



## Nokia Third-Party Code of Conduct

Business is all about trust. Trust is built on integrity.  
Your decisions matter.

# NOKIA

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# Introduction

## Nokia values

Nokia takes pride in its reputation for integrity, carefully built over more than 150 years. This reputation remains strong because everyone acting on the company's behalf – employees, directors, partners, and Third Parties – is expected to comply with laws, regulations and company policies and to uphold the company's values. And no value is more important than integrity. We believe that to stay competitive in the market, a reputation for integrity is an asset that not only enhances our combined value but also contributes to our individual success and growth in the long run. Business is all about trust and trust is built on integrity.

## Applicability of this code

This Third-Party Code of Conduct sets forth Nokia's expectations of its Third Parties and is based on the values and principles set forth in Nokia's Code of Conduct, available on our website at the following link. <https://nokia.com/about-us/code-of-conduct/>

We require that all Nokia Third Parties\* understand and live our values and embrace the same high ethical standards of business conduct that has long been our hallmark. Among other things, this means that all Nokia Third Parties are required to comply with all applicable laws and regulations, wherever they do business. We expect Nokia Third Parties to ensure that the principles set out in this Code are implemented and communicated throughout their organization, making it available to its employees and to those sub-third parties that work on behalf of Nokia. Third Parties are also required to desist or cease to work with any sub-third party that has not been approved by Nokia or allowed under Nokia Policies; for example, Nokia Policies strictly prohibit the use of commercial (sales) agents. Please refer to contractual documents for further clarity on this.

\*For the purposes of this document, the term Third Parties includes, but is not limited to: distributors, direct or indirect resellers, value added partners, consultants, licensees, suppliers and others as may be prescribed from time to time (hereafter referred to collectively as "Third Parties").



Nokia is committed to doing business with integrity and in compliance with the highest international standards and, therefore, when conducting business with, or on behalf of Nokia, Third Parties are expected to apply and comply with the following obligations.

# 1.0 Legal and regulatory compliance

## 1.1 Anti-corruption

Corruption can take many forms, but most often occurs through bribery, which is the offering, giving, or accepting of anything of value for the purpose of gaining or keeping business or otherwise securing an improper advantage. “Anything of value” is defined broadly and may include cash, cash equivalents, excessive/lavish gifts, meals, travel, entertainment or excessive discounts that may be used to create slush funds for improper purposes.

Nokia does not tolerate bribes, kickbacks or extortion of any kind. Facilitation payments, sometimes called “grease payments,” are also prohibited. Always comply with all applicable local and international anti-corruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act, U.K. Bribery Act and the French Anti-Corruption Law (Sapin II). Be extra cautious when interacting with government officials. Avoid taking any actions that could be perceived as seeking an unfair business advantage, and never seek improperly to influence any action or decision. When working with third parties in connection with Nokia business, take appropriate steps to ensure they follow similar values and principles and do not engage in improper or illegal conduct.

## 1.2 Trade compliance

Comply with all applicable trade compliance laws and regulations, including export controls and international sanctions. Work only with and through reputable customs agents. Ensure that all valuations, declarations, and documents pertaining to trade and customs matters are accurate and complete.

## 1.3 Insider Trading

Ensure that all confidential or non-public information obtained in relation to Nokia is used only for lawful purposes and solely for the purpose(s) for which it was obtained. Such information should not be used for the personal benefit of any employee or individual. Never trade shares based on insider information or encourage anybody to trade shares based on insider information.

## 1.4 Fair Competition / Anti-Trust

Abide by all applicable competition laws and regulations and ensure that bids for tenders are independent and fair. Do not discuss price-sensitive or otherwise competitively sensitive information with any competitors. Refrain from entering into any agreements that could restrict competition. Obtain information concerning competitors using only ethical means and lawful public sources.



## 1.5 Anti-money laundering and anti-facilitation of tax evasion

Follow international and local anti-money laundering laws, as well as laws concerning the facilitation of terrorism and tax evasion. Implement robust internal processes to ensure adherence to “Know Your Customer” laws and best practices. Take all the necessary steps to work only with reputable customers and to engage in business transactions only where the source of funds is known to be legitimate.

## 1.6 Data Privacy

Respect the privacy rights and interests of employees, partners, vendors and customers. Comply with all applicable laws and regulations while processing, transmitting or storing personal data. Ensure that all data is protected. In the event of any improper disclosure or breach of personal or sensitive data, notify Nokia without delay and as provided by applicable contractual and legal requirements. You should also take reasonable and legally required steps following such an event.

