

Code of Conduct

NOKIA



Business is all about trust.  
Trust is built on integrity.

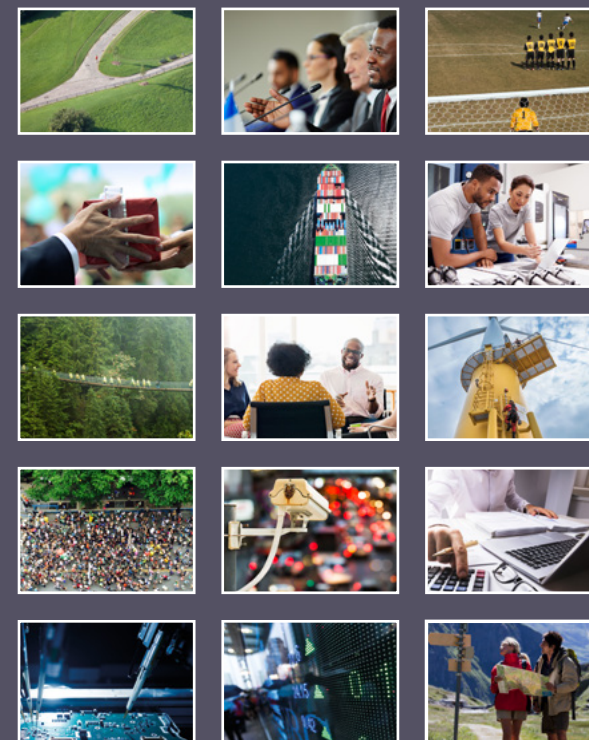
**Your decisions matter.**

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This Code of Conduct has 14 compliance policies, detailed below. Each of these policies is supplemented by a detailed internal policy, a standard operating procedure (SOP), guidelines, or a process document.

Employees should read these policies in conjunction with all such internal documents and processes.





# Letter from the President and CEO

The past few years have been extraordinary.

Climate change, trade disputes and a global pandemic have posed serious challenges to businesses of all types.

Faced by these circumstances, the best businesses draw strength from a strong and clear set of values: a worldview that gives all employees a framework in which to approach new and unusual situations.

Nokia's Code of Conduct is an excellent example.

The Code states our values, clearly and concisely. It explains why they are important and translates them into standards, policies and rules that all Nokia employees are expected to follow.

In other words, the Code unites all of us, in diverse locations and from diverse cultures, behind a common vision.

The Code has been written in a practical style. It identifies specific risks and challenges that employees of international businesses might face. It includes examples. And importantly, it is clear about how we should address those risks, and where to go for help.

By following the principles of the Code, we will succeed collectively, as a company and as individual employees. And we will build trust with customers, suppliers, communities, and each other.

Naturally, the Code cannot provide an answer to every question. In these cases, please stop and think, ask the opinion of colleagues, and act in accordance with Nokia's values.

And most important of all, always speak up when something doesn't seem right.

In doing so, you actively contribute to the success of this great, historic and trusted company.

After all, business is all about trust. Trust is built on integrity. Your decisions matter.

Pekka Lundmark  
President and CEO





# Purpose and scope

## Purpose

This Code of Conduct sets out essential rules and provides guidance to ensure that all of us, including everyone acting on behalf of Nokia, act with unyielding integrity, consistent with the numerous laws, regulations, and policies that govern us.

Our entire business is built on trust; in fact, our stakeholders will not work with us without it. Our Code of Conduct expresses our personal commitment to earning this trust every day, in each community and in all our business activities. It reflects our values through clear and simple direction for all our employees and business partners.

## Scope and applicability

The Code of Conduct outlines standards for ethical behavior by Nokia employees and business partners. It sets out our 4 key principles and 14 key risk areas, each of which are explained in detail. It explains how compliance is a commitment and a responsibility shared by all of us.

The Code of Conduct applies to directors, officers, and employees of Nokia, as well as employees of Nokia's wholly owned affiliates and subsidiaries. The Code also applies to directors, officers, and employees of other business entities (such as joint ventures) in which Nokia owns a majority of the shares or exercises effective control.

Nokia will also make good faith efforts to implement the Code, or ensure the adoption of a similar set of policies, in operating entities in which Nokia actively participates but does not own a majority of shares or exercise effective control. Likewise, Nokia will use its best efforts to have third parties such as suppliers, representatives, and other contractors commit to the same values and principles as those enshrined in the Nokia Code of Conduct. All of Nokia's commercial third parties are bound by our Commercial Third-Party Code of Conduct, which can be found at [https://www.nokia.com/en\\_int/investors/corporate-governance/code-of-conduct](https://www.nokia.com/en_int/investors/corporate-governance/code-of-conduct).



# The four principles of our Code of Conduct



We follow the laws of the countries where we do business and adhere to Nokia's policies and procedures.



We personally set the example for each other and our stakeholders by being honest and fair.



We promote a culture of integrity through mutual respect, trust in each other and high standards of ethics in all our business dealings.



We hold each other accountable to this Code, and if we become aware of potential violations, we promptly report them.

# Your responsibilities

The Code of Conduct sets high standards of integrity for Nokia employees and business partners. It reflects our commitment to acting in an ethical and compliant manner in all our business activities.

Although everyone is expected to know and understand the Code, it does not answer every question or anticipate every difficult situation you might encounter. It sets out a model to help you make the right decisions – decisions that could have a long-lasting impact on you and the company. Know that you are never expected to make tough decisions alone. There are ample resources and channels that are available to you to ask questions and receive guidance.

## In all cases, your obligations under the Code include:

- Reading, understanding, and following the Code of Conduct and its policies and seeking guidance when needed;
- Promptly raising any and all compliance concerns through one of the many channels provided by Nokia;
- Avoiding any practices that may lead to unlawful conduct, an appearance of impropriety, or harm to Nokia's reputation;
- Fully supporting anyone who raises a compliance concern and never retaliating in any way against anyone who does raise a question or concern;
- Cooperating fully in all compliance investigations.

## Role and responsibility of Nokia leaders and line managers

Nokia's leaders – including all line managers – have additional responsibilities when it comes to ethics and compliance. They are compliance stewards for their organizations and are responsible not only for achieving business results but also for driving a culture of integrity throughout their organizations. Leaders “own” compliance within their organizations and are fully accountable for compliance failures that result from their failure to instill and advance this culture in their teams. Leaders are also expected to drive an open reporting environment and encourage a “speak-up” culture.

