



Nokia Solutions and Networks GmbH & Co KG

Declaration of principle

Table of contents

1. Commitment to respecting human rights and environmental obligations	2
2. Human rights-related expectations towards our employees and suppliers	3
2.1 Commitment to respect for human rights	3
2.2 Implementation in own business area	3
2.3 Human rights in the supply chain.....	4
2.4 Environmental expectations.....	5
3. Procedure for implementing the due diligence obligations of the LkSG	5
3.1 Risk management and risk analysis	6
3.2 Preventive measures	6
3.3 Remedial measures.....	7
3.4 Complaints procedure	8
3.5 Reporting obligations	8

For the sake of linguistic simplification, this document refers to persons of all genders when referring to persons or groups of persons.

Version 1.0 | Status: January 2025



1. Commitment to respecting human rights and environmental obligations

Foreword

Nokia Solutions and Networks GmbH & Co KG (hereinafter referred to as "Nokia Deutschland" or "Nokia Germany") is a group company of Nokia Oyj, headquartered in Espoo, Finland (hereinafter referred to as "Nokia"). Nokia is aware of its responsibility for sustainable social and ecological development. Nokia has anchored this in its Code of Conduct (*available at: [Code of Conduct](#)*) (hereinafter also referred to as "Code of Conduct") and relevant Group policies. The entire Group, including Nokia Germany, has set itself the goal of respecting and protecting human rights and the environment along our company's value chain, identifying human rights and environmental risks, remedying identified grievances and reducing risks preventively.

Since January 1, 2024, Nokia Germany has been subject to the requirements of the German Supply Chain Due Diligence Act (hereinafter "LkSG") in the implementation of its human rights and environmental due diligence obligations. Section 6 (2) of the LkSG requires, among other things, the publication of a declaration of principles that sets out the company's strategy with regard to human rights protection and the fulfillment of its environmental obligations. Key elements of this policy statement include a description of the processes that Nokia Germany uses to fulfill its legal obligations, a description of the human rights and environmental risks identified in the annual risk analysis and the expectations of employees and suppliers.

In implementing and managing the requirements of the LkSG, Nokia Germany's management utilizes Nokia's company-wide compliance management system (in particular in connection with the provision of complaint channels or risk analysis in accordance with the requirements of the LkSG) and draws on Nokia's group-wide policies on respect for human rights and environmental protection. Where reference is made in this Policy Statement to Nokia's policies and procedures, this reference therefore always includes Nokia Germany. The same applies if the policy statement only refers to the "Group".



2. Human rights-related expectations towards our employees and suppliers

2.1 Commitment to respect for human rights

Nokia, and therefore Nokia Germany, is committed to respecting and promoting human rights along the entire value chain and is guided by international standards to ensure that human rights are not restricted but fully respected and promoted in our business activities. Our understanding is based in particular on the International Bill of Human Rights, the core labor standards of the International Labor Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights, to which we are committed.

These principles and values are firmly anchored in Nokia's Code of Conduct, which all employees must follow, and are reflected in the Group's commitment to the principles of the UN Global Compact and Nokia's participation in the Global Networking Initiative.

Nokia expects and actively encourages its suppliers and business partners to respect human rights. Nokia is committed to providing access to remedy for those affected by human rights abuses.

2.2 Implementation in own business area

Overview

Nokia is committed to the principles of the Universal Declaration of Human Rights and the United Nations Global Compact. This applies in particular to all Nokia employees and is set out in the Code of Conduct, which applies to all Group companies. Employees receive regular training on the content of the Code of Conduct.

Nokia's due diligence processes focus in particular on the aspects set out below, which we have identified as potentially posing a particular risk.

Nokia condemns and prohibits in particular

- any form of child and forced labor,
- all forms of slavery and (modern) human trafficking, and
- any form of discrimination.



Nokia also recognizes and commits to its employees in particular to

- compliance with the occupational health and safety regulations applicable at the respective place of employment
- the payment of appropriate wages
- the protection of employees' freedom of association.

Nokia encourages active, open communication and dialog with employees and/or employee representatives. Nokia Germany employees are therefore free to join, leave or not join trade unions and associations of their choice and to select their employee representative in accordance with local regulations.

