

Company Name Nokia
Industry ICT (Supply Chain only)
Overall Score 20.8 out of 100

Theme Score	Out of	For Theme
2.7	10	A. Governance and Policies
4.3	25	B. Embedding Respect and Human Rights Due Diligence
7.0	20	C. Remedies and Grievance Mechanisms
3.7	25	D. Performance: Company Human Rights Practices
3.1	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Universal Declaration of Human rights (UDHR): The Code states that 'Nokia is committed to the principles of the Universal Declaration of Human Rights'. [Code of Conduct, 2021: nokia.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to the UNGPs: The Company indicates in the third party code that 'Nokia is committed to respect and support the Human Rights principles and values laid out in (...) the United Nations Guiding Principles on Business and Human Rights'. [Third party Code of Conduct, 2021: nokia.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Third party code indicates that 'Nokia is committed to respect and support the Human Rights principles and values laid out in (...) the International Labor Organization's Declaration on Fundamental Principles'. [Third party Code of Conduct, 2021: nokia.com] <ul style="list-style-type: none"> Not Met: Company has an explicit commitment to All four ILO Core: See above. In addition, the Code of Conduct states that 'Nokia does not tolerate [...] child labor, forced labor. (...) Discrimination, harassment, and retaliation, in any form, are prohibited'. The Human Resources Framework states: 'Employees are also free to join, not join or leave unions and associations of their own choice and select their representatives according to the local practices'. The Company states that 'within Nokia's governance model this Framework is called a Policy, which governs all the Human Resources processes and practices'. However, it is not clear whether it is committed to respect the right to collective bargaining and respect these (freedom of association and collective bargaining) rights in all contexts and locations (i.e.

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			<p>alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'according to the local practices. In the context of its Human Rights Due Diligence (HRDD) case examples, the 2021 People & Planet Report indicates: 'Nokia will, in situations where conflict may exist between local law or its interpretation and the generally accepted international human rights standards, strive to resolve that conflict in a manner that best respects human rights'. However, this piece of evidence is found in a report and according to CHRB standards, commitments have to be found in formal policy statements. No formal policy statement including commitment to respect collective bargaining rights, and to provide alternative mechanisms where these (freedom of association and collective bargaining) rights are not allowed under 'local practices'. [Code of Conduct, 2021: nokia.com] & [Global Human Resources Framework, 3/2020: nokia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The Third Party Code of Conduct indicates: 'We expect Nokia Third Parties to ensure that the principles set out in this Code are implemented and communicated throughout their organization, making it available to its employees and to those sub-third parties that work on behalf of Nokia'. It also indicates: 'Nokia is committed to respect and support the Human Rights principles and values laid out in the [...] the International Labor Organization's Declaration on Fundamental Principles and Rights at Work [...]'. [Third party Code of Conduct, 2021: nokia.com] • Not Met: Company explicitly list All four ILO for suppliers: The Third Party Code of Conduct indicates its expectations: 'Do not engage in or support discrimination (...) Employment should be considered a matter of free will; labor, involuntary servitude, and child labor are prohibited'. The website section 'Supplier Requirements' indicates that 'we have adopted the Responsible Business Alliance (RBA) Code of Conduct which is further enhanced with our own existing Nokia specific supplier requirements'. The RBA Code states that 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. Previous assessment used evidence from 'An overview of our supplier requirements on Corporate Responsibility', which is not considered a suitable source for policy statements under CHRB revised approach. [Third party Code of Conduct, 2021: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: The Company will 'Provide healthy and safe working conditions and promote well-being and fair treatment at work'. [Health, Safety and Labour Conditions Policy, 01/2020: nokia.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Third Party Code of Conduct indicates: 'Nokia is committed to respect and support the Human Rights principles and values laid out in the [...] the International Labor Organization's Declaration on Fundamental Principles and Rights at Work [...]'. Additionally, the 2021 People & Planet Report notes: 'We do not permit our people to work more than what is legally allowed. We define regular working hours in accordance with local laws. Young workers from 15 to 18 years old (or as specified by local legislation) are not permitted to carry out work that may be hazardous, unsafe, or unhealthy. Such workers are not allowed to work night shifts and they have a maximum daily working time of eight hours. We provide guidance through the worktime standard operating procedure and guarantee the minimum one day off in every seven days in our production operations'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. According to CHRB standards, commitments are expected to be placed in Company policy documents. [Third party Code of Conduct, 2021: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: 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, 01/2020: nokia.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Third Party Code of Conduct indicates that 'Comply with all applicable laws and regulations concerning wages, hours and conditions of employment'. Moreover, The website section 'Supplier Requirements' indicates that 'we have adopted the Responsible Business Alliance (RBA) Code of Conduct which is further enhanced with our own existing Nokia specific supplier requirements'. The RBA Code indicates that 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. Previous assessment used evidence from the document 'An overview of our supplier requirements on Corporate Responsibility'. However, the overview document is no longer meets CHRB standards, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Third party Code of Conduct, 2021: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	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: Responsible mineral sourcing: The Company describes 'our commitment and our requirements towards socially and environmentally responsible sourcing of materials that go into our products. We recognize the risk that the illegal extraction and trade of materials [...] is fuelling military conflict in some countries and may also cause human rights violations and environmental degradation'. [Responsible Minerals Policy, 02/09/2019: nokia.com] • Met: Based on OECD Guidance: The Company states in the SD Conflict minerals that 'In the design of our due diligence processes we have conformed to the internationally recognized due diligence framework provided by OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD 2016)(the "OECD Due Diligence Guidance")'. This report is considered a proxy for policy statements under CHRB revised approach. • Met: Requires suppliers to commit to responsible mineral sourcing: Following the explanation above regarding responsible sourcing, the Company indicates the following: 'We therefore require that our suppliers must commit to sourcing those materials from environmentally and socially responsible sources only. Materials, which either directly or indirectly contribute to conflict, are unacceptable'. [Responsible Minerals Policy, 02/09/2019: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals: The Company indicates 'We actively work to find a sustainable solution to the issue of minerals sourcing to ensure responsible and conflict-free sourcing through legitimate trade and positive development in the affected regions as well as expanding our scope of materials due-diligence going beyond Conflict Minerals [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. [Responsible Minerals Policy, 02/09/2019: nokia.com] • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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: Women's rights: The 2021 People & Planet Report indicates: 'In 2021, Nokia signed the Women Empowerment Principles (WEPs)'. A commitment to the Women's Empowerment Principles (WEP) is a proxy for 'respecting women's rights, according to CHRB standards. [2021 People & Planet Report, 26/03/2022: nokia.com] • Met: Expects suppliers to respect at least one of these rights: According to the RBA Code: Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, (...) and any other type of worker'. The website section 'Supplier Requirements' indicates that 'we have adopted the Responsible Business Alliance (RBA) Code of Conduct which

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			<p>is further enhanced with our own existing Nokia specific supplier requirements'. [RBA Code v.7, 2021: responsiblebusiness.org] & [Supplier Requirements on web, N/A: nokia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The 2021 People & Planet Report indicates: 'In 2021, Nokia signed the Women Empowerment Principles (WEPs)'. A commitment to the Women's Empowerment Principles (WEP) is a proxy for 'respecting women's rights, according to CHRB standards. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Expecting suppliers to respect these rights: The Code of Conduct indicates: 'Nokia is committed to the principles of the Universal Declaration of Human Rights and the United Nations Global Compact, and we expect our suppliers and business partners to share these values. Nokia seeks to ensure that materials used in our products come from socially responsible sources. We do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights. 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 in which we operate or in any part of our global supply chain'. The Human Rights Policy also indicates: 'We also expect our suppliers and business partners share these values to ensure that communications technology and our business respects and support human rights'. However, no evidence found that the Company expects suppliers to committing it to respect women's rights also refers to the relevant part(s) of the Convention on the Elimination of Discrimination Against Women (CEDAW) or of the Women's Empowerment Principles or the company's publicly available policy statement committing it to respect children's rights also refers to the relevant part(s) of the Convention on the Rights of the Child or of the Children's Rights and Business Principles or the company's publicly available policy statement committing it to respect migrant workers' rights also refers to the relevant part(s) of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. [Code of Conduct, 2021: nokia.com] & [Human Rights Policy, 2022: nokia.com]
A.1.4	Commitment to remedy	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: The Company commits to remedy: The Health, Safety and Labour Conditions Policy indicates: 'Take immediate action to remedy situations where incidents, audits and feedback identify areas for improvement in our health, safety and labor conditions management'. The Code of Conduct states: 'Take immediate action to remedy situations in which incidents, audits, and feedback highlight areas for improvement in Nokia's environmental management'. However, no policy statement found committing it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to beyond these contexts. The 2021 People & Planet Report notes: 'We offer multiple channels to report ethical concerns'. It then provides data on its grievance channel. However, no commitment to remedy found. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Health, Safety and Labour Conditions Policy, 01/2020: nokia.com] & [Code of Conduct, 2021: nokia.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: Board level responsibility for HRs: The webpage Board of Directors states: 'Under our Corporate Governance Guidelines, the Board evaluates Nokia's environmental and social activities and governance practices (ESG), related risks and target setting as well as their implementation and effectiveness in the Company. [...] In addition, the Board Committees monitor environmental and social developments and activities in the Company in their respective areas of responsibilities. During 2021, the Audit Committee's responsibilities included, amongst others, the implementation planning of new climate and other sustainability reporting requirements, as well as oversight of the ethics and compliance program [...]. The Audit Committee also annually reviews sustainability disclosures as well as the use of conflict minerals in Nokia's products resented in the annual reports and the related regulatory filings. The Personnel Committee assists the Board in the incorporation of the ESG-related metrics in the incentive structures and oversees the human capital management, including personnel policies and practices related to Nokia culture, employee wellbeing, diversity, recruiting, development and retention. Corporate Governance and Nomination Committee assesses and advises the Board in the environmental, social and governance (ESG) related activities and practices aiming to enhance governance structure supporting them. The Technology Committee reviews how sustainability is embedded into our technology strategy and roadmaps'. ESG includes human rights. [Board of Directors (web), N/A: nokia.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: Former CEO published a letter on the Company's website 'Human rights and the world today', where he explains the Company's position with respect human rights, including the following statements: 'we believe that a more connected world is a better world, with the technologies we build helping to support human rights, free expression, the exchange of ideas and information, and economic development. [...] we believe that companies, like ourselves, have a responsibility to ensure their products and services respect and promote human rights'. [CEO Letter: Human Rights and the world today, 07/05/2020: nokia.com]