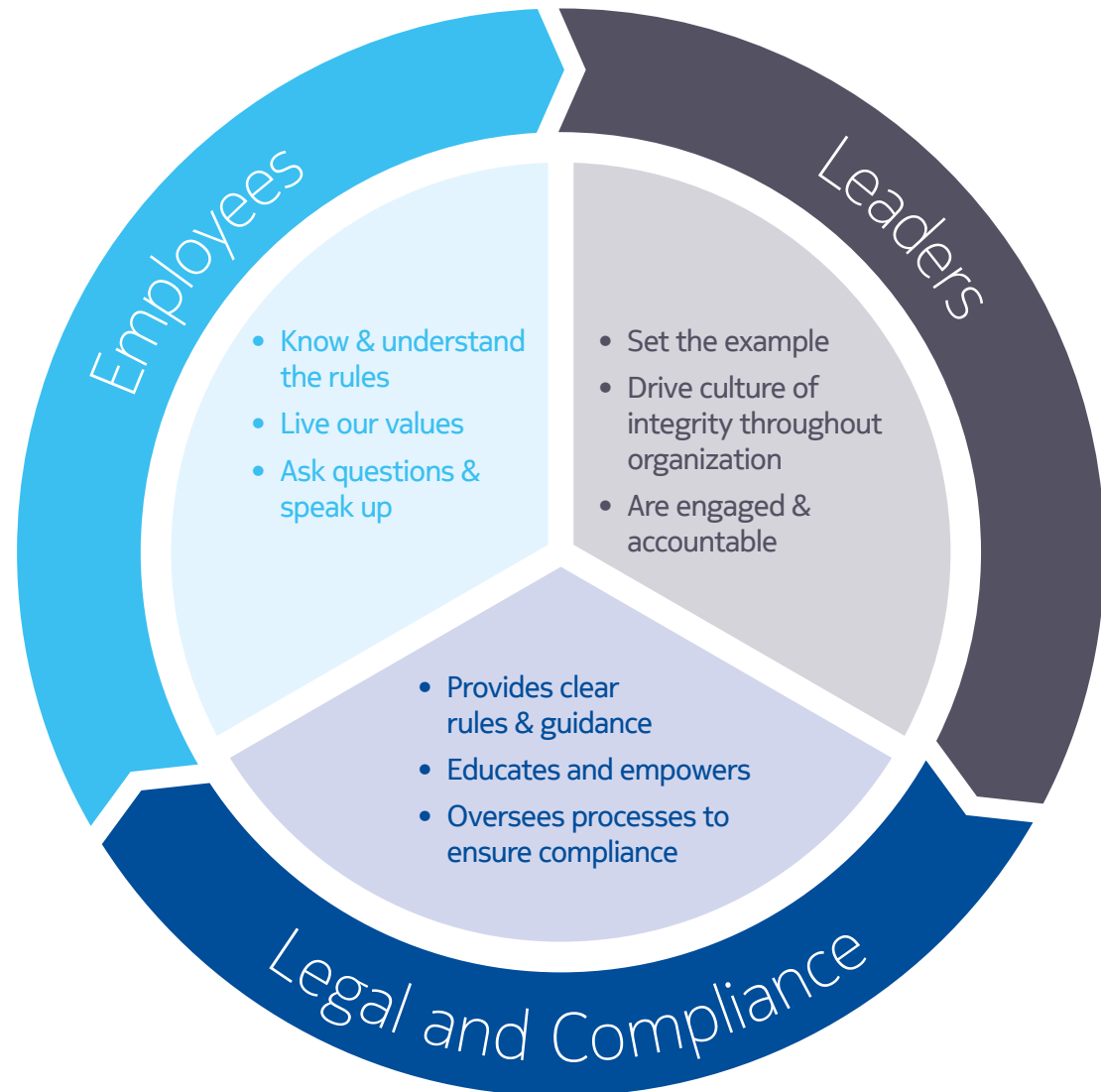
## Leaders at every level must, at a minimum:

- Know and anticipate business compliance risk areas that may affect team operations and take proactive steps to mitigate such risks; set goals to track compliance; and ensure their team is trained to deal with the risk areas;
- Communicate regularly with their team about the importance of compliance, and demonstrate visibly and actively – through words and behavior – their personal commitment to the Nokia Code of Conduct and its policies;
- Emphasize the value of reporting potential compliance concerns promptly and foster an environment of open reporting where employees feel comfortable raising concerns without fear of retaliation;
- Hire and promote only those people who have high standards of integrity and reward and recognize employees who go above and beyond with respect to compliance.



# The circle of responsibility

At Nokia, compliance is a shared responsibility. We all have a role to play in upholding our ethical values and policies.



# The Nokia ethical decision-making model

When faced with a potential ethics or compliance decision, consider these four questions before taking action:



Find out more about ethics and integrity at Nokia: **Conducting our Business with Integrity**<sup>1</sup>

For our commercial third parties: **Commercial Code of Conduct**<sup>2</sup>

<sup>1</sup> <https://www.nokia.com/about-us/sustainability/conducting-our-business-with-integrity/>

<sup>2</sup> [https://www.nokia.com/en\\_int/investors/corporate-governance/code-of-conduct](https://www.nokia.com/en_int/investors/corporate-governance/code-of-conduct)





# Nokia's compliance policies



# Conflict of interest

An aerial photograph of a park. A winding path made of cobblestones and concrete leads through a lush green landscape. A person in an orange shirt is walking on the path. A young tree is planted in a circular area of grass. The path is bordered by a black metal railing. The overall scene is bright and sunny.

## Policy overview

We act in the best interests of Nokia and use Nokia property and resources primarily for Nokia's benefit and to support Nokia's business needs.

Nokia employees should promptly disclose all personal interests that might reasonably be perceived as affecting our judgment to perform our roles at Nokia or that may create an appearance of impropriety.

We avoid any activity at work or outside of work that might interfere with our obligations to Nokia or that could hurt the good reputation of Nokia.



### What to watch out for

- Financial or other interests and positions in companies that you could use to influence Nokia's current or future business regarding those companies and their customers, consultants, or suppliers.
- Decisions where the potentially affected parties have close personal or family relationships with you, or where you or your family might stand to benefit in a personal capacity.
- Recruiting, hiring, or directly supervising family members or personal friends, or promoting someone with whom you have such a relationship.
- Performing outside work during Nokia business hours or using Nokia resources, intellectual property, or confidential information for non-Nokia-related work.
- Serving as an officer or director of a charitable or civic organization that may obtain, or seek to obtain, funding or support from Nokia.