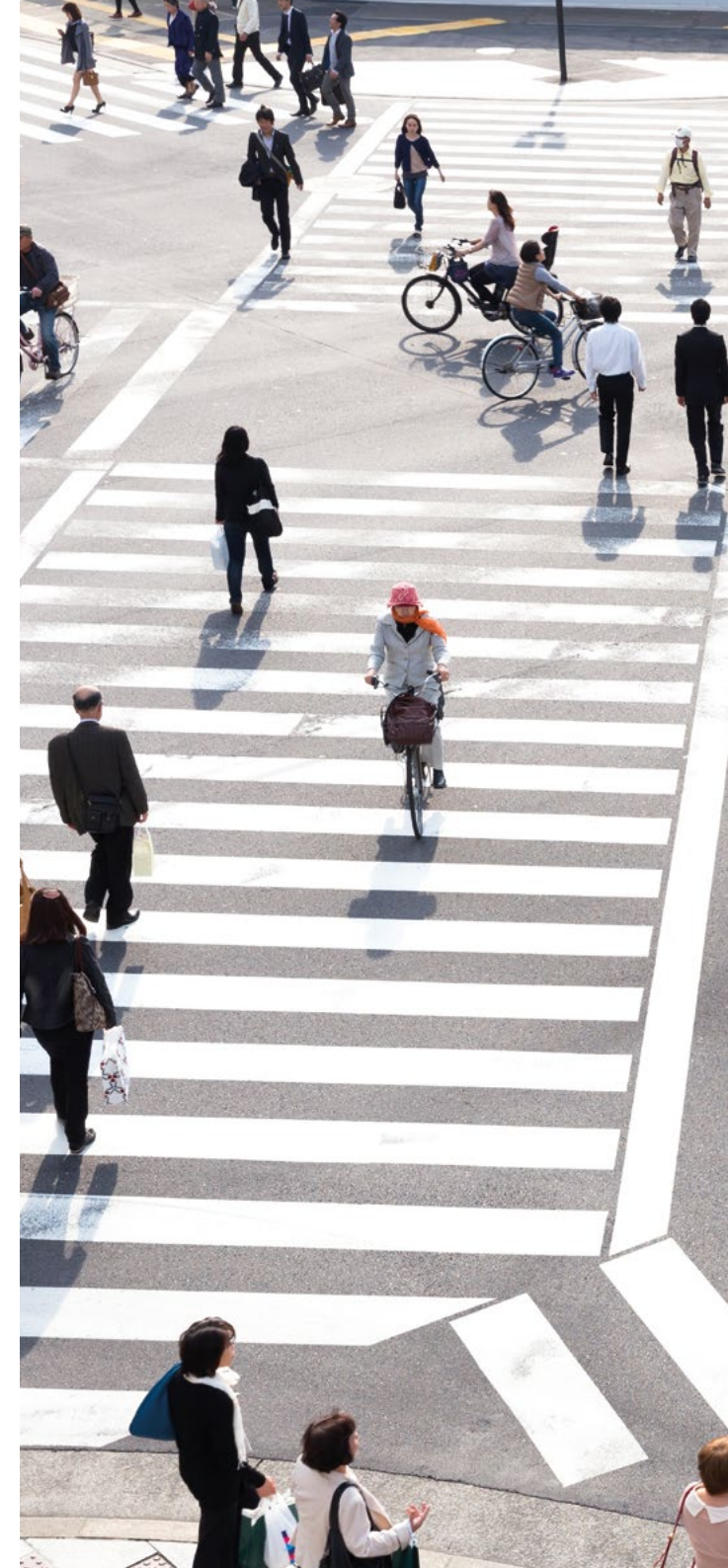
## 1.7 Intellectual Property and Confidential Information

Respect and protect Nokia’s intellectual property and confidential information and do not publish, use or disclose such information to any unauthorized third party. Use confidential information only for Nokia’s

legitimate business purposes and in line with Nokia’s information security policy, which also requires use of approved business communication platforms. Use the Nokia brand and trademark consistent with Nokia’s guidelines and only after Nokia’s express written consent. Protect and responsibly use Nokia assets and comply with our requirements for maintaining confidentiality and security of these assets (e.g., never download Nokia information on a personal device, removable storage media or personal email). Respect and protect any intellectual property and confidential information of others received for use by Nokia in accordance with the terms of any applicable agreement.