A.2.2	Board responsibility	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: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period: The Company states that 'In 2021, the Board approved the select key ESG targets on climate change and diversity included in the short-term incentive program and also reviewed the evolving ESG requirements and expectations, investor feedback and the disclosure approach'. No further details found. The 2021 People & Planet Report notes: 'The Nokia Group Leadership Team (GLT) is chaired by the President and CEO. In 2021, the Chief Corporate Affairs Officer had overall responsibility for sustainability in the GLT. In line with our new mode of operation, the GLT approves sustainability related strategy, targets and operational frameworks, within which corporate functions and business groups can operate. This enables the accountability and empowerment of each business group while maintaining appropriate strategic and operative oversight. Independent councils and committees, such as the Sustainability Council, are used to steer, align and ensure the implementation of these strategies, targets and frameworks and make recommendations to the GLT. [...] Nokia governance meetings and committees where GLT members participate and where sustainability related topics are frequently reviewed include, for example [...] Human Rights Due Diligence Governance Council'. However, this indicator looks for supervisory board people or committee discussions. Evidence seems to refer to executive level. [2021 Annual Report, 05/04/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	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: Incentives for at least one board member: The 2021 Annual Report indicates: 'In 2021, the Board approved the select key ESG targets on climate change and diversity included in the short-term incentive program'. However, it is not clear what this diversity target entails. No further details found. The Company

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>also provides, in its feedback to CHRB, details of its risk management system, which are found in the Annual Report. In its The 2021 People & Planet Report, it discloses its human rights framework, including Human rights impact, Potential risk mitigation, Grievance mechanisms and Measurement. It covers: Nokia employees, Technology misuse, Nokia supply chain. Diversity is included in 'measurement' for Nokia employees. It is not clear, whether, and how risk management of specific human rights risks are included in supervisory board members incentives. [2021 Annual Report, 05/04/2022: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com]</p> <ul style="list-style-type: none"> • Not Met: At least one key HR risk, beyond employee H&S: It is not clear what the diversity target entails. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	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: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	0.5	<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: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: According its Sustainability Report: 'Our Chief Marketing Officer (CMO) is responsible for sustainability at the executive management level. During the year, sustainability related topics were reviewed during CMO management team monthly meetings.' Sustainability covers human rights issues. [People and Planet Report (Sustainability Report 2019), 03/2020: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The Company indicates that HRDD [Human Rights Due Diligence] is centrally managed by a full-time Head of Human Rights who reports to a senior manager, using a global process to ensure accountability, reportability and consistent practices across Nokia. The Head of Human Rights function is part of the Sustainability team in Corporate Affairs and works across the entire business ecosystem from business groups to sales to ensure adherence to the Human Rights Policy'. [2021 Annual Report, 05/04/2022: nokia.com] • Not Met: Day-to-day resources and expertise allocation in own ops: Also, according to the 2021 Annual Report: 'The Human Rights Panel, chaired by the Head of Human Rights, is a cross functional senior group including technical, legal, marketing and communications senior experts that is called upon when needed to analyse cases from all angles in terms of potential risk to Human Rights'. it is not clear, however, if these entails day-to-day management, as it seems to meet when specific a context or situation requires so. The 2021 People & Planet Report indicates: 'We have a Human Rights Due Diligence (HRDD) process that targets our most salient risk regarding the potential misuse of the technology we provide. [...] The process examines a country's long-term commitment to upholding Human Rights, the intended use of the technology in question and the customer type, in order to identify potential risks early in the process and trigger the required HRDD investigation and senior-level approval/denial review where needed. For country risk ratings, we use an external assessment provider'. However, no further description found of how it allocates resources for day-to-day management of relevant human rights issues. [2021 Annual Report, 05/04/2022: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Resources and expertise allocation in the supply chain: The 2021 People & Planet Report indicates: ‘We have robust 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 and inclusion and diversity. [...] Our key supplier-related monitoring, assessment and auditing activities include an onsite audit program, EcoVadis assessment, our in-house developed Health & Safety maturity assessments, [...] Our onsite audit program is aligned with SA8000 methodology and includes document reviews, interviews with managers and employees, site visits, inspections of facilities, production lines, and warehouses. [...] In addition, we conduct specific in-depth CR audits on our existing suppliers. [...] We also conduct supplier training to provide awareness of potential dangers related to their work and to ensure the correct safety equipment is used as required’. However, although the Company indicates various efforts it makes to run its supply chain, it is not clear how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its supply chain (i.e teams or units, amount of people, where are these allocated, etc.). [2021 People & Planet Report, 26/03/2022: nokia.com]
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights: According to its 2021 Annual Report, part of the CEO remuneration comes from short-term incentives that include ‘environment, social and governance objectives’. It also indicates: ‘In 2021, the Board approved the select key ESG targets on climate change and diversity included in the short-term incentive program’. In its 2021 People & Planet Report, it discloses its human rights framework, including Human rights impact, Potential risk mitigation, Grievance mechanisms and Measurement. It covers: Nokia employees, Technology misuse, Nokia supply chain. Diversity is included in ‘measurement’ for Nokia employees. It also notes: ‘The Nokia Group Leadership Team (GLT) is chaired by the President and CEO. In 2021, the Chief Corporate Affairs Officer had overall responsibility for sustainability in the GLT. In line with our new mode of operation, the GLT approves sustainability related strategy, targets and operational frameworks, within which corporate functions and business groups can operate. This enables the accountability and empowerment of each business group while maintaining appropriate strategic and operative oversight. Independent councils and committees, such as the Sustainability Council, are used to steer, align and ensure the implementation of these strategies, targets and frameworks and make recommendations to the GLT. [...] Nokia governance meetings and committees where GLT members participate and where sustainability related topics are frequently reviewed include, for example [...] Human Rights Due Diligence Governance Council’. However, it is not clear how specifically the ‘social’ as well as the ‘diversity’ aspect of this incentive is linked to its human rights policy commitment. No further evidence found. [2021 Annual Report, 05/04/2022: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance: The 2021 People & Planet Report indicates: ‘The Nokia Group Leadership Team (GLT) is chaired by the President and CEO. In 2021, the Chief Corporate Affairs Officer had overall responsibility for sustainability in the GLT. In line with our new mode of operation, the GLT approves sustainability related strategy, targets and operational frameworks, within which corporate functions and business groups can operate. This enables the accountability and empowerment of each business group while maintaining appropriate strategic and operative oversight’. However, it is not clear that it has reviewed other senior management performance incentives to ensure coherence with its human rights policy commitment. [2021 People & Planet Report, 26/03/2022: nokia.com]
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The 2021 Annual Report indicates: ‘Sustainability risks and opportunities are part of our Enterprise Risk Management framework with multi-disciplinary company-wide risk identification, assessment, and management processes. [...] These risks include sustainability-related issues such as: [...] health & safety, potential human rights abuse through misuse of the technology we provide; potential lack of proper respect for human rights, fair labor conditions, the environment and communities in our operations and supply chains’. The Risk Factor section of the report specifies some of these risks: ‘Performance capabilities of our partners and suppliers and

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			<p>their high standards to meet product quality, health, safety or security requirements or comply with other regulations or local laws, such as environmental or labor laws; [...] Our products, services and operations meeting all relevant quality, health, safety or security standards and other recommendations and regulatory requirements globally'. [2021 Annual Report, 05/04/2022: nokia.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example: Although the Company indicates how Human Rights related aspects are part of its Enterprise Risk Management, no further examples found of how it manages them, within this system; or, in case of their occurrence, examples of the negative impacts it may have to the Company. [2021 Annual Report, 05/04/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment: The Human Rights Policy indicates: 'Nokia will seek to prevent the sale of our products and services in cases where we believe there is a significant potential that those products or services could be used to infringe human rights. To assess such situations, we have a senior-level internal review process that focuses on sales in countries that have been deemed by an independent expert as presenting a high human rights risk'. The 2020 MSA notes: 'We work with Verisk Maplecroft for an independent view of the potential risks of modern slavery globally'. According to the 2021 People & Planet Report: 'The Audit Committee also reviews annually sustainability disclosures as well as the use of conflict minerals in Nokia's products presented in the annual reports and related regulatory filings'. Also: 'We are a Board member of the Global Network Initiative (GNI) [...] Companies participating in GNI are independently assessed every two to three years on their progress in implementing the GNI Principles'. However, although the Company indicates different means for reviewing various Human Rights related processes, it is not clear how it assesses specifically the adequacy of the enterprise risk management system in managing human rights during the company's last reporting year. The assessment was either overseen by the Board Audit Committee or conducted by an independent third party. [Human Rights Policy, 2022: nokia.com] & [2020 MSA, 2021: nokia.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external 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: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company discloses the following: 'We require employees to acknowledge the Nokia Code of Conduct, which is cascaded to Ethical business and corporate governance our employees as part of our annual mandatory compliance training. The Code is accessible from various resources, including a company mobile app, and online versions in 23 languages'. It includes human rights covered by the Benchmark. [People and Planet Report (Sustainability Report 2019), 03/2020: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Third Party Code of Conduct indicates: 'This Third-Party Code of Conduct sets forth Nokia's expectations of its Third Parties and is based on the values and principles set forth in Nokia's Code of Conduct, available on our website'. However, it is not clear how the Company proactively communicates its policy commitments to affected stakeholders, including local communities. [Third party Code of Conduct, 2021: nokia.com] • Not Met: How policy commitments are made accessible to audience: In its feedback to CHRB, the Company indicates that all the Human Rights related policies and commitments are publicly available. However, this indicator looks for a description of how it ensures the form and frequency of the information communicated is accessible to its intended audience.