### What you need to know

- A conflict of interest arises in situations where an employee has competing professional or personal interests, making it difficult to fulfill employment duties impartially.
- The mere appearance of a conflict can have negative effects, including damage to reputation, loss of trust, and damage to morale. It is important to consider how your actions might appear and to avoid the perception of a conflict of interest.
- A conflict of interest itself is not necessarily a problem but it must be promptly disclosed and properly managed. A conflict of interest that is not promptly disclosed and/or properly managed may cause others to question your integrity and loyalty to Nokia.

### Consider this scenario:

“

My uncle is a supervisor at one of Nokia's major suppliers. My position at Nokia provides me with discretion to award business to this supplier or its competitors, although others in my group provide oversight for such procurement activities. Is this a conflict of interest?

”

“

Yes. You should disclose this relationship to your manager. You and your line manager should discuss how to handle the matter, presumably by taking steps to ensure that you are not involved in procurement decisions involving this supplier or its competitors.

”



# Dealing with government officials



## Policy overview

Nokia engages with international bodies, governments, and government officials at multiple levels and in a variety of ways, including:

- As a business providing goods and services;
- As a concerned corporate citizen petitioning to protect our interests;
- As a taxpayer;
- As a private sector participant providing jobs and economic opportunities in many countries around the world.

When interacting with government officials, we follow high ethical standards and act in a transparent manner. We are honest, truthful, and accurate, and we follow Nokia's policies and procedures and any applicable laws. Special requirements apply to our interactions with government customers and state-owned enterprises, including, for example, rules relating to procurement, lobbying, entertainment, hospitality, disclosure, and record-keeping.

### What to watch out for

- Government officials requesting information from Nokia: Verify that the officials have a right to such information and that Nokia has a right to deliver such information. When applicable, follow the relevant procedure or seek guidance from Legal and Compliance.
- Public procurement rules: Do not deviate from a government's public procurement or tender process, even when a government official may indicate that such a deviation is acceptable or condoned.
- Recruiting a government official or member of the official's family for employment at Nokia while the official is in a position to influence Nokia's business with the government may lead to perception of conflict of interest and may violate applicable laws and regulations regarding hiring from the government.
- Offering gifts or hospitality to government officials when the gifts or hospitality do not comply with applicable law, including local rules and regulations, as well as established Nokia thresholds and approval requirements for corporate hospitality.
- All activity that might be perceived as an undue attempt to influence the behavior or decision of a governmental official.

### What you need to know

- Government officials include not only employees, agencies, and other representatives of national, regional, local, and municipal governments, but also employees of government-owned enterprises and anyone acting for, or on, their behalf, as well as close family members of government officials.
- Business practices that are acceptable when dealing with private companies or partners, such as providing hospitality or certain pre-tender sales activities, may be unacceptable or illegal in government business.
- Nokia's policy does not permit participating in the political or electoral process through direct donations to political groups, but Nokia does protect its interests through lawful and transparent advocacy with governments.
- Your personal political activity, such as support or advocacy relating to laws and policies or support for and donations to candidates for office, may be appropriate, but it must also be lawful, be conducted on your own time with your own resources, and in no way involve or be perceived to involve Nokia.
- Nokia employees should contact the Nokia Government Relations team when planning to engage with a government official for advocacy or relationship purposes.

### Consider this scenario:

“

Nokia is hoping to increase its market share in a country where the telecommunications sector is heavily regulated. You have been asked to arrange an overseas trip for several important customers as well as senior members of the regulatory agency to showcase Nokia's network equipment. Is this acceptable?

”

Probably not. The rules governing travel, hospitality, and entertainment may differ depending on whether a guest is a government official or employee of a state-owned enterprise or private company. Customer travel may be permitted under certain conditions for private company employees, but different standards often apply for government officials and employees of state-owned enterprises. In this scenario it would be advisable to engage with the Legal and Compliance team to seek guidance.



# Fair competition



## Policy overview

Nokia competes fiercely but fairly.

In most countries there are competition or antitrust laws that regulate the activities of companies in the marketplace to ensure fair competition for the benefit of consumers and market participants.

These laws prohibit anti-competitive agreements or understandings between competitors. They also restrict the behavior of dominant companies and require advance review or permission for mergers, acquisitions, or other commercial arrangements that might affect competition.

Compliance with competition laws and fair competition is part of Nokia's way of doing business and is important to our business strategy.



### What to watch out for

- Even informal discussions can give rise to competition issues. An agreement or arrangement can be illegal even if it does not take the form of a formal written contract; a mere informal understanding between competitors can be regarded as anti-competitive.
- Take care with language in all documentation and communication, including emails and instant messages, to avoid expressions being misinterpreted. For example, avoid speculating whether an activity is legal or illegal, do not describe Nokia as being dominant, and avoid statements giving misleading impressions.
- For any meetings with competitors, create an agenda and take care that discussions do not stray into sharing confidential or competitively sensitive information.
- Leave any call or meeting if you are concerned that confidential or competitively sensitive information is being discussed, making sure that your exit is noted in the record.

### What you need to know

- You are responsible for knowing and understanding applicable competition rules and principles. Consult with Legal and Compliance any time you have a question or need guidance.
- It is illegal to share or exchange with competitors confidential and competitively sensitive information such as cost and pricing information or other commercial conditions, future strategies, plans, or product roadmaps, as well as tender offers or bids.
- It is illegal to agree or align competitive behavior in the market with Nokia competitors, such as setting prices or agreeing on conditions of tender offers or bids and dividing or allocating markets, geographic territories, customers, or sources of supply.
- Cooperation with competitors in the form of consortia, joint bidding or forming a joint venture, or other joint operations requires consultation with our Legal and Compliance team.
- Entering into exclusive arrangements with partners, restricting resellers' ability to set the resale price of products, or imposing restrictions concerning exclusive territories or customers require consultation with our Legal and Compliance team.

### Consider this scenario:

“

I just received some confidential pricing information about a competitor. I did not ask for it, but this kind of information could be useful to me. What should I do?

”

“

If you receive any confidential or competitively sensitive information about a competitor, either directly or indirectly (for example through a customer), refrain from circulating or using it, and consult Legal and Compliance. You may respond to the sender of the information that you did not seek the information and emphasize Nokia's commitment to competition law compliance.