Nokia is also committed to equal opportunity in all its employment practices. Therefore, no person employed or applying for employment will be discriminated against on the basis of race, religion, belief, color, nationality, ethnic origin, age, gender, sexual orientation, gender identity, characteristics or expression, marital status, association with a national minority, disability, membership or non-membership of a trade union or any other protected group.

In addition, health and safety management is integrated into Nokia's business operations and into the development, production, sales and service of our products and systems. Nokia is continuously improving its health and safety standards through robust and transparent risk management, e.g. to prevent workplace accidents.

Process description

In addition to the Code of Conduct, Nokia has employee policies and procedures to ensure that its operations are fully compliant with international human rights standards and applicable law. When monitoring, Nokia Germany aims to integrate the human rights and environmental due diligence requirements of the LkSG into Nokia's existing management systems where possible. Nokia Germany also uses the company-wide Nokia Compliance Management System to provide, among other things, protected grievance channels and to handle incoming complaints as well as for comprehensive risk analysis in accordance with the requirements of the LkSG. Nokia is continuously developing its processes.

2.3 Human rights in the supply chain

Nokia recognizes that there are human rights risks along its value chain. The Group has clear criteria, standards and processes in place that require our direct suppliers to fully respect human rights. The principles outlined in this policy statement also apply to Nokia Germany's indirect suppliers in the supply chain and business partners.

Nokia wants to ensure that materials used in our products come from socially responsible sources. We will not tolerate, support or encourage activities that fuel conflict or violate human



rights. Nokia will not, under any circumstances, tolerate in any part of our global supply chain the use of

- Servitude
- Child labor
- Forced labor
- Human trafficking or
- Slavery

In order to communicate our expectations of our suppliers and business partners transparently, we have developed a Code of Conduct for Third Party Suppliers, which forms part of all supplier contracts. In it, we expect our direct suppliers to also commit to respect human rights and environmental protection and to establish appropriate due diligence processes and to communicate these principles to their own suppliers and other third parties in order to address and prevent both the risks and violations discovered by Nokia in the risk analysis and to discover further potential risks. This Code of Conduct is available at the following link: [Third-Party Code of Conduct](#).

2.4 Environmental expectations

Nokia takes a proactive approach to environmental issues. Sound environmental management is central to our business, important to our customers and stakeholders and critical to securing our future. Nokia is constantly striving to prevent pollution and reduce the environmental impact of its products and services throughout their life cycle. Fulfilling this commitment is a primary management objective of the Group and the individual and collective responsibility of all employees.

In particular, Nokia integrates environmental considerations into relevant business planning, decision-making, implementation and follow-up activities. Nokia is also committed to complying with all applicable legal environmental requirements and to implementing management systems that improve our environmental performance.

Nokia commits its direct suppliers comprehensively to protecting the environment with the Code of Conduct for Third Party Suppliers. In particular, they must act in accordance with the applicable legal provisions and international environmental protection standards.

3. Procedure for implementing the due diligence obligations of the LkSG

In order to comply with our due diligence obligations under the LKSG, we have established the following processes in our own business area and, where necessary, with our direct and indirect suppliers.



3.1 Risk management and risk analysis

We have implemented a risk management system based on the LkSG. It takes into account the special features of the telecommunications sector and is anchored in all relevant business processes. Nokia Germany's Human Rights Officer, who reports directly to the management, coordinates and monitors risk management. As part of risk management, we carry out annual and (additionally) ad hoc risk analyses to identify human rights and environmental risks along our supply chain and in our own business areas. In particular, as part of the risk analysis for the individual prohibitions, we determine whether human rights or environmental legal interests are being violated or whether there is a risk of such a violation in the business operations of Nokia Germany or in the context of business activities of direct - or, if there is substantiated knowledge, also indirect - suppliers of Nokia Germany. Our focus is on those risks that are widespread based on our experience in the telecommunications sector. For abstract and concrete risk identification, we strive for the most transparent and comprehensive overview possible of our supply chains and a continuous increase in transparency. Where necessary, we will weight and prioritize any risks in accordance with the requirements of the LkSG. Where necessary, we will examine prioritized risks in greater depth.

Our risk analysis for Nokia Germany is based on information provided by Nokia's corporate headquarters. This was determined by specially trained employees. Nokia also uses a third-party software platform to help Nokia Germany implement compliance measures in accordance with the LkSG. As part of the specific risk analysis, we also take into account any findings on the effectiveness of preventive measures, violations, the success of remedial measures and from the complaints procedure. This applies in particular to any findings on the likelihood of risks occurring and the severity of the risks.