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2 • Met: Requires suppliers to communicate policy requirements: The website section Supplier requirement indicates: 'Our Supplier Requirements are communicated to our suppliers through supplier contracts, and we expect our suppliers to commit to these as part of their contractual obligations'. Moreover, the document An overview of our supplier requirements on Sustainability reinforces that Supplier Requirements is part of our contractual agreements with suppliers and notes: 'To promote sustainable improvements throughout the supply chain, we ask our suppliers to put in place similar sustainability requirements for their own suppliers'. [Supplier Requirements on web, N/A: nokia.com] & [An overview of our supplier requirements on Sustainability, N/A: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The website section Supplier requirement indicates: 'Our Supplier Requirements are communicated to our suppliers through supplier contracts, and we expect our suppliers to commit to these as part of their contractual obligations'. [Supplier Requirements on web, N/A: nokia.com] • Not Met: Company requires suppliers to cascade down to their suppliers: The website section Supplier requirement indicates: 'Our Supplier Requirements are communicated to our suppliers through supplier contracts, and we expect our suppliers to commit to these as part of their contractual obligations'. Moreover, the document An overview of our supplier requirements on Sustainability reinforces that Supplier Requirements is part of our contractual agreements with suppliers and notes: 'To promote sustainable improvements throughout the supply chain, we ask our suppliers to put in place similar sustainability requirements for their own suppliers'. However, it is not clear it expects suppliers to cascade the requirements in form of contracts or other binding requirements. [Supplier Requirements on web, N/A: nokia.com] & [An overview of our supplier requirements on Sustainability, N/A: nokia.com]
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Met: How workers are trained on HR policy commitments: The Company discloses the following: 'We require employees to acknowledge the Nokia Code of Conduct, which is cascaded to Ethical business and corporate governance our employees as part of our annual mandatory compliance training. The Code is accessible from various resources, including a company mobile app, and online versions in 23 languages'. The Code includes human rights covered by the Benchmark. [People and Planet Report (Sustainability Report 2019), 03/2020: nokia.com] • Met: Trains relevant 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, 06/2020: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Met: Meets both requirements under score 1: See above. • Met: Trains suppliers to meet company's HR commitment: Regarding supplier capacity building, it indicates: 'In 2021, our supplier workshops were also conducted fully online. Following growing concerns around mistreatment of ethnic and other minorities globally, we have conducted refresher training sessions regarding modern slavery, and inclusion and diversity for our suppliers located in high-risk countries, conducted further risk assessments, and carried out a supplier survey around inclusion and diversity. All together we ran 21 supplier training workshops on diversity and Inclusion, modern slavery, responsible minerals sourcing and climate change, and health and safety'. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Disclose % trained
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"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2 • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: Regarding its onsite audit program for suppliers, it indicates: 'Our onsite audit program is aligned with SA8000 methodology and includes document reviews, interviews with managers and employees, site visits, inspections of facilities, production lines, and warehouses. Our general audit covers the full set of supplier requirements, including corporate responsibility (CR) requirements, and are often used with new high-risk suppliers or suppliers where there has been significant change in business or location. In addition, we conduct specific in-depth CR audits on our existing suppliers. In 2021, we conducted altogether 439 supply chain audits and EcoVadis assessments'. It also conducts 'in-depth CR audits'. However, it is not clear how it monitors the implementation of its human rights policy commitment across its global operations. . [2021 People & Planet Report, 26/03/2022: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored: The Company indicates: 'In 2021, we conducted altogether 439 supply chain audits and EcoVadis assessments'. EcoVadis sustainability assessments represent 66% of supplier spend. However, it is not clear the total proportion of its supply chain that it represents as the Company does not seem to disclose the proportion that its supply chain audits covers. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Describe how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a: See A.1.2 • 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: 'Audit closure continues to be a challenge. We target to close CR [Corporate Responsibility] onsite audit findings within six months of audit. In 2019, 52% of audits were closed within this time (52% in 2018). We continue to emphasize this as an issue which needs constant vigilance and improvement.'. It also reports: 'Of the 476 instances of non-compliance, 210 related to health and safety and 64 to environment.'. In addition, it indicates that 1 non-compliance was related with forced labour, 10 with freedom of association, 3 discrimination, and 29 with working hours. [People and Planet Report (Sustainability Report 2019), 03/2020: nokia.com] • Not Met: Disclose findings and number of corrective action: The Company discloses the findings of its 'in-depth corporate responsibility supplier audits' (64 out of total 439 supplier audits and assessments), including the list of issues, instances of non-compliance, number of potential risk areas identified and total number of recommendations for improvement. The Company also indicates: 'As a result of the [in-depth] audits, 307 improvement recommendations were made which are addressed through corrective action plans'. However, this information seems to refer to its in-depth corporate responsibility supplier audits. It is not clear it discloses the findings and number of corrective action process as a result of the monitoring process as a whole. [2021 People & Planet Report, 26/03/2022: nokia.com]
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers: It indicates: 'The HRDD [human rights due diligence] triggers are a mandatory part of the sales approval process'. However, no further description found of how human rights performance is taken into account in the identification and selection of potential business relationships, including suppliers. Previous assessment was based on 'People and Planet' report 2017, which is now out of the three-year timeframe that the methodology requires [2021 People & Planet Report, 26/03/2022: nokia.com] • Met: HR affects on-going supplier relationships: The 2019 Sustainability Report states: 'We have 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 the Conflict Minerals program contribute to our sustainability pillar which is one of the six pillars of our Supplier Performance Evaluation. Furthermore, there are performance requirements set for our Preferred and Allowed status suppliers across performance categories'. Moreover, the Code of Conduct notes: 'Nokia will terminate business relationships with third parties who engage in questionable or unlawful business practices'. [People and Planet Report (Sustainability Report 2019), 03/2020: nokia.com] & [Code of Conduct, 2021: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe positive incentives offered to respect human rights: The Company indicates: 'We also use EcoVadis sustainability assessments to review the environmental, labor, health, safety, ethics, and sustainable procurement management systems of our suppliers with a tailored questionnaire and supporting document reviews. Responses are scored by an analyst'. The Sustainability report indicates that 'We review category strategies annually with our purchasing category leads. Failing to meet established sustainability requirements will block a supplier from being promoted, for example, from restricted to allowed, or to preferred supplier'. [Modern Slavery Statement 2019, 06/2020: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com] • Met: Working with suppliers to meet HR requirements: The Company indicates: 'We also provide corporate responsibility related awareness and competence development to our suppliers through online training, webinars, and onsite training workshops. In 2019, we ran 6 (11 in 2018) training workshops for suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			operating in China, India, Jordan, Mexico, Pakistan, and Vietnam. We expect and encourage our suppliers to cascade provided training materials to their entire personnel and to the next supplier tier'. In previous report it indicated 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 (Sustainability Report 2019), 03/2020: nokia.com] & [People and Planet Report 2018, 5/2019: nokia.com]
B.1.8	Approach to engagement with affected stakeholders	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: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company lists its stakeholders. It includes employees, suppliers and partners and civil society. It also explains the approach taken with each stakeholder. When disclosing information about its monitoring system within supply chain, it indicates: 'Our onsite audit program is aligned with SA8000 methodology and includes document reviews, interviews with managers and employees, site visits, inspections of facilities, production lines, and warehouses'. The audits seem to be an on-going process. However, no further description found on how it has identified and engaged affected stakeholders. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders: The Company indicates that it onsite audits program includes interviews with managers and employees. No further details found of examples of engagement with affected stakeholders whose human rights have been affected by activities. [2021 People & Planet Report, 26/03/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: The 2021 People & Planet Report indicates: 'In 2021, we continued to carry out human rights impact assessments of geographies relevant to our business as part of an ongoing cycle. We have a Human Rights Due Diligence (HRDD) process that targets our most salient risk regarding the potential misuse of the technology we provide. It is a pre-emptive process applied before any sale is made and is used to identify the potential risk level to human rights through potential misuse of our technology'. Also: 'The process examines a country's long-term commitment to upholding Human Rights, the intended use of the technology in question and the customer type, in order to identify potential risks early in the process and trigger the required HRDD investigation and senior-level approval/denial review where needed. For country risk ratings, we use an external assessment provider'. However, no description found of the process it uses to identify its human rights risks and impacts in specific locations or activities, covering its own operations. Current process seems to focus on the assessment of the selling of technological products to potential customers and its possible human rights impacts. The 2021 Annual Report notes: 'Sustainability risks and opportunities are part of our Enterprise Risk Management framework with multi-disciplinary company-wide risk identification, assessment, and management processes. We recognize and aim to mitigate the potential risks and negative impacts associated with our business whether related to technology, supply chain, climate or people, while also driving the opportunities within and beyond our business in order to contribute to achieving the UN Sustainable Development Goals. [...] In addition, the "Risk factors" section of this report provides discussion on the most important risk factors affecting our operations. These risks include sustainability-related issues such as: [...] health & safety; [...] potential human rights abuse through misuse of the technology we provide; potential lack of proper respect for human rights, fair labor conditions, the environment and communities in our operations and supply chains'. Moreover, 'Key risks and opportunities are reviewed by the Group Leadership Team and the Board in order to create visibility on business risks as well as to enable prioritization of risk management activities. Overseeing risk is an integral part of the Board's deliberations. [...] We also have an internal audit function that examines and evaluates the adequacy and effectiveness of our system of internal control'. However, it is not clear the due diligence process that the Company uses to identify its human rights risks and impacts in related to labour and peoples rights covering its own operations. [2021 People & Planet Report, 26/03/2022: nokia.com] & [2021 Annual Report, 05/04/2022: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Identifying risks through relevant business relationships: The 2020 MSA indicates: 'Our in-depth audits covering labor conditions and environmental management for our existing suppliers are specific corporate responsibility deep-divide