# Modern Slavery statement 2023



Slavery, servitude, forced labor, and human trafficking remain global concerns, and no industry or company can be considered immune to the different forms of modern slavery. Nokia does not tolerate, in any form or context, the use of servitude, forced or bonded labor, human trafficking, or other forms of modern slavery in any part of its global supply chain.

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## Mapping our business and supply chain

### 1.1 Nokia Business profile

At Nokia<sup>1</sup>, we create technology that helps the world act together. As a B2B technology innovation leader, we are pioneering a future where networks meet cloud to realize the full potential of digital in every industry. In addition, we create value with intellectual property and long-term research, led by the award-winning Nokia Bell Labs. We have built industry-leading patents, and technology programs.

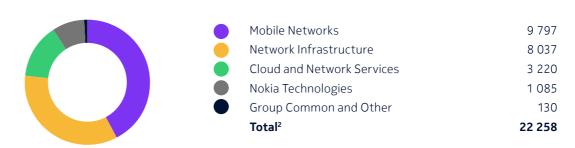
Customers and business partners worldwide trust Nokia to deliver secure, reliable, and sustainable networks today – and work with us to create the digital services and applications of the future.

Our main customers are communication service providers. We also provide solutions to a growing number of enterprises in the private and public sector that use our network portfolio to increase productivity, efficiency, and sustainability. We have four core business groups: Network Infrastructure, Mobile Networks, Cloud and Network Services, and Nokia Technologies. For more information see our **financial reporting.** 

Nokia employees work in R&D, in the production, deployment and maintenance of network hardware and infrastructure, or in corporate roles, including sales, legal, finance or other business support functions.

This Statement focuses on our supply chain where we see the greatest potential risk of forced or bonded labor or other forms of modern slavery. We consider the risk of encountering modern slavery in Nokia's own operations as highly unlikely.

### Net sales by business 2023, EURm



The figures are derived from our consolidated financial statements prepared in accordance with IFRS. Year-on-year change is in parenthesis.

### Net sales by region 2023, EURm



<sup>&</sup>lt;sup>3</sup> All Nokia Technologies IPR and Licensing net sales are allocated to Finland.

<sup>1</sup> For the purposes of this statement, "Nokia" refers to Nokia Corporation, a company incorporated under the laws of the Republic of Finland, with its headquarters at Karakaari 7, FI-02610 Espoo, Finland, and its subsidiaries. This includes, for various jurisdictions, the legal entities listed on the last page of this statement

<sup>&</sup>lt;sup>2</sup> Net sales include businesses and exclude "Eliminations and unallocated items".



### 1.2 Nokia supply chain profile

#### Identifying the part of supply chain most at risk

In 2023, we conducted business with around 10 000 suppliers, and 80% of our total supplier spend was with approximately 300 suppliers around the world. Our suppliers fall into seven broad categories:

- Component suppliers
- Final assembly suppliers
- IT hardware, software, and services suppliers
- Logistics and transport services suppliers
- Managed services suppliers around Nokia's networks
- Regional and local service suppliers supporting the delivery of services at customer sites
- Suppliers delivering goods and services required to run Nokia's operations

Our manufacturing (final assembly and hardware) suppliers are mainly based in Asia, whereas our service suppliers are located around the world.

We continue to work with Verisk Maplecroft, a global risk analytics company, for an independent view of the potential risks of modern slavery globally. In 2023, we again published an updated supplier list including Nokia's contract manufacturers, strategic original design manufacturers (ODMs) and component suppliers. The listed suppliers accounted for approximately 50% of our spend in 2023 for the manufacturing and/or production of our products. The Nokia Supplier List is available on our **website**.

### Risk assessment of our supplier profiles

Products/services category	Explanation	Modern Slavery Risk (based on workforce skill level, risk of informal employment, etc.)
Market support services	Includes site installation and construction, managed services, technical support services, and external workforce services.	High
Indirect sourcing	Includes tax, consulting, financial, legal, marketing, business process outsourcing (BPO), business services, training, HR operations and benefits, health and safety, travel and fleet, and events services.	Low
Electromechanics & RF accessories	Includes cable and connector assembly, printed circuit boards (PCBs), power systems, RF filters, metals, and subracks.	High
Manufacturing & delivery	Includes final assembly, original design manufacturer (ODM), repair and spares, logistics, warehousing, test equipment, and IT hardware. Includes vertical market solutions and incubation, original equipment manufacturer (OEM) software solutions, and platforms.	Medium
Optical components	Includes optical active discretes, optical passives, and optical transceivers.	Medium
Semiconductors	Includes semiconductors.	Low
Standard components	Includes analog and standard components, RF and timing, and computational components.	Medium
IT hardware, software, & services	Includes IT hardware, IT infrastructure and security, enterprise applications, software, and Software-as-a-Service (SaaS), and IT consulting and telecom services: mobile voice, fixed voice, wide area networks (WAN), and data.	Low