”

# Improper payments

A close-up photograph of a hand holding a small, square gift box wrapped in red paper with a silver ribbon. The hand is positioned as if presenting the gift. The background is blurred, showing other people in a social setting.

## Policy overview

Nokia wins its business on merit. We will not tolerate improper or corrupt payments, including bribes or kickbacks, made directly or indirectly to or from a customer, government official, or third party, including:

- Improper gifts;
- Entertainment, gratuities, favors, donations;
- Any other inappropriate transfer of value.

Facilitation payments (sometimes referred to as “grease payments”) are likewise prohibited. We will engage only reputable third parties who share our commitment to integrity.

Nokia is committed to complying with all applicable financial record-keeping and reporting requirements and all other applicable anti-money laundering laws and regulations, as well as laws and regulations applicable to terrorist financing and facilitation of tax evasion. Nokia conducts business only with customers involved in legitimate business activities with funds derived from legitimate sources.



### What to watch out for

- Unusual, excessive, and out of the ordinary requests for travel, lodging, hospitality, or any other benefit for government officials, customers, or their family members or friends.
- Requests for donations to charities or organizations that may be affiliated with a government official or a customer.
- Service providers that suggest unusually “fast” clearance of goods through customs, visas, or work permits through immigration, or issuance of government permits.
- Requests to record a transaction inaccurately or incompletely or to expedite approval or payment in a way that might compromise financial controls.
- Receipt and approval of false or inflated invoices from a supplier. Payment of such invoices can be used to fund kickback schemes.

### What you need to know

- An improper payment involves any transfer of value (not only cash, but also any other benefit, hospitality, or thing of value) that is unlawful under applicable law or not permitted by the recipient’s rules or Nokia’s policies and procedures.
- Exercise prudence and caution when interacting with government officials, which can include employees of a customer that is a state-owned or controlled enterprise.
- Never give – or authorize a third party to give – a gratuity to a government official to expedite a service, such as customs or immigration clearances, permits, or issuance of licenses or approvals.
- Improper payments can expose you and Nokia to criminal prosecution. Always seek advice if you are uncertain about the legitimacy of any payments or the purpose thereof.

### Consider this scenario:

“

I am responsible for an important customer account. The customer has asked me to push through a new purchase order that includes a “one-off” fee to be paid to a subcontractor selected by the customer for part of the project implementation. I am not sure what the fee represents, and upon asking the customer, I do not get a clear response. What do I do?

”

“

There is a risk here that the fee is a disguised kickback or other improper payment. Any requests for payments that look unusual and cannot be tied back to legitimate goods or services should be challenged; speak to someone like your line manager, your local ombuds leader, or the Legal and Compliance team if you have concerns.

”



# Trade compliance

## Policy overview

The provision of items, including but not limited to hardware, software, documentation, source code, technical data, or other technology around the world, is regulated by national and international laws that may impact Nokia's operations in multiple ways.

The physical or electronic transmission (in paper format, by email, or through the web) of goods across borders, or even the written or oral exchange of information among citizens of different nations who are all co-located in one country, may be strictly regulated.

Nokia is committed to compliance with all applicable trade laws and regulations that impact its operations, including export control and customs compliance. We are committed to preparing, executing and reporting international business accurately and transparently to trade authorities.



### What to watch out for

- Manual shipments, luggage carried on business trips, and any controlled technology transmitted by email, server access, or other means.
- Payments to a customs broker that exceed the invoice or are for suspicious or unidentified services; any inaccurate description, classification, or valuation of goods or data on invoices, customs forms, and other related documentation.
- Companies or persons that attempt to evade applicable trade laws to a prohibited destination via trans-shipments: refuse to cooperate with them.
- Unclear, vague, or incomplete answers from customers or third parties about the end use/end user, delivery dates, and locations.
- Import and export declarations, documentation, and product markings and packaging that are unclear or inaccurate. Failure to adhere to applicable laws, regulations, and policies for all imports and exports, including temporary exports such as for repairs or for marketing events.

### What you need to know

- Consider and apply the applicable trade rules when arranging any cross-border transactions, including financial transactions, technology transfers, transactions that are free of charge, returns, or hand-carried goods.
- If you initiate exports or imports – even occasionally – you must follow the applicable laws of the respective countries. All imports must be declared accurately with correct documentation and value. The right country of origin is required for import declaration and taxation. Import and export documentation must be carefully archived for audit purposes.
- Exports can take many forms, including the physical transfer of goods and the disclosure of information in paper format, via electronic means, or aurally or verbally through technology exchanges (e.g. by email or through online collaboration sites; in meetings, workshops, and product demonstrations; or during laboratory visits, conferences, etc.).
- Carrying electronic devices that possibly contain controlled information across borders could be considered an export; this includes information held on laptops and other personal electronic devices.
- Many countries impose restrictions on the transfer of certain technologies and data. Some countries completely forbid business with certain other countries. Export restrictions and sanctions may apply.

### Consider this scenario:

“ A Nokia customer in a sanctioned country has an urgent need for certain replacement parts. Shipment directly to the customer from a Nokia facility would result in delays while we wait for government authorities to approve the shipment. Someone suggests that we ship the materials to a third party in a country that does not have sanctions on the customer’s country, so that the third party can ship the parts on to the customer without any delay. Is it okay to follow this suggestion? ”

“ No. The trans-shipment of goods to circumvent laws governing international trade is prohibited. You should speak to Nokia Global Trade Management (GTM) to fully understand the export control regulations and follow them accordingly. ”

# Working with third parties

A man and a woman, both wearing light grey polo shirts, are leaning over a desk in a factory or industrial setting. They are looking at a laptop screen. The man is on the left, and the woman is on the right. In the background, there are blue industrial machines with various controls and warning labels. The overall scene is brightly lit, suggesting a professional and collaborative work environment.

## Policy overview

Third parties include any person, organization, or company with which Nokia contracts, including suppliers and commercial third parties.

Nokia seeks productive, ethical, and transparent relationships with its third parties. We expect all our third parties to be qualified according to Nokia standards, to follow and exceed all applicable laws and regulations, and to share the values expressed in our Code of Conduct.

Our commercial third parties are expected to comply with the requirements of the Nokia Commercial Third-Party Code of Conduct<sup>3</sup>. Giving gifts or hospitality to our third parties, or accepting gifts or hospitality from them, is done only in compliance with applicable laws, regulations, and Nokia policies for corporate hospitality.