audits. Implementation of these audits is aligned with the SA8000 methodology, and the audits cover document reviews, interviews with managers and employees, and site visits, as well as inspections of facilities, production lines, and warehouses. Our audits include tier 1 and tier 2 suppliers and Due diligence and training we expect and encourage our suppliers to audit their next tier suppliers as one of our official supplier requirements. (...) We use EcoVadis sustainability assessments with a tailored questionnaire and supporting document review to assess the environmental, labor, health, safety, ethics, and sustainable procurement management systems of our suppliers. Responses are scored by an analyst. We continue to look closely at our top 20 final assembly factories through monthly monitoring on core labor KPIs: working hours, rest day, and percentage of contracted labor. We report publicly on the types and numbers of findings from these audits in our annual sustainability report'. It also indicates its efforts to identify the part of supply chain most at risk: 'Our suppliers fall into three broad categories: hardware suppliers for product materials, services suppliers who support the provision of services to our customers, for example, in installation and construction of the networks we sell, and indirect suppliers for everyday goods and services we need to run our business such as IT, software, legal and marketing. The majority of our manufacturing suppliers are based in Asia, whereas our services suppliers are located around the world. In 2020, we had approximately 12 000 suppliers and around 80 percent of our total supplier spend was distributed across approximately 400 suppliers. We work with Verisk Maplecroft for an independent view of the potential risks of modern slavery globally'. Although the Company indicates it has various auditing tools, and that it tries to identify suppliers at most risk, it is not clear they are integrated in a proactive due diligence process of identification of human rights risks and impacts process as current evidence seems to focus on compliance. The description should include the process it uses to identify which are its potential human rights risks and impacts (i.e desk documentation review, expert and affected stakeholder consultation, use of databases, etc.) [2020 MSA, 2021: nokia.com] Score 2 • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The 2021 MSA indicates: 'We work with Verisk Maplecroft for an independent view of the potential risks of modern slavery globally. [] Verisk Maplecroft, a research firm specialising in global risk analytics and country risk insight'. It also indicates, as mentioned above, that it has different auditing tools to manage compliance within its supply chain. Although the Company indicates that it works Verisk Maplecroft, no further description of its the global systems it has in place to identify its human rights risks and impacts on a regular basis across its activities involving consultation with affected stakeholders as well as with internal or independent external human rights experts beyond slavery risks. [2020 MSA, 2021: nokia.com] • Not Met: Triggered by new circumstances: The 2021 People & Planet Report indicates: 'COVID-19 and our supply chain human rights risk auditing: While COVID-19 and related precautions have continued to restrict the possibility of conducting onsite audits, we carried out assessments and monitoring of suppliers with more focus on remote tools and virtual interaction'. In the report, it also discloses projects it has to tackle the digital divide and different auditing tools. However, no description found of how its proactive process to identify human rights risks and impacts are triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Describes risks identified: The Company discloses, in its 2021 Annual Report, sustainability related risks within its Enterprise Risk Management framework. It includes: 'health & safety, potential human rights abuse through misuse of the technology we provide; potential lack of proper respect for human rights, fair labor conditions, the environment and communities in our operations and supply chains'. However, it is not clear those are risks identified specifically in relation to new country operations, new business relationships, new human rights challenges or conflict affecting particular locations, including through heightened due diligence in any conflict-affected areas. [2021 Annual Report, 05/04/2022: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing human rights risks and impacts	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: Describe process for assessment of HR risks and discloses salient HR issues: The 2021 People & Planet Report indicates: ‘In 2021, we continued to carry out human rights impact assessments of geographies relevant to our business as part of an ongoing cycle. We have a Human Rights Due Diligence (HRDD) process that targets our most salient risk regarding the potential misuse of the technology we provide’. The Human Rights Policy indicates: ‘The most salient human rights risks related to our company and business involve the potential misuse of the technology we provide’. However, it is not clear the Company has a process for assessing its human rights risks (covered by this benchmark including labour related risks). This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors. Current process seems to focus on the assessment of the selling of technological products to potential customers and its possible human rights impacts. [2021 People & Planet Report, 26/03/2022: nokia.com] & [Human Rights Policy, 2022: nokia.com] • Not Met: How process applies to supply chain: The 2020 MSA explain how it identifies the part of supply chain most at risk: ‘Our suppliers fall into three broad categories: hardware suppliers for product materials, services suppliers who support the provision of services to our customers, for example, in installation and construction of the networks we sell, and indirect suppliers for everyday goods and services we need to run our business such as IT, software, legal and marketing. The majority of our manufacturing suppliers are based in Asia, whereas our services suppliers are located around the world. In 2020, we had approximately 12 000 suppliers and around 80 percent of our total supplier spend was distributed across approximately 400 suppliers. We work with Verisk Maplecroft for an independent view of the potential risks of modern slavery globally. Also: ‘Our materiality analysis and Enterprise Risk Management help identify potential supply chain risks and we carry out more in-depth analyses to determine all supply chain risks. The outcomes are included in our purchasing category strategies related to nature and size, as well as monitoring and performance related requirements. We review category strategies annually. We also review the supplier location and business context. This approach helps ensure responsible purchasing practises across the company. We furthermore run 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 requirements, and are often used with new high-risk suppliers or suppliers where there has been significant change in business or location’. However, it is not clear the process it has in place for assessing its human rights risks. This description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. The Company has also provided evidence related to its Due Diligence Guidance for Responsible Supply Chains of Minerals. However, responsible minerals risks and impacts are assessed in indicators D.4.10.a/b/c. [2020 MSA, 2021: nokia.com] • Met: Public disclosure of the results of HR assessment: The Company discloses its 'Human Rights Framework', where it summarizes human rights impacts related to Employees (Labor rights, Health, Safety, Wellbeing, Decent working conditions, Compensation), Technology Misuse (Freedom of expression and privacy), and its Supply Chain (Labor conditions, freedom of expression, compensation, health and safety, corruption). [2021 People & Planet Report, 26/03/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1: See above. • Not Met: How it involved affected stakeholders in the assessment: The 2021 MSA indicates: ‘In 2020, on a global scale, concerns around mistreatment of ethnic and other minorities increased. We have conducted further risk assessment, updated and carried out a training session concentrating on modern slavery for our suppliers globally, and strengthened our Corporate Responsibility auditing guidelines to communicate our requirements concerning the treatment of ethnic or any other minorities and the appropriate actions to be taken. We also set up related key performance indicators in our existing monitoring programs such as EcoVadis, and will be reporting our annual progress against these indicators [...]. We understand that the issues surrounding minorities are global and not confined to one region or country. As a result, we have rolled out Inclusion and Diversity virtual/live sessions’. However, although the Company indicates that it conducted virtual sessions on Inclusion and Diversity, it is not clear how affected stakeholders are involved in the assessment process to determine saliency of potential risks. The Company has also provided evidence related to its Due Diligence Guidance for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Responsible Supply Chains of Minerals. However, responsible minerals risks and impacts are assessed in indicators D.4.10.a/b/c. [2020 MSA, 2021: nokia.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Action Plans to mitigate risks: The 2020 MSA indicates: 'We have a strict policy against using child labor and zero tolerance to all forms of forced, bonded, or imprisoned labor in our own operations and in our supply chain. [...] Where such a potential risk is identified, it is thoroughly investigated, and a remediation plan is put in place based on SA8000 recommendations'. However, no further description of its global system to prevent, mitigate or remediate its salient human rights issues found. This subindicator looks for a system that shows how the Company takes proactive actions to tackle the human rights (including labour) risks and impacts that it considers to be salient. [2020 MSA, 2021: nokia.com] Not Met: Description of how global system applies to supply chain Not Met: Example of actions decided on at least 1 salient HR issues Score 2 <ul style="list-style-type: none"> Not Met: Meets all requirements under score 1 Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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 <ul style="list-style-type: none"> Not Met: System for tracking or monitor if actions taken are effective Not Met: Lessons learnt from checking system effectiveness: Regarding its human rights due diligence process, the Company indicates that 'Training, tracking results, communication of findings, checkpoints and triggers for the process are reviewed and where needed improved on an ongoing basis'. However, no example found of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. Moreover, current process seems to focus on the assessment of the selling of technological products to potential customers and its possible human rights impacts. [Human Rights Policy, 2022: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com] Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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 <ul style="list-style-type: none"> Met: Channel accessible to all workers: It indicates: 'Nokia provides multiple channels to raise a concern. You may talk to your line manager, Legal and Compliance, People organization, or local ombuds leaders, or raise a concern via the Ethics Helpline – which can be accessed via the EthicsPoint helpline icon on your desktop, by calling the helpline, or via the Nokia Code of Conduct mobile app. You may also write to our CEO or our Board of Directors. All concerns, irrespective of the channels used to report, are handled confidentially and thoroughly investigated'. [Code of Conduct, 2021: nokia.com] Score 2 <ul style="list-style-type: none"> Met: Channel is available in all appropriate languages and workers aware: The Ethics Helpline is available in more than twenty languages and is described in the code. The Company discloses the following: 'We require employees to acknowledge the Nokia Code of Conduct, which is cascaded to Ethical business and corporate governance our employees as part of our annual mandatory compliance training. The Code is accessible from various resources, including a company mobile app, and online versions in 23 languages'. [Ethics Point Nokia, N/A: secure.ethicspoint.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describe how workers in the supply chain have access to grievance mechanism: The document An overview of our supplier requirements indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. The Code indicates: 'The management system should contain (...) Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org] • Met: Expect Suppliers to convey expectation to their own suppliers: As it is stated above, according to the RBA Code of Conduct the management system should contain the following elements: 'Worker Feedback, Participation and Grievance: Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement'. The RBA Code also notes: '[RBA] Participants must regard the Code as a total supply chain initiative. At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code'. The Procurement Policy indicates: 'we ask our suppliers to observe (...) the RBA Code of Conduct'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company offers the same channels described in C.1 to external stakeholders. It offers 'we offer multiple channels to both our internal and external stakeholders to report potential ethical concerns or violations to the mentioned policies by providing an email address, an online tool and, also by providing dedicated country-specific phone numbers.' [Modern Slavery Statement 2019, 06/2020: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The website, also accessible to external stakeholders, is available in multiple languages. However, it is not clear how it ensures all affected external stakeholders at its own operations are aware of it. [Ethics Point Nokia, N/A: secure.ethicspoint.com] • Not Met: Communities access mechanism direct or through suppliers: Although the Company's channel is open to external stakeholders, it is not clear if suppliers' external stakeholder can file complaints against suppliers' behavior. • Not Met: Expect supplier to convey expectation to their own suppliers