## Our Code of Conduct and related policies

We are committed to upholding the laws and regulations in all countries where we operate. Our **Code of Conduct** sets forth the key principles, values and standards that all our employees are expected to follow. We support, maintain, and constantly improve our employees' knowledge of compliance with the Code of Conduct through training, and we communicate regularly on its importance. We also ask our suppliers to follow requirements similar to those included in our Code of Conduct, and which are documented in our Third-Party Code of Conduct.

We offer multiple channels to report ethical concerns, including a dedicated email address, an online portal, and country-specific phone numbers. Our Nokia Ethics Helpline allows for anonymous reporting and is open to employees and external stakeholders. We respond to and investigate all concerns promptly, and establish remediation plans as needed.

Our Code of Conduct is the basis for our labor conditions and is underpinned by our Global People Framework along with local employment laws, policies, and practices. We adhere to the United Nations Universal Declaration of Human Rights and the United Nations Global Compact. Wherever we operate we strive to exceed the requirements of labor laws and regulations.

We are aligned with key elements of the social accountability standard SA8000. Our **policies**, standard operating procedures (SOPs), and Code of Conduct are applicable to our employees as well as our suppliers. As a member of the Responsible Business Alliance (RBA) we expect our suppliers to comply with the **RBA Code of Conduct**.

#### Our policies and SOPs cover:

- Child labor avoidance
- Forced labor avoidance
- Freedom of association and collective bargaining
- Worker-management communication
- Non-discrimination

- Humane treatment
- Working time
- Disciplinary practices
- Compensation
- Occupational health and safety

### 2.1 Purchasing practices

Our sustainability materiality analysis and enterprise risk management procedures help identify potential supply chain risks. We carry out more in-depth analyses to determine all supply chain risks via our dedicated Supplier Sustainability Risk Dashboard. The outcomes are included in our purchasing category strategies related to type and size of supplier, in addition to our monitoring- and performance- related requirements. We review category strategies annually with our purchasing category leads, as well as supplier location and business context. This approach helps ensure responsible purchasing practices across the company.

We conduct regular assessments with our suppliers to help them understand and meet our ethical standards and identify areas of improvement as needed. Our general audit covers the full set of supplier requirements, including corporate responsibility requirements, and is often used with new suppliers located in high-risk countries or suppliers where there has been significant change in business scope or location.

#### 2.2 Zero tolerance for child and forced labor

We have zero tolerance and strictly forbid any form of child labor and all forms of forced, bonded or imprisoned labor in both our own operations and our supply chain.

## 2.3 Freedom of association and collective bargaining

We respect the right to collective bargaining and freedom of association. Collective bargaining agreements are local, and in most countries where we have these agreements, the fundamental terms and conditions of employment are the same whether employees have chosen to be members of a union or not. 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 dialog with employees and/or their representatives.

### 2.4 Human Rights Policy and other policies

Nokia believes that connectivity and the technologies we provide are a social good that can support human rights by enabling free expression, access to information, exchange of ideas, and economic development.

Our **Human Rights Policy** addresses our most salient risks related to the potential misuse of the technology we provide. Policies related to other human rights – for example those related to fair labor practices, modern slavery and human trafficking, and environmental stewardship – are reflected in other Nokia policies, which can be found **here**.

Nokia's approach is inspired by the values and principles included in international human rights frameworks, such as the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and its related covenants), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and its core labor standards, the OECD's Guidelines for Multinational Enterprises, and is aligned with the United Nations' Guiding Principles on Business and Human Rights.

As stated earlier, we have zero tolerance and strictly forbid any form of child labor and all forms of forced, bonded or imprisoned labor in both our own operations and 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. In our recruitment, retention, promotion, and other employment activities, we are committed to complying with the applicable employment and labor laws and regulations wherever we do business, including wages and hours, privacy, immigration, compulsory and child labor, collective bargaining, anti-discrimination, working time and similar employment rules.