<sup>3</sup> <https://www.nokia.com/about-us/investors/corporate-governance/code-of-conduct/>



### What to watch out for

- Being pressured by a customer or counter-party to select a specific third party in connection with a business transaction, when such third party raises red flags.
- Third parties offering money or anything of value in order to be selected to work with Nokia or offering unusual deviations from lawful and ordinary business practices in order to be selected (e.g. hiring your relative).
- Third parties that refuse to acknowledge and commit to following Nokia values and principles, the Code of Conduct and/or Nokia's Commercial Third-Party Code of Conduct.
- Third parties that are owned or controlled by the government or by a government official or close family member, or with otherwise opaque ownership structures, or a supplier that claims it can exercise improper influence with the government or with a customer.
- Conflicts of interest in conducting business with third parties; for example, when someone in your family or anyone else with whom you have a close personal relationship has a substantial role in, or relationship with, a certain third party.

### What you need to know

- Be familiar with key purchasing policies, compliance screening, and onboarding requirements to ensure that we engage only third parties who will comply with applicable laws and policies, who share our commitment to ethical business practices, and who will not tarnish Nokia's brand or reputation.
- Immediately raise a concern if you are asked to select or deal with a specific third party and/or deviate from the approved third-party selection and contracting process.
- Nokia will terminate business relationships with third parties who engage in questionable or unlawful business practices.
- Know and understand Nokia's policies on gifts, entertainment, and hospitality. Report attempts by third parties to provide anything of value that exceeds Nokia thresholds and approval requirements within the Corporate Hospitality and Gifts Standard Operating Procedure.

### Consider this scenario:

“You are about to close a substantial deal with an important customer. The deal requires certain local services where Nokia will be required to hire one or more local vendors. The customer is pressuring you to hire an untested third-party contractor to oversee the local services, claiming they have the necessary “connections” to get the work done quickly. It is unclear who the actual owners of the firm are. Is it safe for you to hire this contractor?”

“Proceed with caution and engage with the Legal and Compliance team. There are several red flags indicating that Nokia ought not to do business with this third party. These include the fact that the contractor lacks a proven track record, has opaque ownership, and may use its influence or connections to cut corners or act contrary to laws or Nokia values.”



# Environment

A group of people, some wearing yellow raincoats, are walking across a suspension bridge that spans a deep, dense forest. The trees are tall and green, with some autumn-colored leaves visible. The scene is misty and atmospheric.

## Policy overview

Nokia's longstanding commitment to the protection of the environment and management of environmental issues actively, openly, and ethically meets and often exceeds legal and regulatory requirements.

Nokia continuously seeks to prevent pollution and to reduce the environmental impacts of its products and services during design, procurement, manufacturing, use, and end-of-life.

We also expect our business partners and suppliers to share our commitment to the environment.



### What to watch out for

- Failing to promptly address environmental complaints or concerns from employees, suppliers, customers, or other third parties.
- Suppliers or contractors that do not engage in sound or sustainable environmental practices.
- Ignoring applicable environmental regulations or company guidelines.
- Missing opportunities to decrease the environmental impact of our products and services by reducing waste, increasing energy or material efficiency, or preventing pollution.
- Obtaining, maintaining, renewing, and extending all environmental permits, licenses, or other clearances (such as environmental impact studies) on the timely basis that is necessary to Nokia's operations.

### What you need to know

- Nokia meets or exceeds the legal requirements for protecting the environment. Nokia expects its employees, suppliers, contractors, and other business partners to follow the same or equivalent standards, placing a high priority on protecting the environment.
- By working continuously to reduce the environmental impacts of Nokia products throughout their life cycles – including design, procurement, manufacturing, use, and end-of-life – Nokia enables customers and users to reduce their environmental footprints.
- Be aware of the environmental impacts relevant to your work and how specific environmental requirements are met in your work function, such as product requirements in research and development or transportation selection in logistics.
- Take immediate action to remedy situations in which incidents, audits, and feedback highlight areas for improvement in Nokia's environmental management.

### Consider this scenario:

“

I am part of a research and development team that is finalizing a new product. I am concerned that the environmental impact of the product is being downplayed or overlooked; there are certain aspects of the product design that could have a negative environmental impact. Should I do anything?

”

“

Yes. Nokia is wholly committed to protecting the environment and will not compromise on damaging our planet for profit. We will only develop products that have been fully and properly assessed for environmental impact. The R&D team will not be permitted to bypass correct environmental processes. You can raise your concern with the development project manager, your line manager, or Legal and Compliance to ensure that your concerns are considered, and that this environmental aspect is not overlooked.

”

# Fair employment

A photograph of two people in an office setting. A man with a beard and glasses, wearing a light pink button-down shirt, is smiling broadly and gesturing with his hands as if in conversation. He is looking towards a woman whose back is to the camera. She has dark curly hair and is wearing a yellow shirt with white polka dots. They are sitting at a table, and a green cup is visible on the table. The background shows a window with a view of a city or landscape.

## Policy overview

Equality and respect are fundamental to our culture. To that end, Nokia promotes a diverse and inclusive workplace where opportunities for achievement and growth are based on merit. Discrimination, harassment, and retaliation, in any form, are prohibited.



### What to watch out for

- Any people decision that is inconsistent with Nokia's values, violates the right to equal opportunity, or is not based on merit or legitimate business reasons.
- Creating a hostile work environment, bullying, or similar offensive conduct, such as making derogatory comments or displaying materials that are offensive.
- Taking adverse action against anyone because they raised a good faith concern regarding a violation or potential violation of Nokia's Code of Conduct or applicable law.

### What you need to know

- Nokia provides equal opportunities to all employees in every aspect of employment, including recruitment, hiring, compensation, job assignment, promotion, and termination.
- All employment decisions are made without regard to gender, race, religion, color, nationality, ethnic origin, citizenship, age, disability, sexual orientation, gender identity, characteristics or expression, marital status, membership or non-membership in a trade union, or any other protected class. No one should be treated less favorably on the grounds of such characteristics.
- Nokia promotes a work environment free from any intimidating or offensive behavior everywhere we do business and for everyone, including our employees, customers, suppliers, and business partners. This includes, for example, any verbal, physical, or other interaction that could be construed as hate speech, trolling, harassment (sexual or otherwise), or bullying, whether done face-to-face or electronically.
- Our communication with one another and third parties is always professional, respectful, and free from bias.
- Our employment standards are high, and we do not waver. Even where applicable laws or regulations would allow or do not specifically forbid certain practices, our Code of Conduct applies.