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 • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, 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 and how complainants will be informed: The Code states that 'The Legal and Compliance team will review and promptly address your concern for appropriate follow-up and resolution. This may involve assigning an experienced investigator to look into the concern. The investigator may be assisted by auditors or other experts as needed to fully understand the concern. The team will track your concern from initiation to its resolution to ensure that it receives careful and thorough attention'. However, no further description found of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and informing the complainant. [Code of Conduct, 2021: nokia.com] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation: The Company states in its MSA: '[...] we maintain a zero tolerance for any retaliation related to reporting ethical concerns, we also ensure full anonymity in case this is preferred by the concerned party – it is possible to submit the report without disclosing personal details.' [Modern Slavery Statement 2019, 06/2020: nokia.com] • Met: Practical measures to prevent retaliation: The helpline allows for anonymous reporting. [Modern Slavery Statement 2019, 06/2020: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: The 2021 People & Planet Report indicates: 'We emphasize and ensure that all employees are empowered to raise concerns and speak up about potential violations of our Code of Conduct. Retaliation of any kind is not permitted, and we take seriously all allegations regarding any form of reprisal and investigate such concerns thoroughly'. Additionally, 'Global Ombuds program Our Ombuds program fosters and strengthens our speak-up culture and reinforces our policies that help to ensure that those who raise concerns are protected from retaliation. Our local Ombuds leaders actively promote the program and serve as confidential and neutral resources for employees with compliance questions, concerns, and requests for guidance. The global Ombuds network is a critical element in preventing, detecting, and addressing wrongdoing by providing a neutral, trusted resource for employees and an additional channel through which to raise concerns about business practices'. However, although the Company notes retaliation is not permitted and indicates mechanisms to ensure it, no further evidence found specifically indicating that it will not retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them as well as the through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse and engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The document An overview of our supplier requirements on Sustainability indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. The Code states: 'Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation. [...] Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation'. The document An overview of our supplier requirements on corporate responsibility indicates: 'Supplier shall have a system through which employees can give feedback or complain about unethical conduct, unfair treatment or practices, violation of company values, policies and procedures, or improvement ideas and suggestions. Management shall, when appropriate, act upon this feedback and handle it confidentially and anonymously'. However, although the Company indicates it requests suppliers to prohibit retaliation, it is not clear the prohibition also covers external individuals and communities at supply chain level, as it is not clear the channels are open to them. Although the Company has the document 'An Overview of our Supplier Requirements on Sustainability', it points out in its feedback to CHRB to the document 'An Overview of our Supplier Requirements on Corporate Responsibility'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org]
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: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	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: Describes how remedy has been provided: In relation to forced, labor, the Company describes the following: 'our audits uncovered 13 cases related to a non-compliance or potential risk of forced labor. The majority of cases concerned

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employees having to cover the cost of medical examination or transportation fees during the recruitment process. Such costs were generally reimbursed two or more months later as part of the salary. This delay provides for a potential risk of bonding. All such cases were addressed with suppliers through revision of their recruitment procedures and contracts with the manpower agencies or directly with medical institutions ensuring that the fees would not be paid by employees'. [2021 People & Planet Report, 26/03/2022: nokia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes to systems, processes and practices to stop similar impact: The 2020 MSA indicates: 'In 2020, on a global scale, concerns around mistreatment of ethnic and other minorities increased. We have conducted further risk assessment, updated and carried out a training session concentrating on modern slavery for our suppliers globally, and strengthened our Corporate Responsibility auditing guidelines to communicate our requirements concerning the treatment of ethnic or any other minorities and the appropriate actions to be taken. We also set up related key performance indicators in our existing monitoring programs such as EcoVadis, and will be reporting our annual progress against these indicators which are: actions to prevent discrimination and/or harassment; actions to remediate discrimination and/or harassment; reporting on diversity in executive positions – including minorities, vulnerable workers and women; actions to promote diversity; collective agreement on diversity, discrimination, and/or harassment; whistle-blowing procedure on labor and human rights issues'. [2020 MSA, 2021: nokia.com] • Not Met: Describe approach to monitoring implementation of agreed remedy: The 2021 Annual Report indicates: 'In 2021, the Business Integrity Group closed 261 investigations into alleged violations of our Code of Conduct, 72 of which were substantiated with cause found after investigation. We also implemented corrective actions including 13 dismissals and 15 written warnings following investigations conducted by the Business Integrity Group. Beyond individual discipline, these investigations resulted in detailed root cause analysis, and remedial measures and improvements were identified and monitored for implementation'. However, although the Company indicates figures related to the outcome of grievance investigations and that it monitors remedial measures, no description found of its approach to monitoring implementation of the agreed remedy. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Number grievances filed, addressed or resolved and outcome achieved: The 2021 People & Planet Report indicates: 'In 2021, the Business Integrity Group, our investigations team in the compliance organization, received 853 concerns, of which 361 were investigated by our Business Integrity Group as alleged violations of our Code of Conduct. In 2021, the Business Integrity Group closed 261 investigations into alleged violations of our Code of Conduct, 72 of which were substantiated with cause found after investigation. We implemented corrective actions including 13 dismissals and 15 written warnings following Business Integrity Group investigations'. It also indicates that 5 of these concerns raised were Human Rights related. However, although the Company discloses the number of Human Rights related concerns raised, it is not clear the number of grievances about human rights issues addressed or resolved and outcomes achieved for its own workers, for external individuals.. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: How lessons from mechanism improve management system: The Company provides comments for this indicator, however, no example found of how lessons from the mechanism have contributed to improving the company's human rights management system. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result: Regarding it grievance mechanisms, the 2021 People & Planet Report indicates: 'In this year's Employee Compliance and Inclusion Survey, 97% of respondents said they knew of the multiple ways to report a compliance-related concern'. However, it is not clear the process it has in place to review the effectiveness of the grievance mechanism. It also indicates some outcomes of investigations of grievances raised: 'Beyond individual discipline, these investigations resulted in detailed root cause analysis, and remedial measures and improvements were identified and monitored for implementation'. However, no example of changes made to improve the system based on the review [review the effectiveness of the grievance mechanism] found. [2021 People & Planet Report, 26/03/2022: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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: Discloses living wage requirements in supplier code or contracts: The document An overview of our supplier requirements indicates: ‘ Our Supplier Requirements form part of our contractual agreements with suppliers’. Also: ‘Supplier 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 whichever is higher’. However, it is not clear it has its living wages requirement includes covering basic needs and provide some discretionary for employees and his/her family and or depends. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] • Not Met: Improving living wage practices of suppliers: The 2020 MSA notes: ‘While we conduct assessments to ensure compliance, we realize that assessments alone are not sufficient to drive continuous improvement and competence development on sustainability. [...] In 2020 our supplier workshops were also moved fully online and we ran 25 (6 onsite in 2019) supplier training workshops on modern slavery [...]. We expect and encourage our suppliers to cascade provided training materials to their entire personnel and to the next supplier tier’. However, although the Company indicates it works with suppliers through workshops, it is not clear any of these workshops include living wages. The 2021 People & Planet Report indicates: ‘We have robust 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 and inclusion and diversity. Our work includes advocating for greater dialog on non-discrimination of ethnic and other minorities. [...] In 2021, our audits uncovered 13 cases related to a non-compliance or potential risk of forced labor’. The Company then discloses various corrective action carried out as a result, such as ‘all of the apprentices [apprentices who were being paid below minimum wage for longer than six months] were also paid at least the legal minimum wage. In all cases designated as child labor avoidance risks, the findings were addressed with corrective action plans and closed within 2021’. Although the Company discloses examples of actions taken to address non-compliances, it is not clear how it proactively works to support the payment of a living wage by its suppliers. [2020 MSA, 2021: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage: The 2021 People & Planet Report indicates: ‘In 2021, our audits uncovered 13 cases related to a non-compliance or potential risk of forced labor’. However, no assessment of the number affected by (scope of) payment below living wages in its supply chain found. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Provides 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 (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 direct and indirect suppliers back to manufacturing sites (factories or fields): It indicates: 'In 2021, we had business with around 11 000 suppliers, and 80% of our total supplier spend was distributed across around 300 suppliers. Our suppliers fall into four broad categories: hardware suppliers for product materials; services suppliers who support the provision of services to our customers such as in installation and construction of the networks we sell; IT suppliers; and indirect suppliers for everyday goods and services we need to run our business such as consulting, legal and marketing. Our manufacturing suppliers are mainly based in Asia and services suppliers are based around the world'. However, it is not clear it identifies its suppliers, including direct and indirect suppliers [Ethical Business (web), N/A: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses a list of Contract Manufacturers and strategic Original Design Manufacturers and Component Suppliers, they 'account for approximately 50% of Nokia's spend in Fiscal Year 2021 for the manufacturing and/or production of Nokia's products'. The list contains the names of suppliers. However, it is not clear the list included it indirect suppliers. Moreover, the Company is expected to also disclose the specific locations of suppliers. [2021 Nokia Supplier List, 2022: nokia.