For Nokia, inclusion and diversity are important, as well as a platform for greater innovation, superior organizational performance, and customer service excellence. As a large, multinational company, we naturally have a diverse workforce. We strive to diversify Nokia's talent pool, and aim to increase the share of female employees to 25% by the end of 2030. To support this long-term target, we aim to maintain a minimum target of female hires in global external recruits every year. In 2023, we exceeded this minimum ambition of 27% by hiring 28% female hires during the year. Creating a culture of inclusion is vital to Nokia. We gather feedback from our employees through our Annual Employee Survey and ensure that we take necessary action to further improve the Nokia employee inclusion experience.

## Due diligence and training

We require our suppliers to uphold Nokia's policies and share the overall values expressed in our Third-Party Code of Conduct without any obstruction or discouragement. To demonstrate their commitment to respecting human rights and ethical business conduct, we expect our suppliers to have relevant management systems and resources in place, as well as, a company code of conduct. We also expect our suppliers to apply the same standards to their own suppliers. We conduct regular, robust assessments with our supplier network to support them in meeting our ethical standards and improving performance where necessary.

We use a range of methods to monitor our suppliers. We have been a member of the RBA since 2021, and we have adopted the **RBA Code of Conduct** requirements for suppliers. Nokia's supplier requirements, which include the RBA Code of Conduct, are part of our contractual supplier obligations covering social, ethical, and environmental issues. An overview of these requirements can be found on our **website**. We expect our tier 1 suppliers (this includes both our final assembly suppliers and our materials and services suppliers) to apply and cascade these to their own suppliers, which we aim to check through audits and assessments.

Our supplier requirements are also regularly reviewed based on evolving industry standards such as SA8000, or in relation to the codes of organizations such as the **RBA** and the **Joint Audit Cooperation (JAC)**.

We use **EcoVadis** sustainability assessments with a tailored questionnaire and supporting document reviews to assess the environmental, labor, health, safety, ethics, and sustainable procurement management systems of our suppliers. Responses are scored by an independent analyst.

We conduct in-depth corporate responsibility audits covering labor conditions and environmental management for our existing suppliers. Implementation of these audits is aligned with the SA8000 methodology, and 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 we expect and require our suppliers to audit their next-tier suppliers.

Nokia corporate responsibility auditors are trained through a Social Accountability International (SAI) auditor training on the SA8000 standard which provides guidance on how to recognize issues. Experienced auditors further train new auditors and share knowledge and experience across the teams.

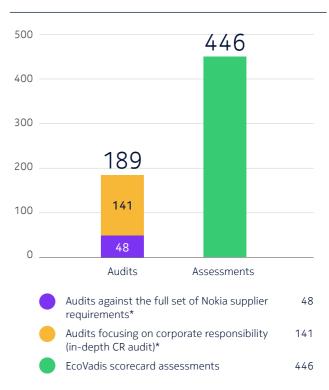
## Due diligence and training

In 2023, we conducted a total of 635 supplier audits and EcoVadis assessments, of which 141 were in-depth corporate responsibility audits of 71 suppliers and 446 were online assessments with EcoVadis on labor, safety, and environmental elements. The number of audits significantly increased compared to 2022 as COVID-related restrictions were removed. There were 18 countries covered by these audits including China, Hungary, India, Malaysia, Mexico, Morocco, Taiwan, the Philippines, and Vietnam.

We report publicly on the types and numbers of findings from these audits in our annual **People & Planet sustainability report**. Examples of audit findings and corrective actions taken can be viewed **online**. We also continued the monthly monitoring of working hours, days -off, and contractual labor usage on a factory level for our key final assembly suppliers. Our performance, which we report annually against set KPIs, is summarized in the table below for 2023, with more details available in our People & Planet report:

KPI	Nokia People & Planet report 2023 – page number.
Corporate sustainability audits and assessments in 2023	p.60
Suppliers participating in sustainability workshops and webinars	p.60

## Supply chain audits and assessments conducted in 2023



<sup>\*127</sup> of our supplier audits were conducted through our customers' Joint Audit Cooperation (JAC) framework or through Responsible Business Alliance (RBA) Validated Assessment Program (VAP) audits.

## 3.1 Driving improvement through training and capability building

While we conduct assessments to ensure compliance, we realize these are not sufficient to drive continuous improvement and competence development on sustainability. By improving our 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.

In 2023, we continued to develop supplier capabilities around issues found in audits through supplier workshops. In total we ran 12 supplier training workshops and webinars on subjects such as modern slavery, labor migration and ethical recruitment, inclusion and diversity, responsible minerals sourcing, climate change, circular practices and health and safety.