The risk analysis is carried out at least once a year and (additionally) on an ad hoc basis by the Human Rights Officer of Nokia Germany, who reports directly to the management. Ad hoc risk analyses are carried out in particular following a change in business activities. After completion of the respective risk analysis, the Human Rights Officer will pass on the respective results to the management of Nokia Germany.

The risk analysis that Nokia Germany carried out for the first time for the 2024 financial year in accordance with Section 1 (1) LkSG did not reveal any evidence that the company has violated any of the prohibitions of the LkSG.

We take the results of the risk analysis into account in our corporate decision-making processes and use them to create and, where necessary, adapt internal regulations, processes and training.

3.2 Preventive measures

To avoid human rights or environmental risks, we have established appropriate preventive measures in our own business area and in the procurement guidelines. Currently, the preventive



measures at Nokia Germany include, in particular, supplier selection and supplier monitoring, the creation and maintenance of (Group) guidelines in the areas of human resources, environment and health and safety, employee training, procurement strategy/purchasing regulations and sustainable contract design, which also provide for audit rights vis-à-vis our direct suppliers.

In connection with the preventive measures, we ensure that the measures are suitable for preventing human rights and environmental risks. We also ensure that, in the event of a violation, they are suitable for minimizing the impact.

If a risk is identified in connection with our direct suppliers, we will immediately take appropriate preventive measures and monitor their implementation. We respond in a risk-appropriate manner by adjusting procurement measures, providing training or establishing further contractual control mechanisms.

We will also take appropriate preventative measures and support our indirect suppliers in complying with their human rights or environmental obligations if we have substantiated knowledge of factual indications that a breach of duty by an indirect supplier is possible. We respond in a risk-appropriate manner by carrying out control measures or implementing industry-specific or cross-industry initiatives.

Based on the risk analysis carried out for 2024, we are convinced that the preventive measures already implemented in our company and vis-à-vis suppliers are sufficient and effective to counteract the actual risks within the meaning of the LkSG. We review the effectiveness of the prevention measures at least once a year and on an ad hoc basis, continuously develop them and adapt them to changing conditions. This also includes a review and any updates to this policy statement.

3.3 Remedial measures

If, as part of our risk analysis, we determine that a violation of a human rights-related or environmental obligation has already occurred or is imminent, we take immediate remedial action to prevent, stop or minimize such violations.

If the breach of duty affects our own business operations, we will take corrective action to prevent or stop the breach. When (imminent) violations occur in the area of direct suppliers, we work to ensure that the responsible persons in Nokia Germany Purchasing immediately develop a corrective action plan and schedule with the affected suppliers to end or minimize (or avoid) the violation, and that the sustainable implementation of this plan is ensured. If we have substantiated knowledge of an (imminent) violation at indirect suppliers, we develop and implement a plan to prevent, stop or minimize human rights or environmental violations.



We reserve the right to temporarily suspend or terminate the business relationship with our suppliers, at least in exceptional cases (e.g. in the event of very serious infringements of the law or if no milder, equally suitable means can be identified).

We review the effectiveness of the remedial measures at least once a year and on an ad hoc basis, continuously develop them and adapt them to changing conditions.

3.4 Complaints procedure

Independently of the risk analysis and the risks identified here, we have set up an internal complaints procedure. This provides that all affected persons (employees, business partners and third parties) can report human rights and environmental risks and violations of human rights and environmental obligations with regard to Nokia Germany and our suppliers. The complaints procedure is publicly available on the Nokia Germany website ([Nokia in Germany](#)).

We review the effectiveness of the complaints procedure at least once a year and on an ad hoc basis, continuously develop it and adapt it to changing conditions.

3.5 Reporting obligations

We document our efforts to effectively implement our due diligence obligations on an ongoing basis. In addition, starting on January 1, 2025, we will publish an annual report on the fulfillment of our due diligence obligations. We will publish this report on our website no later than 4 months after the end of our financial year and make it available free of charge for a period of 7 years. We will publish further details on this in due course.

Further information on the contents of this policy statement can be found on Nokia's global website (www.nokia.com).