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the 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: Child Labour rules in codes or contracts: The document An overview of our supplier requirements indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. The Code indicates: 'Child labor is not to be used in any stage of manufacturing. (...) Participants shall implement an appropriate mechanism to verify the age of workers. (...) If child labor is identified, assistance/remediation is provided'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on child labour: The 2021 People & Planet Report indicates: 'In 2021, our audits uncovered 13 cases related to a non-compliance or potential risk of forced labor. [...] We also uncovered four instances of nonconformity related to child labor avoidance in 2021. Cases included missing personal files or identity cards that meant the auditor could not immediately verify workers' ages. The suppliers provided evidence that all workers in question were above the minimum age. They also fixed the process and corrected the missing documentation issue. In another case, there were no procedures in place to assist underage children if found working for the supplier in question who did otherwise have a policy and process established to ensure that workers below the legal minimum working age are not hired either directly or indirectly via labor contractors. As a corrective action, the supplier established a procedure to provide for the welfare of any underage children discovered in their employ'. However, although the Company discloses corrective action to address child labor nonconformities, no description found of how it proactively works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [2021 People & Planet Report, 26/03/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assessment of number affected by child labour in supply chain: The Company discloses its 'Findings from our in-depth corporate responsibility supplier audits' for 'Number of potential risk areas identified' of child labor: 0. The results is based on '64 Corporate responsibility in-depth supplier audits conducted in 2021'. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Analysis of trends in progress made
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the 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: Debt and fees rules in codes or contracts: The document An overview of our supplier requirements indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. The Code indicates: 'Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Analysis of trends in progress made
D.4.5.d	Prohibition of forced labour: Wage practices (in the 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: Requirement for suppliers to pay workers in full and on time in codes or contracts: The document An overview of our supplier requirements indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. The Code indicates: 'For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed[...] Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. (...) Deductions from wages as a disciplinary measure shall not be permitted'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the 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: Free movement rules in codes or contracts: The document An overview of our supplier requirements indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. The Code indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. (...) All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on free movement: The Company indicates: 'Following growing concerns around mistreatment of ethnic and other minorities globally, we have conducted refresher training sessions regarding modern slavery, and inclusion and diversity for our suppliers located in high-risk countries, conducted further risk assessments, and carried out a supplier survey around inclusion and diversity. All together we ran 21 supplier training workshops on (...) modern slavery (...)'. However, it is not clear how it works specifically with suppliers to eliminate retention of worker's documents or other actions to physically restrict movement. [2021 People & Planet Report, 26/03/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of association and collective bargaining (in the 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: FoA & CB rules in codes or contracts: The document An overview of our supplier requirements indicates: 'Our Supplier Requirements form part of our contractual agreements with suppliers'. The Code indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment'. However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. The 2020 MSA notes: 'We respect the right to collective bargaining and freedom of association. Collective bargaining agreements are local, and in most countries where we have collective bargaining agreements, employees who have chosen not to be members of a union are also covered. Employees can choose freely to join, not join, or leave unions and associations and select their representatives based on local and international practices. We encourage active, open communication and dialogue with employees and/or their representatives'. However, as indicated, it is not clear whether, in locations where local law doesn't allow these rights, the Company facilitate alternative mechanisms (not breaking the law). [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on FoA and CB: The Company indicates the actions taken by supplier in order to address the issue of 'Workers' union had not been formed': 'The workers' union has been established in the supplier factory and the staff of the factory uniformly uses the trade union'. It is not clear, however, the specific, proactive work the Company conducts with suppliers to support their practices in relation to freedom of association and collective bargaining. Current evidence seems a response to non-compliances. [2021 People & Planet Report, 26/03/2022: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Assessment of the number affected by restrictions to FoA and CB in the SP: The Company discloses its 'Findings from our in-depth corporate responsibility supplier audits' for 'Number of potential risk areas identified' of Freedom of association and right to collective bargaining: 1. The results is based on '64 Corporate responsibility in-depth supplier audits conducted in 2021'. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Provides analysis of trends demonstrating progress: Moreover, there were 5 instances of non-compliances. However, no evidence found on year-on-year data or trend explanation.
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the 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: Sets out clear Health and Safety requirements: The document An overview of our supplier requirements indicates: 'Our Supplier Requirements form part of our contractual agreements with suppliers'. The Code health and safety standards include: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period: The Company provides the figures for fatal incidents, however, this seems to be related to its own operations. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: Regarding building supplier capacity, the Company indicates that in 2021: 'All together we ran 21 supplier training workshops on (...) health and safety'. However, no further description found. [2021 People & Planet Report, 26/03/2022: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Assessment of the number affected by H&S issues in the SP: The 2021 People & Planet Report indicates: 'By the end of 2021, 99% of suppliers delivering high-risk activity had been assessed using our H&S Maturity Assessment Process and 98% of the assessed suppliers met H&S compliant supplier status (score 3 or more out of 5), and 23% of the suppliers met H&S preferred supplier status (score 4 or more out of 5). We also carried out implementation assessments on 100% of all high risk projects. 98% of those projects were found to meet our minimum non-negotiable requirements'. The Company discloses its 'Findings from our in-depth corporate responsibility supplier audits' for 'Number of potential risk areas identified' of Health and safety: 21. [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Provide analysis of trends in progress made: The Company indicates: 'Our framework was audited in numerous locations and certified by third party Bureau Veritas. Having had H&S global management system, audits, certifications in place and demonstrating continuous improvement year over year, this positions us as an effective leader in global H&S management systems and programs worldwide. [...] Our assurance and governance programs have built in checkpoints to measure effectiveness. We have agreed metrics and key performance indicators designed into all levels of our programs and business processes to assure and manage risk in critical areas such as supplier qualification and project management where high-risk activities are delivered. Market operational reviews and internal and external audits provide the visibility and accountability needed to improve performance and reduce risk. In addition, regular reporting, communication of recovery plans and action management are in place to ensure effective program management. We see the highest risk in the health and safety of our contractors who, for example, work at height, drive, or work with electricity. Thereby, we have set stringent key performance indicators related specifically to supplier Health and Safety Maturity Assessment (SMA) qualification and High-Risk Project Assessment (HRPIA) to ensure contractors are capable of delivering work safety on our behalf and projects have risk procedures and controls in place'. However, no analysis of trends demonstrating progress found in relation to its supply chain. It also reports that the instances of non-compliances were: 86. The results is based on '64 Corporate responsibility in-depth supplier audits conducted in 2021'. However, it is not clear the trend year-on-year showing evolution in relation to health and safety in the supply chain. [2021 People & Planet Report, 26/03/2022: nokia.com]
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The document An overview of our supplier requirements indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. The RBA Code indicates: 'Reasonable steps must also be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers'. The Code of Conduct indicates: 'Nokia provides equal opportunities to all employees in every aspect of employment, including recruitment, hiring, compensation, job assignment, promotion, and termination. [...] We also expect the same of our contractors and suppliers'. The Third Party Code of Conduct notes: 'Practice fair treatment of others. Do not engage in or support discrimination based on [...] gender[...] or other distinguishing characteristics'. However, no evidence found of an explicit requirement to provide equal pay for equal work and to introduce measures to ensure equal opportunities throughout all levels of employment in its contractual arrangements with suppliers or supplier code of conduct. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on women's rights: The Company indicates, in its 2021 People & Planet Report: 'we have conducted refresher training sessions regarding (...) inclusion and diversity for our suppliers located in high-risk countries, conducted further risk assessments, and carried out a supplier survey around inclusion and diversity. All together we ran 21 supplier training workshops on diversity and Inclusion (...)'. The 2020 MSA notes that 'We also set up related key performance indicators in our existing monitoring programs such as EcoVadis, and will be reporting our annual progress against these indicators, which are: [...] reporting on diversity in executive positions - including minorities, vulnerable workers and women'. However, although it has programmes to address inclusion issues and it has women related indicators to measure performance, no description found of how it proactively works with suppliers specifically to improve their practices in relation to women's rights (equal pay for equal work, equal opportunities through all levels of employment, or health and safety issues in relation to women).. [2021 People & Planet Report, 26/03/2022: nokia.com] & [2020 MSA, 2021: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions: The Company discloses its ' Findings from our in-depth corporate responsibility supplier audits' for 'Number of potential risk areas identified' of Discrimination: 0. Also, the instance of non-compliances were 4. The results are based on '64 Corporate responsibility in-depth supplier audits conducted in 2021'. However, it is not clear whether these includes women generally and in particular their rights (i.e equal pay for equal work, equal opportunities throughout all levels, health and safety concerns, etc.) [2021 People & Planet Report, 26/03/2022: nokia.com] • Not Met: Provide analysis of trends in progress made: See above. However, it is not clear the number affected by (scope of) discrimination or unsafe working conditions for women in its entire supply chain.