We build the required capacity by first training our own procurement teams who then participate in supplier training. We also conduct mandatory Ethical Business Training for all employees and require them to acknowledge the Nokia Code of Conduct. In 2023, our Ethical Business Training was completed by 98% of our employees.

In 2023, Nokia conducted an online seminar on "Child Labor and Young Workers in Global Supply Chains" with UNICEF Finland, providing Nokia employees working with suppliers a better understanding of the challenges involved and need to work vigilantly to mitigate child labor risks. The webinar also covered how Nokia remediates child labor if found and established control points.

In addition to our own programs and assessments, we are part of industry coalitions such as the RBA, and work to improve the corporate responsibility of our global supply chains. We contribute to RBA workstreams focused on various supply chain topics.

## 3.2 In-depth training and guidance for on-site personnel

As a key component of our sustainability approach to our supply chain, we carefully track working conditions. We place special emphasis on health and safety as part of our supply chain includes equipment installation and maintenance contractors who spend much of their time working at height, or driving long distances.

Ensuring that everyone is authorized, has the appropriate competences and is fit to work is a key control measure in enabling on-site work to be done safely. This is supported by

our health and safety control procedures, which address the supplier's management capability upon initial engagement, enable reviews of procedures they have in place when they start working on a project and monitor compliance through on-site inspections. We have a mature and established global reporting and investigation process for incidents, which includes any suspected instances of child, forced, or bonded labor and other forms of modern slavery.

#### The risk of mistreatment of minorities and modern slavery

Modern slavery and forced labor remain a challenge for countries and supply chains. In 2023, we took an in-depth look into child and young labor risks and revised our internal Child Labor, Prohibited Labor by Young Workers, and Forced Labor Remediation Guidelines. This followed our prior analysis of labor migration and its impact on our supply chain.

We have robust supplier 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, ethical recruitment and inclusion and diversity. In 2023, we conducted training for our employees on child rights in the supply chain. Our work also includes advocating for greater dialog on non-discrimination of ethnic and other minorities.

### 3.3 Finding a solution to conflict minerals

A key area of our work with our supply chain is the ongoing identification and mitigation of potential risks in the mining, extraction, and trade of metals that provide key minerals for electronic components. Risks include military conflict, human and labor rights violations, and damaging impacts to the environment. The traceability of our materials and ensuring our products are conflict-free is a priority, as reflected in our **Responsible Minerals Policy**.

We aim to contribute to a long-term solution to the issue of conflict minerals that ensures responsible and conflict-free sourcing via legitimate trade and brings sustainable improvements in the countries where the risks are greatest. We require that our suppliers commit to sourcing materials from environmentally and socially responsible sources. Materials that either directly or indirectly contribute to conflict are unacceptable.

As part of our work to ensure conflict-free minerals we collaborate with industry peers through the Responsible Minerals Initiative and the Public-Private Alliance for Responsible Minerals Trade. In 2023, 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 Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals.

We also encourage suppliers to participate in the Responsible Minerals Assurance Process (RMAP) audit to underscore and validate their status as a conflict-free supplier. In 2023, we achieved a 68% validation level. A further 12% of smelters can reasonably be considered as conflict-free based on our due diligence efforts.

We have asked our suppliers to phase out those smelters that were not part of the industry assurance program, nor evaluated as low-risk. Engagement with such smelters over recent years has not motivated them to collaborate, and therefore we feel there is a high likelihood they are engaged in potentially non-compliant practices. Thus, phase-out of such smelters is the only acceptable alternative for Nokia.

We also undertook due diligence for cobalt and mica in our components based on extended minerals material declarations for product parts. We engaged with 65 relevant suppliers about our requirements regarding cobalt and requested they exercise due diligence over the cobalt supply chain, with 17 suppliers also engaged in due diligence over the mica. As a result, we identified 78 cobalt and 11 mica smelters in our cobalt supply chain, out of which 59% (cobalt) and 27% (mica) have gone through the Responsible Minerals Assurance Process (RMAP) and qualified for either "Conformant" or "Active" status.

For upstream engagement we continued our work with the Public-Private Alliance for Responsible Minerals Trade and contributed to the development of in-region programs.

### 3.4 Enhancement of procurement processes

We regularly evaluate the performance of our suppliers through multiple sustainability monitoring programs including on-site audits, CDP (carbon disclosure) and EcoVadis assessments, health and safety Supplier Maturity Assessments and the Conflict Minerals Program – which all contribute to our sustainability pillar in our supplier performance evaluation. In our category strategies, we set performance requirements for suppliers to achieve or maintain 'Preferred' and/or 'Allowed' status across performance categories. Suppliers that do not meet performance requirements are downgraded.