### Consider this scenario:

“ A coworker has asked you out for coffee or dinner outside of work on multiple occasions, and you have repeatedly declined the invitations. They often stand uncomfortably close to you in the office and occasionally put their hand on your shoulder during your conversations. You mentioned this to your line manager, who defended the coworker, explaining that they were just being friendly. What should you do? ”

“ You should not have to endure behavior such as this if it makes you uncomfortable. Speak with Human Resources, a manager above your line manager, your local ombuds leader, or Legal and Compliance to register your concerns and request that action be taken. ”

# Health, safety and labor conditions



## Policy overview

We are passionate about making sure that everyone who works for, or on behalf of, Nokia goes home safely at the end of the day.

We earn the respect of each other, our contractors, our partners, our customers, and members of the public by providing a safe, healthy, and fair working environment.

We do this through the robust and consistent implementation of our internal processes – processes that meet or exceed applicable regulatory requirements. We also expect the same of our contractors and suppliers.



## We respect our people and community

## Health, safety & labor conditions

### What to watch out for

- Situations that could be dangerous, such as a colleague not wearing a safety belt in a taxi, participating in a conference call while driving, or working at steep heights without the proper safeguards in place.
- Anyone who disregards our policies or legal requirements or otherwise acts in a way that places others at risk, such as a manager requesting someone to work when that person is not fit for duty.
- Colleagues who appear to be struggling at work or are not coping because they feel overloaded, are concerned about organizational change, or have pressures outside of work that are contributing to a feeling of being overwhelmed and in need of support.
- Opportunities in your daily work routines that will increase the likelihood of everyone going home safely following a good day at work.

### What you need to know

- Health and safety management is integrated into our business and processes; this includes the design, production, distribution, installation, and support of our products and systems.
- We continuously improve our health and safety performance through robust, consistent, and transparent risk management, constantly seeking to learn and share to prevent work-related accidents, and implementing (where possible) new working practices and technologies.
- We want everyone to have a good day at work, and to be able to achieve an optimal balance between high performance and a healthy, happy, and fulfilling home life.
- We take immediate action to correct situations in which incidents, audits, and feedback identify areas for improvement, and we build sustainable, scalable, and repeatable solutions.
- We expect our suppliers, contractors, and other business partners to meet the same standards and place equally high priority on health, safety, and labor conditions in their operations.

### Consider this scenario:

“As the project manager, I am under immense pressure from my customer to complete outstanding tasks on various sites. I have explained to our engineering teams how important it is that we get the work done quickly – it will largely determine whether we win future contracts from the customer. I have asked them to work very long hours and over weekends. Although I expected this to be for one or two weeks, it has now been going on for well over a month. Is this practice OK?”

“You may have acted outside of the Nokia Code of Conduct, as your actions may place the engineers at risk, jeopardizing their health, safety, and well-being. They might make mistakes because of fatigue, exhaustion, or other factors, and those mistakes could have serious health and safety consequences. You should have considered alternatives, such as negotiating a project extension with the customer or bringing in additional resources.”



# Human rights

An aerial photograph showing a large, diverse crowd of people gathered on a city street. The crowd is dense and colorful, with many individuals holding signs and banners. The street is lined with trees and buildings, and the overall atmosphere appears to be one of a significant public demonstration or protest.

## Policy overview

Nokia provides products and services that expand opportunities to communicate and contribute directly to the exercise of such fundamental rights as free expression and political participation.

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.



### What to watch out for

- Conducting business in countries where the rule of law is weak or where the government is not a result of free and open democratic processes.
- Requests for subscriber data beyond that which is provided in the normal course of business in cases where Nokia manages the network.
- Requests from operators in higher-risk countries for specific features, such as location-based data or more detailed subscriber data on traffic or events, in addition to standard functionality.
- Suppliers or contractors that appear to employ underage workers or fail to provide safe or healthy workplaces or adequate employment documentation upon request, including records of wages paid.
- Use of minerals from conflict countries that are regulated by international authorities.

### What you need to know

- Nokia provides limited, core “lawful intercept” capabilities based on clear standards and on a transparent foundation in law. Operators are required in most countries, as part of their license to operate, to provide such capabilities and to assist authorities in legitimate law enforcement.
- Nokia conducts due diligence in the pre-sales process and follows international standards to help ensure that our products are used to enhance, and not infringe, human rights.
- Nokia also conducts due diligence on its suppliers and business partners to ensure that they share Nokia’s commitment to human rights.
- Nokia complies with applicable laws and participates in industry initiatives to support human rights and to validate that the minerals and metals used in our products do not contribute to conflict.
- Nokia does not unlawfully or improperly use or exploit natural resources. Nokia tracks the origin of the metals in our products through the supply chain back to smelters.

### Consider this scenario:

“

I have heard that one of our suppliers withholds employees’ passports for ‘safekeeping,’ and their wages are held in accounts controlled by the employer. Is this a concern?

”

“

Yes. It is your obligation to raise this issue with Legal and Compliance or through one of the reporting channels. Employers who retain travel documents and have other unacceptable controls over employees might be committing modern slavery offenses. It is an obligation to report this to the company.

”

# Privacy

A white security camera is mounted on a metal pole. The camera is positioned in the upper left quadrant of the frame. The background is a dark, out-of-focus scene with numerous colorful bokeh lights in shades of red, orange, yellow, and blue, suggesting a night cityscape or a busy street. The camera has a white plastic housing and a white cable extending downwards.

## Policy overview

We respect privacy. Privacy is important for all of us as individuals. It is also increasingly necessary for Nokia to hold itself up to the highest standards in relation to protecting personal data.

Our business is built on trust. Respecting privacy is not simply about being compliant with laws; it is a fundamental value for Nokia as a trustworthy and ethical company.

Nokia collects, uses, holds, and otherwise processes personal and customer data responsibly, lawfully, and carefully. We build privacy and security into the design of our products and services and employ appropriate safeguards to protect personal data against unauthorized use or disclosure.



### What to watch out for

- Only process, store, and share personal data when there is a legitimate business purpose for doing so. When accessing, processing, storing, and transmitting personal data, ensure you follow best practices and Nokia's privacy statements, procedures, and policies.
- Make sure you also follow the requirements defined in our customer contracts about how we access, collect, and handle personal data. Do not collect, process, or store personal data in a way that is incompatible with our customer commitments or our internal privacy requirements.
- When storing personal data, ensure it is in a protected environment. Do not leave personal data on a printer, shared server, or publicly accessible computer or website.
- Only disclose personal data to those persons and organizations authorized to access it.
- Securely destroy personal data when it is no longer needed or as instructed in the Nokia data retention policy.