D.4.9.b	Working hours (in the 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: Working hours in codes or contracts: The RBA Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. (...) Workers shall be allowed at least one day off every seven days'. The document An overview of our supplier requirements indicates: 'Supplier shall be in compliance with the latest version of RBA Code of Conduct Requirements'. It also notes: 'In addition to RBA code requirement on working hours, overtime work if any shall be voluntary and shall not be required on a regular basis. Employees shall be entitled to minimum 14 days of paid annual leave (in addition to festival holidays) per year unless local law sets higher requirement'. However, requirement to respect applicable international standards concerning maximum hours and minimum breaks and rest periods found. The document An overview of our supplier requirements on corporate responsibility indicates: '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'. Although the Company has the document 'An Overview of our Supplier Requirements on Sustainability', in its feedback to CHRB, the Company points out to the document 'An Overview of our Supplier Requirements on Corporate Responsibility'. [An overview of our supplier requirements on Sustainability, N/A: nokia.com] & [RBA Code v.7, 2021: responsiblebusiness.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on working hours: The 2021 People & Planet Report provides an example of action taken to address a non-compliance identified related to working hours: 'Workers did not receive at least one day off every seven days. The longest consecutive working days were nine days worked in a row'. The corrective action taken by the supplier was: 'Excessive working hours have been partially caused by COVID-19. The supplier has documented a plan to recover from the situation and put in place a new on call duty system to bring back weekly rest period, achieving conformance with Responsible Business Alliance's instruction related to working hours limitations during COVID-19 pandemic from March 2020'. The 2020 MSA also indicates that working hours is monthly monitored on its core labor KPIs. However, it is not clear how it proactively works with suppliers to improve their practices in relation to working hours. [2020 MSA, 2021: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com] Score 2 • Met: Assessment of number affected by excessive working hours: The Company discloses its 'Findings from our in-depth corporate responsibility supplier audits' for 'Number of potential risk areas identified' of Working hours: 53. Also, the instance of non-compliances were 51. The results are based on '64 Corporate responsibility in-depth supplier audits conducted in 2021 [People and Planet Report (Sustainability Report 2019), 03/2020: nokia.com] • Not Met: Provide analysis of trends in progress made: See above. However, no evidence found of figures or explanation year-on-year showing evolution.
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates that it incorporates 'the principles of this [Responsible Minerals] policy into our contractually binding Supplier Requirements and will conduct due diligence consistent with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We expect our suppliers to establish and maintain a publicly available policy in responsible mineral sourcing and conduct the due diligence to their own supply chain consistent with OECD Guidance'. [Responsible Minerals Policy, 02/09/2019: nokia.com] • Not Met: Works with smelters/refiners and suppliers to build capacity: The 2020 Conflict Minerals Report notes: 'Nokia has also conducted several dedicated information sharing live webinar sessions as well as onsite workshop with suppliers to further explain our conflict minerals requirements and risk mitigation'. The Company also indicates OECD Due Diligence Guidance: 'Strengthen company engagement with suppliers. A conflict minerals policy should be incorporated into contracts and/or agreements with suppliers. Where possible, assist suppliers in building capacities with a view to improving due diligence performance'. Finally, it explains: '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, and we encourage our suppliers to participate in industry activities in order to learn and contribute'. Regarding capacity building among supplier, the 2021 Sustainability Report notes: All together we ran 21 supplier training workshops on (...) responsible minerals sourcing (...). The Responsible Minerals Policy states: 'We continue to create more awareness and build capacity within our supplier base through training and regular feedback to suppliers'. However, although the Company indicates it carries out work with suppliers, the indicator also looks for specific work done with smelters/refiners. No further description found on how it works with smelters/refiners to contribute to building their capacity in risk assessment and improving their due diligence performance (including through industry-wide initiatives). [2020 Conflict Minerals Report, 24/05/2021: nokia.com] & [2021 People & Planet Report, 26/03/2022: nokia.com] Score 2 • Not Met: Contractual requirement to disclosure smelter/refiner information: The Responsible Minerals Policy indicates: 'We incorporate the principles of this policy into our contractually binding Supplier Requirements [...]. Additionally, we require our suppliers to report on their due diligence regarding sourcing of tin, tantalum, tungsten, gold and cobalt and maintain the respective data for 5 years'. However, although the Company indicates it contractually requires suppliers to report on their due diligence regarding sourcing of tin, tantalum, tungsten, gold and cobalt, it is not clear it requires suppliers to disclose to the Company (as necessary on a confidential basis) updated smelter/refiner information for any 3TG mineral used in the production of its parts, materials, components and products. [Responsible Minerals Policy, 02/09/2019: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	<ul style="list-style-type: none"> • Not Met: Contractual requirement covers all minerals <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The 2020 Conflict Minerals Report indicates: 'in order to conduct its reasonable country of origin inquiry, Nokia uses a combination of actions [...]With direct suppliers, the primary means for conducting the reasonable country of origin inquiry survey [...], with the aim of assessing the direct suppliers' due diligence activities and identifying processing facilities and countries of mineral origin. [...] 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. Reminders are sent to non-responsive suppliers and an escalation process is enacted when there is slow progress on supplier side on improvements and meeting Nokia targets. Responsible minerals conformance status is also integrated into Supplier Performance Evaluation. Nokia continues the risk assessment by comparing smelter data provided by suppliers to information provided by the RMAP and online research [...]. In addition, broader social, environmental and human rights risks related to upstream sourcing are addressed via RMI's Risk Readiness Assessment'. The Responsible Minerals Policy indicates: 'We incorporate the principles of this policy into our contractually binding Supplier Requirements and will conduct due diligence consistent with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We expect our suppliers to establish and maintain a publicly available policy in responsible mineral sourcing and conduct the due diligence to their own supply chain consistent with OECD Guidance'. The 2021 People & Planet Report notes 'In 2021, 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 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals. In 2021, 99% of our suppliers had achieved full visibility into the 3TG (tungsten, tin, tantalum and gold) smelters in our supply chain, and for 97% of our suppliers the entire supply chain consisted of smelters which have been validated as conflict-free, were active in the validation process or defined as low risk. Out of all the smelters and refiners identified as part of our supply chain, 78% have been validated as conflict-free or are active in the validation process under the Responsible Minerals Assurance Process. A further 8% of smelters can be reasonably considered as conflict-free based on our due diligence efforts'. However, although the Company makes a comprehensive description of risk identification process and indicates that the supply chain visibility and that the majority of its suppliers were conflict-free, no disclosure of the risks identified in process found (indication of which are the risks it faces). [2020 Conflict Minerals Report, 24/05/2021: nokia.com] & [Responsible Minerals Policy, 02/09/2019: nokia.com] • Met: Identification of smelter/refiners and OECD Guidance: 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 and LBMA.' The Company identified that 23 out of 1264 total suppliers are not conflict-free for all minerals. [Conflict Minerals Report 2019, 28/05/2020: nokia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses smelters/refiners judged in line with OECD Guidance: The Conflict Minerals report includes lists of smelters/refiners judged by the RMPA and LBMA. These lists include smelters found to be conformant, participant, and non-participant. [Conflict Minerals Report 2019, 28/05/2020: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Risk identification and disclosure covers all minerals: See above the Company's risk identification process. In addition, the 2021 People & Planet Report indicates: We also undertook a mapping of cobalt and mica in our components based on material declarations for product parts. We addressed 65 relevant suppliers about our requirements regarding cobalt and engaged them to exercising due diligence over the cobalt supply chain and 8 suppliers with mica. As a result we have been able to identify 63 cobalt smelters in our cobalt supply chain, out of which 38 have gone through the Responsible Minerals Assurance Program and have either Conformant or Active status. In 2021, we undertook an assessment of our entire list of materials against ESG risks and updated our responsible minerals long-term target'. However, it is not clear that the Company conducts risk identification processes for all minerals. [2021 People & Planet Report, 26/03/2022: nokia.com] & [2020 SEC Conflict minerals report, 2021: nokia.gcs-web.com]
D.4.10.c	Reporting on responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows: 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'. [Conflict Minerals Report 2019, 28/05/2020: nokia.com] • 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.' [Conflict Minerals Report 2019, 28/05/2020: nokia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Disclose better risk prevention/mitigation over time: The 2020 Conflict Minerals Report indicates part of the OECD Due Diligence Guidance: 'Implement the risk management plan, monitor and track performance of risk mitigation efforts and report back to designated senior management. This may be done in cooperation and/or consultation with local and central government authorities, upstream companies, international or civil society organizations and affected third-parties where the risk management plan is implemented and monitored in conflict-affected and high-risk areas'. And: 'Undertake additional fact and risk assessments for risks requiring mitigation, or after a change of circumstances'. The Company then discloses its commitments for 2021: 'In order to mitigate the risk that the conflict minerals contained in, and necessary to the functionality or production of, Nokia's products benefit armed groups, and to improve our conflict minerals due diligence efforts further in the coming year, we plan to concentrate on the following activities in 2021: engaging in further awareness raising and due diligence capability building efforts jointly in collaboration with relevant stakeholder forums and/or independently with our suppliers; requesting non-conformant suppliers to improve quality of the reporting and to finalize the phase out of the non-conformant smelters; actively engaging with our supply chain to get more smelters validated as conflict-free through the third-party validation mechanisms, with the aim of sourcing only from the list of RMAP compliant smelters'. However, although the Company indicates its goals for the year 2021, it is not clear that there has been significant improvement in risk prevention/mitigation over time with respect to at least 3TG. No further evidence found. [2020 SEC Conflict minerals report, 2021: nokia.gcs-web.