## Reporting concerns and speak-up culture

We offer multiple channels for our internal and external stakeholders to report ethical concerns or suspected violations of the stated policies. Our speak-up culture is designed to ensure that employees feel comfortable raising ethics and compliance concerns without fear of retaliation.

Nokia has zero tolerance for retaliation against any employee or contractor who raises a concern in good faith or provides evidence in support of such a concern. The Nokia Ethics Helpline is operated by a third-party provider, CaselQ. Reports and conversations are confidential, and those reporting concerns may remain anonymous if they wish. In 2023, a total of 1 056 concerns were raised through the Nokia Ethics Helpline reporting channels, of which 71 were related to working with suppliers.

More information on grievances and the investigations carried out can be found on page 84 in our **People & Planet sustainability report** and through our **website**.

### **Helpline information**

Email: ethics@nokia.com

**Phone:** https://nokiacms.i-sight.com/

portal/dialing-instructions

Website: https://nokiacms.i-sight.com/portal

### Activities in 2023

### 5.1 Increasing supply chain transparency

As a global company with operations around the world, we strive for increased transparency in all areas of sustainability reporting. In March 2024 we published our **People & Planet sustainability report** for 2023, in which we again reported findings from our in-depth corporate responsibility supplier audits

In 2023, our audits uncovered 48 cases related to non-compliance or the potential risk of forced labor.

A few cases concerned missing or inadequate documentation, such as missing contracts or appointment letters or content in the contract such as salary, working hours, leave and benefit entitlements, and termination conditions. Most of these findings were addressed and closed, but a few are still in process and yet to be closed in 2024.

Fifteen (or one-third) of the cases concerned the recruitment process and associated costs, such as medical examinations, employee uniforms or travel. These costs were initially borne by the migrant laborer in their home countries and compensated only upon arrival in the destination country or as part of their first salary, or not compensated at all. This delay increases the potential risk of bonding (bonded labor).

In a few cases, companies had recruitment and no-fees policies in place but did not have controls in place to ensure

such activities did not occur. These findings were addressed by setting up a process where fees are to be paid directly by the supplier or labor agency and not by the worker. Nokia also highlighted the lessons learned from such cases in our ethical recruitment webinar conducted for suppliers.

Six of the cases concerned deductions that were withheld from the base salaries and were related to for example wornout PPE (personal protective equipment), training provided by a third party or personal loan facilities. Suppliers are implementing corrective actions as we have no tolerance for such deductions from basic wages.

Another five cases concerned excessive employment of dispatched workers while the legal cap in the country remained at 10%.

There was also an instance of non-coercive restrictive systems or procedures where an off-position card was required if employees wanted to leave their post to drink water or use the bathroom during working time with an allowed time of less than 10 minutes.

We also uncovered six instances of potential risk or nonconformity related to child and young labor protection in 2023. Three of the cases were related to missing evidence of a copy of proof-of-age at the time of audit, although all the workers were of the legal minimum employment age. Two of the cases were about internship policies and procedures. In one case the percentage of student workers exceeded the allowed limit of 10%, and in the other case, the company internship policy did not state the minimum requirements to protect interns from being exploited and used to fill a labor shortage rather than complementing their studies. And in the last case there was no special protection provided to a young worker (restriction on overtime and night shift work or health examination conducted).

The suppliers took the required corrective actions by developing missing policies and procedures for internships and young worker protection as well as providing and including proof-of-age checks in their worker documentation.

Nokia continues to assess opportunities to improve our processes and supplier engagement efforts so that any potential lessons learned can be fully integrated into our future ways of working.

### Activities in 2023

#### Tracking and follow-up

We continue to report against our long-term ESG targets, provide examples of corrective actions and KPIs in our **People & Planet sustainability report** and **website**, and follow up on issues mentioned above to check continued adherence.

Suppliers failing to address audit findings within six months negatively affects their performance evaluation, as their audit score is lowered. Supply chain workers are engaged through worker interviews during corporate responsibility audits to ensure their voice is included, and Nokia Ethical Helpline channels are open for all individuals and stakeholders to flag concerns, including our suppliers' employees.

We disclose examples of our findings from our in-depth corporate responsibility supplier audits on page 60 of our 2023 People & Planet sustainability report **here**. The number of grievances from suppliers is reported in the business conduct section of the report with commentary on page 84.