### What you need to know

- Personal information refers to any data that could identify an individual. This may include direct, business, and Human Resources-related information such as contact details, personal profiles, or the voice, image, and location of an individual. However, it also extends to indirect information such as subscriber identities and device or application identifiers. When in doubt, you should treat information as personal data until you are certain that it is not.
- Only access and use the personal data that is necessary to fulfill your assigned job responsibilities. Make sure you protect personal data physically and electronically by storing it only in environments authorized by Nokia.
- If you suspect a breach of personal information, you should report it immediately to your line manager or the Information Security team, so it can be managed efficiently and effectively.
- Make sure you are familiar with the privacy procedures that define Nokia's privacy vision, principles, and governance model for managing privacy, especially in relation to your role at Nokia.

### Consider this scenario:

“

Someone accidentally emailed me a Human Resources report that includes names, government IDs, and passport numbers. Should I just close the document and forget that I saw it?

”

“

No. The disclosure of this information to you, even if inadvertent, may require remedial actions. Further, if it was provided to you, it might also have been given to others without proper authorization or the need to know. Contact your line manager or Legal and Compliance and inform them about the document you received.

”

# Controllership



## Policy overview

Nokia classifies and records its transactions and assets accurately and implements appropriate controls to represent its financial data accurately and consistently, protect its assets, and report its transactions in a timely and objective manner.

Nokia is committed to complying with the applicable laws and regulations that govern its financial accounting and reporting to government agencies, investors, and the public.



### What to watch out for

- Financial transactions recorded in error, with the wrong date or with a misleading description, including false expenses and purchase orders or inaccurate time sheets and vouchers.
- Transactions that do not make fundamental business sense, decisions that are inconsistent with sound business economics, or financial results that do not appear consistent with actual business performance.
- Efforts to avoid appropriate reviews for a transaction or actions inconsistent with an employee's level of authority.
- Physical assets that are not appropriately protected against loss or theft, or any effort to dispose of an asset without proper authorization.
- Any absence of controls on transactions such as dual signatures on checks or required approvals on expenses, particularly where cash is involved.

### What you need to know

- Make and maintain complete and accurate records of Nokia's financial transactions and assets, including operating metrics and results, to ensure a complete audit trail.
- Pay close attention to the safekeeping of Nokia's financial, physical, and informational assets, including intellectual property.
- Before signing a document or approving a transaction, verify the facts and completeness of the information, and consider the underlying business rationale for the approval.
- Ensure that Nokia's accounting and retention procedures, as well as other applicable accounting principles and regulations, are consistently followed; when in doubt, ask.
- Do not create fraudulent records, falsify documents, or otherwise misrepresent facts, transactions, or financial data. Be candid and transparent.

### Consider this scenario:

“

My team did not utilize all the budget approved this year. To maintain the same funding amount next year, is it acceptable for me to ask a vendor to pre-bill Nokia this year for one of next year's projects?

”

“

No. This would qualify as falsifying expenses recorded in our books and records, misrepresenting when the company would incur the expense. The law requires us to maintain accurate books and records and the company could face significant fines.

”



# Intellectual property and confidential information

## Policy overview

Nokia invests in and rewards innovation.

Nokia's intellectual property – which includes patents, software, and other copyrighted materials; know-how and trade secrets; and brands and trademarks – is among its most valuable assets.

We actively protect our intellectual property and follow Nokia classification and handling guidelines for our intellectual property and confidential information. We respect the valid intellectual property and confidential information of others.



### What to watch out for

- Obtaining or using ideas, material, or information belonging to another person or company without proper authorization, which could include copying or using images, open source software, unsolicited ideas from outsiders, or written material obtained from online sources or third parties.
- Giving licenses, rights, or access to our intellectual property or other information without authorization or accepting intellectual property or confidential information without consulting Legal and Compliance.
- Sending sensitive information to unattended printers, discussing confidential information openly when others might be able to hear, or creating written material without labeling it according to Nokia information classification and handling instructions.
- Misuse of Nokia intellectual property or confidential information by others, which might include for example “reverse engineering” of Nokia’s patented products, processes, services, or designs. Report such misuse immediately to Legal and Compliance.
- Failing to honor your obligations under a non-disclosure agreement or invention assignment agreement between you and Nokia.

### What you need to know

- When dealing with intellectual property or confidential information, ask these questions:
  - Who owns this? May I use it?
  - With whom may I share this?  
How do I protect its value?
  - Has the term of my licensed use expired?
  - If so, is there any action I need to take?
- Authorization to grant rights under Nokia-owned intellectual property, particularly rights under patents, is strictly limited, and you must not grant such rights without the required internal approvals.
- Protect Nokia confidential information and trade secrets from unauthorized disclosure and misuse, and do not share such information with third parties except under approved terms that restrict its disclosure and use.
- Respect and protect the intellectual property and confidential information of others with the same degree of care we afford our own and according to the terms of any applicable agreement.
- Follow Nokia’s processes and engage our intellectual property teams to help you properly harvest, protect, and enforce intellectual property and confidential information rights, including the review of any conflict of interest situations that may impact Nokia’s intellectual property.

### Consider this scenario:

“

I have just developed an idea to solve a technical problem. How can I find out if the idea should be protected by a patent?

”

“

The first stop should be the Nokia Inventor Central web page, where you will find information on the invention submission process, patent protection, inventor recognition, and more. If you have further questions, reach out to Nokia’s Intellectual Property team.

”

# Insider trading



## Policy overview

Nokia is a large, global, publicly traded company. Virtually every country regulates its capital markets, and a key element of such regulations relates to equal access to information about the shares traded on the exchange.

In their work, employees may learn material, non-public information about Nokia or other companies. Using this material, non-public information for personal or financial benefit, for example to buy or sell shares, or sharing this information with others, impairs the integrity of the market, violates our policies, and is likely a violation of the law.



### What to watch out for

- Buying or selling a security based on information you heard or learned at work or anywhere else that you believe will affect the price of the security once that information becomes publicly known.
- Sharing non-public information about Nokia or other companies with anyone such as friends, family, or business associates who might then use this information to engage in financial trades.
- “Tipping off” or recommending Nokia or other securities to anyone such as friends, family, or business associates when you might have material, non-public information about Nokia or other companies.
- Engaging in any trading activities when you are in possession of inside information, especially immediately prior to, or in connection with, a major company announcement or earnings release. If you are a Financial Reporting Person, as defined in the Nokia Insider Policy, you also need to follow the closed window periods specified in the Policy.