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy: The 2020 Conflict Minerals Report indicates: 'we plan to concentrate on the following activities in 2021: engaging in further awareness raising and due diligence capability building efforts jointly in collaboration with relevant stakeholder forums and/or independently with our suppliers'. Additionally, 'Nokia Responsible Minerals Policy (formerly Nokia Conflict Minerals Policy) has been communicated to suppliers when first released and thereafter in conjunction with the annual supply chain responsible minerals sourcing inquiry and related webinars. [...] Nokia has also conducted several dedicated information sharing live webinar sessions as well as onsite workshop with suppliers to further explain our responsible minerals requirements and risk mitigation'. The Company also discloses part of the OECD Due Diligence Guidance: 'Implement the risk management plan, monitor and track performance of risk mitigation efforts and report back to designated senior management. This may be done in cooperation and/or consultation with local and central government authorities, upstream companies, international or civil society'. However, although the Company discloses various instances of engagement with different groups or plans of future engagements, it is not clear how it engages with suppliers and affected stakeholders to agree on its strategy for risk management. [2020 Conflict Minerals Report, 24/05/2021: nokia.com] • Not Met: Risk management and response processes cover 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		<ul style="list-style-type: none"> Area: Right to security of persons Headline: Apple and others named as supplier North Mara Gold Mine faces allegations of pollution and violence in Tanzania Story: On June 18th, 2019, news outlets in several countries simultaneously released the results of investigations by a consortium of journalists, Forbidden Stories, into human rights and environmental abuses at Barrick Gold's North Mara gold mine in Tanzania, confirming six years of investigations, reported on yearly by MiningWatch Canada, into assaults on men, women and children by the mines private security and by police contracted by the mine. There have been injury cases including loss of limbs, loss of eyesight, broken bones, and internal injuries. Additionally, the consortium highlighted attacks on journalists who have tried to report on human rights abuses at the mine. At least a dozen local and foreign reporters were censored or threatened, and this is why Forbidden Stories has decided to investigate Acacia Mining's activity in the mine. The consortium also exposed how the gold from this mine is refined in India and Switzerland before being sold to, among others, international electronic companies. In June 2019, at the annual shareholders meeting, human rights campaigners called for independent and transparent assessment of grievance claims and an end to the memorandum of understanding with police. [The Guardian, 18/06/2019, "Murder, rape and claims of contamination at a Tanzanian goldmine": theguardian.com] [Ghana Business News, 19/06/2019, "Green Blood: A Tanzanian gold mine that silences journalists": ghanabusinessnews.com] [The Guardian, 18/06/2019, "Tech firms to check suppliers after mining revelations in Tanzania": theguardian.com]
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Met: Public response: According to the Guardian, "Nokia said it would contact the refinery and industry regulators. Based on allegations we have also directly reached out to MMTC-PAMP and are awaiting a response. We will follow up on information received, to determine further action, and if allegations are confirmed, this smelter will be red-flagged and we will ask our supply chain to divert business from this smelter." [The Guardian, 18/06/2019, "Tech firms to check suppliers after mining revelations in Tanzania": theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Detailed response: The response does not address the different aspects of the allegation or acknowledge that there are various incidents mentioned in the allegation. Instead the response remains general. [The Guardian, 18/06/2019: theguardian.com]
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Not Met: Engaged with stakeholders: Following the publication of the allegation, Apple, Nokia and Canon said they would ask MMTC-PAMP to look into the claims, and the refinery announced it would assess its gold supply chain from Tanzania and arrange for a site visit by an independent expert, Synergy Global Consulting Ltd. <p>The visit took place on 19-21 November 2019, however, the visitors were allowed to talk only to local residents vetted by the mine. Furthermore, "the mine said there was a security issue offsite so we suggested some victims go to mine office and speak to the assessor there. Then they said there was not enough time in the schedule. So the assessor spoke to none of the human rights victims, [or] lawyers of victims"</p> <p>According to the auditor, they had "spoken to a variety of stakeholders, including local community representatives. Following the trip [...] there was also an interview with an international NGO." In a response to RAID the auditor admitted that there had been no engagement with affected stakeholders.</p> <p>Barrick Gold, the company operating the mine, claims it has been conducting stakeholder and community engagement since taking over the operations. However, this claim does not expressly include the engagement with affected stakeholders. [The Guardian, 13/07/2020, "Gold trade body urged to suspend refinery over alleged abuses in Tanzania": theguardian.com] [Synergy, 10/07/2020, "Response to RAID article "LBMA Should Suspend Gold Refiner</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>MMTC-PAMP""": media.business-humanrights.org] [Barrick, 10/08/2020, "Solid Operating Performance Maintains Production Within Guidance": barrick.com] [Barrick, N/A, "Human Rights Report": s25.g4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The executive summary of the auditor's report included no evaluation of historical claims. Instead the summary said the focus of the assessment was to look forwards rather than backwards because a new management team had been put in place at the mine. Therefore, the summary does not identify the underlying causes of the impacts. Even though the auditor told The Guardian that the full report "would include a review of historical allegations against the mine based largely on third-party information, such as newspaper articles and evidence collected by civil society groups and lawyers" the CHRB could not access the full report to verify these claims. <p>Barrick Gold also states that the violations took place under the management of the previous operator and does not present an analysis of underlying causes. [The Guardian 13/07/2020: theguardian.com] [Synergy, 05/2020, "MMTC-PAMP North Mara Gold Mine Assessment - Executive Summary": mmtcpamp.com] [Barrick, 10/08/2020: barrick.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy [Raid, 07/2020, "Analysis of synergy assessment north mara gold mine update": raid-uk.org] [Raid, 16/12/2021; "Will Barrick Gold's CEO go beyond rhetoric to deliver justice for victims of police killings at Tanzania mine?": raid-uk.org] [Responsible Mining Fpundation, 14/08/2020, "More Tnaznian human rights victims join UK legal action against Barrick": responsibleminingfoundation.org] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Forced labour <ul style="list-style-type: none"> • Headline: Nokia among companies accused of using suppliers linked to forced labour in China <ul style="list-style-type: none"> • Story: On March 1st, 2020, the Australian Strategic Policy Institute (ASPI) released a report called "Uyghurs for sale" that named Nokia among 83 other companies benefiting from the use of potentially abuse labour transfer programmes. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China, have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country. The ASPI report alleged that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. <p>The ASPI used open-source public documents, satellite imagery, and media reports, the institute identified 27 factories in nine Chinese provinces that have used labourers. The research found that workers were transferred to work several factories including Foxconn. Foxconn's website says their brands and 'marketing channels' include Nokia and Sharp.</p> <p>ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". The report calls on companies mentioned to "conduct immediate and thorough human rights due diligence on its factory labour in China, including robust and independent social audits and inspections."</p> <p>[ABC, 01/03/2020, "Apple, Nike and other major companies implicated in Muslim forced labour in China": abc.net.au] [Australian Strategic Policy Institute,</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			01/03/2020, "Uyghurs for sale": aspi.org.au [The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": theguardian.com] [Financial Times, 01/03/2020, "Xinjiang forced labour reported in multinational supply chains": ft.com]
E(2).1	The Company has responded publicly to the allegation	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: Public response: On May 7, 2021, Nokia responded to the letter of the Working Group on Business and Human Rights on the allegation of forced Uyghur labour in its supply chain (OTH 140/2021), stating that: "An ethical supply chain is a matter we take very seriously. We do not tolerate slavery, servitude, trafficking in persons, and forced or compulsory labor of any kind either in our own operations or in our supply chain. We have supplier assessment and tracking processes and procedures and conduct due diligence supplier audits and assessments on an ongoing basis, including in-depth onsite audits. Forced labour, discrimination and disciplinary practices are standard components of our due diligence activities. Nokia is aware of a report by the Australian Strategic Policy Institute (ASPI), which appears to be the source of the allegations. In response to the allegations, we conducted further assessments of the relevant suppliers and confirmed that none of our manufacturing suppliers are based in or near the Xinjiang Autonomous Region. Further, we have found no evidence to substantiate the claims in relation to Nokia. [...] In 2020, we conducted 27 audits against our full set of supplier requirements and 24 in-depth CR audits. In 2020, audits were carried out in China, Mexico and Morocco and reached a total of around 30,050 supplier employees. All nonconformities were analyzed by the Nokia Sustainable Procurement Team. None were related to the allegations in this letter." [Nokia response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 140/2021), 07/05/2021: spcommreports.ohchr.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company response outlines policies and steps taken after the allegation emerged. However, the engagement with the actual content of the allegation (the forced labour practices, labour transfers, etc.) was addressed only in very general terms.
E(2).2	The Company has appropriate policies in place	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: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: In its response to the UN Working Group on Business and Human Rights' Letter, the company declared that, after the allegations, "We conducted further risk assessment across our operations and supply chain, updated and carried out a training session concentrating on modern slavery for our suppliers globally, and strengthened our Corporate Responsibility auditing guidelines to communicate our requirements concerning the treatment of ethnic or other minorities and for appropriate actions to be taken. We also set up additional related key performance indicators in our existing monitoring programs such as EcoVadis". Thereby, the company implemented some changes to its policies following the events and their human rights impacts. [Nokia response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 140/2021), 07/05/2021: spcommreports.ohchr.org] • Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies.
E(2).3	The Company has taken appropriate action	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: Provided remedy • Not Met: Evidence for lack of Impact or link: The company declared: "In response to the allegations, we conducted further assessments of the relevant suppliers and confirmed that none of our manufacturing suppliers are based in or near the Xinjiang Autonomous Region. Further, we have found no evidence to substantiate the claims in relation to Nokia. [...] Nokia has not caused or contributed to adverse impact on the human rights of Uyghur and other minority workers". However, the company did not provide sufficient evidence to prove it is not linked to the impact. [Nokia response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 140/2021), 07/05/2021: spcommreports.ohchr.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Independent remedy process used: The company disputes the allegations. There is no evidence that the company participated in an independent process to reach its conclusion.

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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