers: 'A number of webinars were conducted to suppliers with high or medium risk. In addition, two workshops were conducted in China. Direct feedback was provided to all of the suppliers in most of the cases in several rounds. Suppliers were also encouraged to participate in industry forums and collaboration.' However, no publicly available information about building capacity with smelters could be found. [Conflict Minerals Report for 2018, 30/5/2019: nokia.com] Score 2 <ul style="list-style-type: none"> • Not met: Disclosure of smelter information in supplier requirements • Not met: Responsible conflict mineral sourcing covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Risk identification and disclosure in line with OECD Guidance: The Conflict minerals report describes the following: 'With direct suppliers, the primary means for conducting the reasonable country of origin inquiry survey through a supply chain using the standard industry conflict minerals reporting template (provided by RMI), with the aim of assessing the direct suppliers' due diligence activities and identifying processing facilities and countries of mineral origin. Nokia assesses risks by reviewing supplier templates to understand their due diligence activities and identified processing facilities and countries of origin, and whether the minerals originated from recycled or scrap sources. In order to improve data quality and completeness Nokia conducts several rounds of surveys with suppliers, provides feedback on supplier templates and agrees on corrective actions if necessary. [...] Nokia continues the risk assessment by comparing smelter data provided by suppliers to information provided by the RMAP and online research in order to verify whether the smelters and refiners have been validated as conflict-free or not and to identify the countries of origin of the minerals.' However, no further details found including which are the risks identified. The Company also provides a list of countries of origin identified, pointing out to those considered as 'Covered Countries'. [Conflict Minerals Report for 2018, 30/5/2019: nokia.com] • Met: Identification of smelter/refiners and OECD due diligence: The Company carries out inquiry surveys with suppliers, based on OECD Guidance, 'with the aim of assessing the direct suppliers' due diligence activities and identifying processing facilities and countries of mineral origin". The Company indicates that it makes use of the cross-industry conflict-free smelter listing of the RMAP, as it does not carries out assessments of smelters itself. "We compare the aggregated smelter and refiner list of our supply chain against the validated smelter and refiner lists provided by the RMAP". The Company identified that 32 out of 1297 total suppliers are not conflict-free for all minerals. [Conflict Minerals Policy, 2016: nokia.com & Conflict Minerals Report for 2018, 30/5/2019: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses smelters/refiners judged in line with OECD due diligence: The Conflict Minerals report includes lists of smelters/refiners judged by the Responsible Minerals Assurance Process. These lists include smelters found to be conformant, participant, and non-participant. [Conflict Minerals Report for 2018, 30/5/2019: nokia.com] • Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes mineral risk management plan for supply chain: The Company describes the following: 'As part of risk management with our direct suppliers, we provide them feedback on the quality of their conflict minerals due diligence information and ask clarifying questions and demand corrective actions where necessary. We have set up informational calls with selected suppliers to help build their capacity[...]. We also conduct an audit program for the suppliers in higher risk countries, such as China on their due diligence process. When suppliers have identified in their conflict minerals survey that some of the minerals originate from the Covered Countries, we perform additional due diligence to find out as much as reasonably possible about the origins of the metals. This involves asking suppliers to identify the smelter or refiner that processed the material and checking whether it has been validated as conflict-free. We also liaise directly with smelters that have not yet been validated as conflict-free in order to request mineral origin information. As part of our risk management we aim to increase the portion of validated conflict-free smelters and refiners in our supply chain, with the aim of ultimately sourcing only from validated processing facilities'. However, it is unclear how this information is used to manage risks identified. [Conflict Minerals Report for 2018, 30/5/2019: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time: 'Risk management plans, monitoring and performance tracking is done in close collaboration with sourcing and followed up by the cross-functional conflict minerals working group that oversees the implementation of the Policy. The results are reported to Sourcing category leaders and also back to Head of Supply Quality and Corporate Responsibility Council. Where risk incidents involve direct suppliers, we carry out risk management planning, monitoring and performance tracking through the sourcing managers' network. [...] In cases where our regular annual supply chain inquiry indicates that a given supplier is sourcing materials from the Covered Countries, we undertake additional risk management activities, such as checking the reported mine of origin against industry data and public sources of information, and follow-up of the status periodically.' However, no information found as to whether there has been improvement. [Conflict Minerals Report for 2018, 30/5/2019: nokia.com] Score 2 <ul style="list-style-type: none"> • Not met: Supplier and stakeholders engaged in risk management strategy • Not met: Responsible conflict mineral sourcing covers all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 19.53 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.88 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.73 out of 4	Out of a total of 44 indicators assessed under sections A-D of the benchmark, Nokia made data public that met one or more elements of the methodology in 19 cases, leading to a disclosure score of 1.73 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The People and Planet Report is 'prepared in accordance with the Global Reporting Initiative GRI Standards, Core-option.' [GRI Content Index, 2017: nokia.com]
F.3	Key, High Quality Disclosures	0.5 out of 4	Nokia met 1 of the 8 thresholds listed below and therefore gets 0.5 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHR B Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.