### What you need to know

- Inside information means any material, non-public information regarding a company or its securities that, if disclosed, would likely have a significant effect on the price of those securities or influence one’s decision to buy, sell, or hold the securities.
- While holding inside information, employees are prohibited from:
  - Trading in (purchasing or selling, directly or indirectly) the company’s securities;
  - Recommending or advising others in trades in the securities;
  - Disclosing such inside information to another person.
- If you believe that there is a legitimate business reason to disclose inside information in the normal course of your employment, please consult with Legal and Compliance or the designated project owner of the related insider project before doing so.

### Consider this scenario:

“

I have learned that Nokia is considering acquiring a small, publicly traded software company. As long as it will not benefit me personally, can I share this information with someone who could acquire some shares of this company in anticipation of the acquisition?

”

“

No. The sharing of material, non-public information violates the Nokia Code of Conduct and Nokia policies, and is generally illegal.

”

# Speaking up

Violations of our Code of Conduct erode the trust we have built with our shareholders, customers, and other stakeholders. In addition, failure to follow the Code can put your colleagues and our business at risk. For these reasons, you are obligated to raise a concern promptly if you become aware of a potential or suspected violation of the Code. By quickly reporting potential violations, you are helping the company maintain its reputation and address potential problems before they have an adverse impact – be it financial, reputational, or legal – on the company.

## Nokia's policy on non-retaliation

Nokia is committed to maintaining a culture in which our employees feel comfortable raising concerns about potential violations of the Code of Conduct. Nokia will not tolerate any adverse employment action against an employee who raises a compliance concern in good faith. Any employee who retaliates or participates in retaliating against another employee for raising a compliance concern will be subject to strict discipline, up to and including termination of employment.

## Confidential reporting

Concerns can be raised to the Ethics Helpline anonymously (although a small number of jurisdictions impose certain limitations on anonymous reporting). Should you elect to raise your concern anonymously, you will not be required to provide your name or other identifying information. You should, however, provide sufficient details regarding your concern so that Nokia can follow up appropriately. Nokia respects anonymity and uses the Ethics Helpline case management system to communicate with anonymous reporters.





# Speaking up

## Addressing concerns

We take each concern seriously. 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.

At the end of the investigation, if it is determined that an employee has violated applicable laws, policies, or the Nokia Code of Conduct, corrective action including disciplinary action may be imposed. We will share feedback, while respecting confidentiality, with the person who raised the concern and share lessons learned with the wider business.

## Corrective action and discipline

An important aspect of our compliance program is taking effective corrective action and, where appropriate, employee disciplinary action. Subject to local law, disciplinary action, up to and including termination of employment, will depend on several factors, including but not limited to:

- The conduct being intentional or deliberate or involving a law violation;
- The conduct involving dishonesty, theft, fraud, or personal gain;
- The conduct being repetitive or systemic or involving efforts to conceal;
- The employee's full and complete cooperation (or lack thereof) with the investigation;
- The employee's seniority within the organization; the higher the level of seniority, the higher the responsibility to lead ethically.

Employees will be provided with an opportunity to present any additional relevant information that may not have been considered before a disciplinary decision is made.



# Speaking up

## Ombuds Program

Nokia's speak-up culture and non-retaliation policy empowers employees to openly raise and discuss compliance questions and concerns and to seek guidance. The Ombuds Program is a critical element of our compliance program and culture. It is designed to support and strengthen an environment of fairness, equality, respect, and honesty, where everyone is expected to deliver results without compromising integrity.

Nokia has appointed a global network of local ombuds leaders who are selected and trained to provide neutral and confidential guidance to its employees on ethical and compliance matters.

In situations where next steps may not be very clear, ombuds leaders provide guidance to employees, help determine if a matter warrants being reported, and identify appropriate resources if needed.

Ombuds leaders are a supplemental channel for raising compliance concerns in addition to line managers, Legal and Compliance, Human Resources, and the Ethics Helpline.

## Channels for speaking up

Nokia provides multiple channels to raise a concern. You may talk to your line manager, Legal and Compliance, Human Resources, 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.





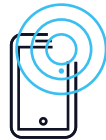
# Speaking up



## Online

<https://nokia.ethicspoint.com>

You can access Nokia's Ethics Helpline by clicking on the link. Nokia employees can also access it by clicking on the "EthicsPoint" desktop icon on their PC.



## Phone

[www.nokiaphone.ethicspoint.com](http://www.nokiaphone.ethicspoint.com)

You can access local calling numbers by clicking on this link. You can conduct your call in any of 23 available languages; simply select the language you are most comfortable with.

## Mobile app

Nokia's Code of Conduct is available to download via a mobile app. The mobile app has a dedicated link on which you can report concerns. Nokia employees can visit the Ethics & Compliance intranet site to access a link to the app.



## Email

[ethics@nokia.com](mailto:ethics@nokia.com)

[ombuds@nokia.com](mailto:ombuds@nokia.com)

You can write an email to either of these addresses to report your concerns.



## People you can talk to

**Line managers:** Your line manager or any line manager in Nokia can be approached to raise a concern or discuss a compliance matter.

**Ombuds team:** Employees can speak with a local ombuds at their site or reach out to any of our ombuds located in any country to seek guidance.

**Legal and Compliance team:** Employees may also reach out to any member of Nokia's Legal and Compliance team.

**Human Resources team:** Nokia's Human Resources team is always available to speak to employees and can be approached to raise concerns.



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[nokia.com/about-us/investors/corporate-governance/code-of-conduct](https://nokia.com/about-us/investors/corporate-governance/code-of-conduct)

#### **About Nokia**

We create the technology to connect the world. We develop and deliver the industry's only end-to-end portfolio of network equipment, software, services and licensing that is available globally. Our customers include communications service providers whose combined networks support 6.1 billion subscriptions, as well as enterprises in the private and public sector that use our network portfolio to increase productivity and enrich lives.

Through our research teams, including the world-renowned Nokia Bell Labs, we are leading the world to adopt end-to-end 5G networks that are faster, more secure and capable of revolutionizing lives, economies and societies. Nokia adheres to the highest ethical business standards as we create technology with social purpose, quality and integrity.

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