### 5.2 Collaboration and looking forward

In 2023, we continued our collaboration with a number of key organizations that focus on corporate responsibility in global supply chains. As a member of the RBA, we participated in workstreams covering labor rights and environmental issues.

We also continued our collaboration with the Joint Audit Cooperation (JAC). This is an association of telecommunications operators (our customers) that aims to verify, assess, and develop corporate responsibility implementation across the manufacturing centers of multinational suppliers of the ICT sector. The membership of JAC increased in 2023 and now includes 27 of the world's telecom operators. JAC members share resources and best practices to develop long-term sustainability and corporate responsibility implementation in the different layers or tiers of the global ICT supply chain. In 2023, we conducted 189 supplier audits, 127 of which were conducted through either the RBA Validated Assessment Program (VAP) audits or the JAC framework.

As part of our commitment to respecting human rights, we continue to be an active member of the multi-stakeholder Global Network Initiative (GNI), which examines human rights in the ICT sector and involve leading companies, investors, academics, and civil society groups. Companies participating are independently assessed every two to three years on their GNI commitments. This independent assessment is carried out by a GNI-accredited external assessor. Nokia was the

first telecommunications equipment vendor to successfully complete a GNI assessment in 2019. We successfully completed our second independent assessment for the GNI, with the public report made available in 2023. In particular, the assessors highlighted Nokia's strong human rights culture, noting that many issues were flagged and addressed informally even prior to surfacing during the formal process. They also praised our robust human rights due diligence process, which encompasses relevant functions across the company with strong escalation mechanisms.

We aim to keep our robust systems, processes, and procedures at the current high standard, while seeking to continually improve our ways of working and driving for increased vigilance. We will also continue to drive dialog on modern slavery and human rights in the supply chain and encourage our main suppliers to recognize and act on the challenges of modern slavery.

This Statement covers the financial year of 2023.

#### Pekka Lundmark,

President and CEO Nokia Group

## Attestation and other legal mentions

This Statement applies to Nokia Corporation and its subsidiaries and is designed to meet Nokia's reporting obligations under various acts in several jurisdictions, as listed below.

#### Canada

This statement is designed to meet Nokia's reporting obligation under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. Nokia provides this statement on behalf of Nokia Solutions and Networks Oy and Nokia Canada Inc. For the purpose of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. Nokia Canada Inc and Nokia Solutions and Networks Oy are considered an 'entity' under the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act and make this statement as a single statement pursuant to section 11. For the purpose of the relevant approval and signing requirements, this modern slavery statement has been approved by the governing body of Nokia Solutions and Networks Oy and has been signed by a director. Nokia Canada's board and senior management are aware of the content of this global Statement and are aligned with its contents.

### The United Kingdom

The following Nokia affiliates must report for the purposes of the United Kingdom's Modern Slavery Act 2015: Nokia UK Limited; Nokia Solutions and Networks Oy and Alcatel Submarine Networks UK Limited.

#### Australia

Under the Modern Slavery Act 2018 (Cth) and NSW Modern Slavery Act 2018 (NSW Act), the reporting entity for the purposes of this Statement in Australia is Nokia Solutions and Networks Australia Pty Limited. This Australian entity is a fully integrated entity within the Nokia global group and aligns with all Nokia's global policies and practices.

During the preparation stage of this Statement, a representative of the Board of Directors of Nokia Solutions and Networks Australia Pty Limited was consulted and given the opportunity to input and ensure that the modern slavery risks relating to NSN Australia (if any) were appropriately identified, assessed, and addressed. NSN Australia's board and senior management are aware of the content of this global Statement and are aligned with its contents.

Nokia and its subsidiaries share the same core business operations and supply chains, policies prohibiting modern slavery, and supporting processes described above in this statement. The above statement covers Nokia's fiscal year ended on December 31, 2023 ("FY2023").

The Board of Directors of Nokia Solutions and Networks Oy, for itself and the Nokia affiliates listed in this note approved this Statement on 28th May 2024. Tommi Uitto, Chairman, Nokia Solutions and Networks Oy.

Nokia is a registered trademark of Nokia Corporation. Other product and company names mentioned herein may be trademarks or trade names of their respective owners.

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#### **About Nokia**

At Nokia, we create technology that helps the world act together.

As a B2B technology innovation leader, we are pioneering networks that sense, think and act by leveraging our work across mobile, fixed and cloud networks. In addition, we create value with intellectual property and long-term research, led by the award-winning Nokia Bell Labs.

Customers and business partners worldwide trust Nokia to deliver secure, reliable and sustainable networks today – and work with us to create the digital services and applications of the future.

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