## 1.8 Cyber, Information & Product Security

Maintaining robust cyber, information and product security is a bedrock of Nokia’s commitment to our customers, employees and other stakeholders, and is present in all Nokia products and services. Adhere to this core value to help protect Nokia’s and our customers’ data, products, services, systems, and networks. Nokia has in place policies and security practices that align with industry standards, as well as comply with legal and regulatory requirements. Maintain similar cyber and information security measures in your supply chain.



# 2.0 Ethical business practices

## 2.1 Conflict of Interest

In any case where there is or may be an actual, potential, or perceived conflict of interest – that is, where the interests of Third Parties' board members, executives, officers, employees or agents may diverge from or conflict with those of Nokia – take responsibility to address the matter, which steps may include notification to Nokia in any instance where Nokia's interests may be impaired. Refrain from offering gifts and/or excessive hospitality to Nokia employees who may influence or be perceived to influence decision making.

## 2.2 Record Keeping

Maintain accurate, complete and reliable records of all transactions and expenses incurred for or on behalf of Nokia. All records should be maintained in a timely manner and in reasonable detail in accordance with applicable accounting principles, laws, and regulations. On request, provide Nokia with all relevant documentation, including transaction details, invoices and/or receipts regarding sales of any Nokia products or services.

## 2.3 Confidential Reporting

Provide for an open and confidential concern reporting framework, which allows personnel to raise concerns within its organization, without any fear of retaliation. Ensure that timely, objective, and thorough investigations are carried out for any compliance or integrity concerns, and that appropriate remediation is implemented, including disciplinary measures as may be appropriate, at the conclusion of an investigation.



# 3.0 Environmental and social regulations

## 3.1 Fair employment

Practice fair treatment of others. Do not engage in or support discrimination based on race, color, gender, language, religion, political or other opinion, national or social origin, property, sexual orientation, health status, age, disability or other distinguishing characteristics. Comply with all applicable laws and regulations concerning wages, hours and conditions of employment. Employment should be considered a matter of free will; forced labor, involuntary servitude, and child labor are prohibited.

## 3.2 Environment

Uphold Nokia's commitment to protect the environment and be responsible towards environmental issues and act accordingly; and comply with all applicable environmental laws and regulations, including keeping up-to-date registrations and permits. Work to ensure that your suppliers act similarly.

## 3.3 Health and Safety

Provide a safe and healthy working environment for all employees and take measures to prevent workplace fatalities, eliminate workplace injuries, and limit disease, including provision of appropriate personal protective equipment and training. Work to ensure that your suppliers act similarly.

## 3.4 Human Rights

Nokia is committed to respect and support the Human Rights principles and values laid out in 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 the United Nations Guiding Principles on Business and Human Rights. Nokia provides products and services that expand opportunities to communicate and contribute directly to the exercise of such fundamental rights as free expression, access to information, exchange of ideas, and right to privacy. Conduct business in accordance with all such principles and in compliance with all applicable global and local human rights laws and work to ensure that your suppliers act similarly.





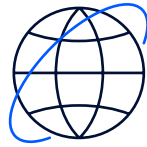
# 4.0 Responsibilities under this Code of Conduct as our Third Party

Contact a Nokia business representative and/or use one of the following channels to report a concern when:

- Any violation or attempted violation of law or of this Third-Party Code of Conduct is suspected
- Questions arise regarding this Third-Party Code of Conduct or about Nokia's expectations from Third Parties.

Violations reported will be kept confidential, to the maximum extent allowable, or unless required to be disclosed by law. Nokia will not retaliate against anyone, who reports, provides information or assists in the investigation process in good faith.

Third Parties are expected to provide reasonable assistance for any investigation matter, which may arise from a violation or suspected violation of this Third-Party Code of Conduct or international or local applicable laws. Third Parties are required to provide reasonable access to all records, facilities and documentation concerning the matter being investigated. This reporting information must be disseminated or otherwise made available to your employees and suppliers who support work and services related to Nokia.



## Online

Access Nokia's Ethics Helpline by clicking on the following link:

**<https://nokiaccms.i-sight.com/portal>**



## Phone

Access Ethics Helpline local calling numbers by clicking on the link below. Select from any of the available languages.

**<https://nokiaccms.i-sight.com/portal/dialing-instructions>**



## Email

Report a concern or ask a question related to compliance via email.

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



Nokia OYJ  
Karakaari 7  
02610 Espoo  
Finland

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

#### **About Nokia**

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

As a B2B technology innovation leader, we are pioneering the future where networks meet cloud to realize the full potential of digital in every industry.

Through networks that sense, think and act, we work with our customers and partners to create the digital services and applications of the future.

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