



Nokia Solutions and Networks GmbH & Co. KG

Rules of Procedure for Complaint and Notification Proceedings within the meaning of the LkSG

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For the sake of linguistic simplification, the designation of persons or groups of persons in this document refers to persons of any gender.

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Introduction

Nokia Solutions and Networks GmbH & Co. KG (hereinafter referred to as "Nokia Germany") has been obliged to comply with the requirements of the German Supply Chain Due Diligence Act (hereinafter referred to as "LkSG") since January 1, 2024. Nokia Deutschland is a group company of Nokia Oyj based in Finland. Among other things, the LkSG obliges Nokia Deutschland to implement certain requirements in connection with a complaint procedure within the meaning of the LkSG. Companies within the scope of application of the LkSG are obliged to offer whistleblowers inside and outside the company effective and accessible opportunities to raise complaints.

Nokia Germany fulfils this obligation with the help of a group-wide, transparent, public and barrier-free uniform complaint and reporting procedure.

Nokia Germany presents the functionality of the complaints procedure on the following pages.

Munich, 01.01.2024

Nokia Solutions and Networks GmbH & Co. KG

Management



1. Rules of Procedure for the Appeal and Notification Procedure

These Rules of Procedure serve to ensure compliance with the legal requirements of the LkSG with regard to the complaint and reporting procedure and to regulate the handling of complaints and information with regard to human rights and environmental risks as well as violations of human rights and environmental obligations. To ensure compliance with legal requirements and minimize potential negative impacts, appropriate and transparent treatment is essential. Nokia Deutschland ensures this through these rules of procedure.

2. Whistleblowers

Nokia Germany's complaint and reporting procedure is open to everyone. Complaints and information can therefore be submitted by employees as well as third parties as well as by organizations outside Nokia Germany.

3. Content of the message

In connection with Nokia Germany's business operations or the business operations of Nokia Germany's direct suppliers, any suspicion of an actual or potential violation of human rights or environmental obligations, as well as indications of environmental risks, may be reported.

4. Complaint channels

Nokia Germany has various reporting channels that can be used for complaints or information. All employees as well as all business partners of Nokia Germany and all third parties can use the Nokia Ethics Helpline for this purpose. This can be done through either a web portal (<https://nokiaccms.i-sight.com/portal>) or a call center (<https://nokiaccms.i-sight.com/portal/dialing-instructions>), both of which are available around the clock. Complaints and reports can also be sent by anyone to the Nokia Ethics (ethics@nokia.com) email account.

5. Competence

Complaints or reports will be handled by a central investigation department of Nokia Germany. The specially trained employees of the investigation department are impartial, not subject to instructions, are subject to a special duty of confidentiality and will discuss the facts of the case with you and, if necessary, offer a procedure for an amicable settlement.



6. Acknowledgement

If a complaint or report is received by Nokia Germany, the whistleblower will receive an acknowledgement of receipt from Nokia Germany within 7 days at the latest.

7. Processing

Nokia Germany takes any complaints or reports very seriously. The Legal and Compliance Department will promptly review the complaint or report and will promptly take appropriate steps to clarify the reported matter and, where necessary, take corrective action. If necessary, Nokia Germany will contact the whistleblower to clarify possible open questions or to request further information on the clarification of the facts. If the LkSG obliges Nokia Germany to do so, Nokia Germany will discuss the complaint or the report with the whistleblower.

8. Measures

As soon as the incoming examination of the complaint or report has been completed, the investigation of the facts begins. As part of this, an examiner can be instructed, for example, to investigate the complaint or report. Auditors can be assisted by experts if necessary to understand the underlying issue of the complaint or report as fully as possible.

If, at the end of an investigation, it becomes apparent that an employee or a third party cooperating with Nokia Germany has violated applicable law or the Nokia Germany internal guidelines relevant to the LkSG, remedial measures within the meaning of the LkSG and disciplinary measures may be taken against the employee, among other things.

Nokia Germany shall, to the extent permitted and possible, provide the whistleblower with information on any measures taken within 3 months.

9. Prohibition of disciplinary measures

Whistleblowers who file complaints or reports with Nokia Germany in good faith are protected against reprimand by Nokia Germany. Whistleblowers who believe that they or others have been affected by prohibited disciplinary action, or that they have been discriminated against as a result of a complaint, are requested to inform Nokia Germany immediately. The complaint channels listed above under No.4 are indicated. Nokia Germany investigates all conclusive allegations of discrimination. If the allegations turn out to be true, Nokia Germany treats the process as its own compliance violation and takes appropriate measures.



10. Confidentiality of complaints and reports

Complaints and reports can be reported anonymously to the Ethics Helpline. They can be submitted anonymously. In this case, whistleblowers do not have to provide names or other information that can identify them. Nokia Germany respects the decision to report anonymously. In order to enable communication with whistleblowers even after anonymous reports, Nokia Germany communicates with whistleblowers via the Ethics Helpline web portal. This communication is possible without the identity of the whistleblower being revealed. However, the whistleblowers should provide sufficient information on the facts of the case so that Nokia Germany can adequately investigate the complaint or report. Reports and complaints for which insufficient information is provided and/or for which communication with the reporting person to clarify questions is not possible may not be processed.

11. Processing of personal data

The processing of personal data may be necessary to process complaints and reports. The General Data Protection Declaration, which is published under https://www.nokia.com/de_int/privacy/notices/general/, applies to this purpose. The controller is Nokia Germany.
