

# Nokia Oyj

**TICKER**  
HEL:NOKIA

**MARKET CAPITALIZATION**  
US\$27 billion

**HEADQUARTERS**  
Finland

**DISCLOSURES**  
UK Modern Slavery Act: Yes

**TARGETS**  
Yes

California Transparency in Supply Chains Act: Not available

## OVERALL RANKING

**13 out of 49**

([2018 Rank](#): 13 out of 40)

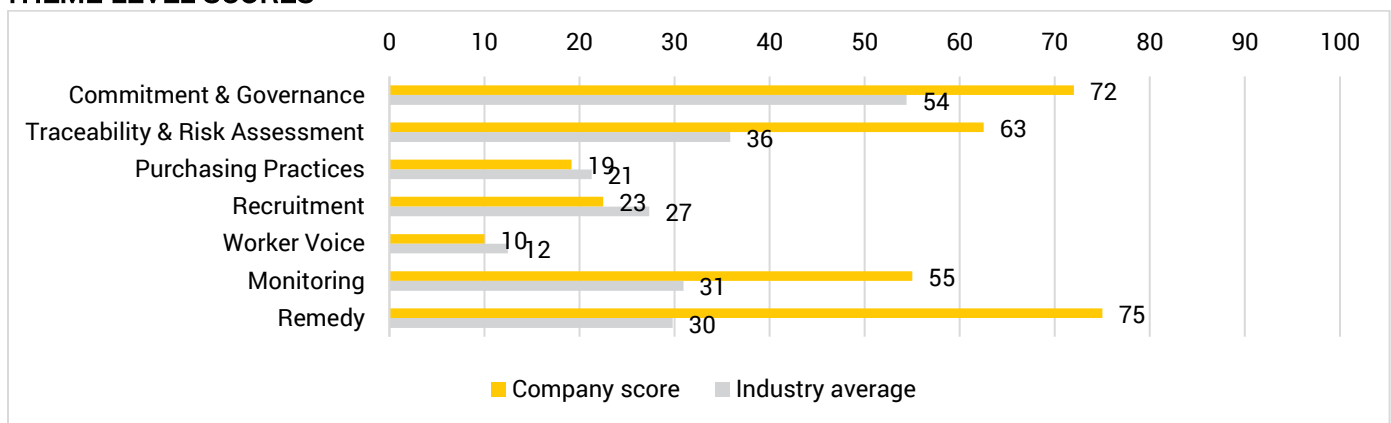
## OVERALL SCORE

**45 out of 100**

## SUMMARY

Nokia Oyj (Nokia) ranks 13<sup>th</sup> out of 49 companies, disclosing more information on its forced labor policies and practices than its peers on all themes except Purchasing Practices, Recruitment, and Worker Voice. Compared to 2018, the company's score improved by seven points. This is because the company began disclosing information on its responsible sourcing team and their management of supply chain policies addressing forced labor, engagement in multi-stakeholder initiatives on forced labor, a policy prohibiting passport retention, lower-tier supplier monitoring, and remedy outcomes for supply chain workers. The company is encouraged to improve its performance and disclosure on the themes of Purchasing Practices, Recruitment, and Worker Voice.

## THEME-LEVEL SCORES



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#). It includes an [allegation in the company's supply chains regarding forced labor of ethnic minorities transferred from Xinjiang to factories across other provinces in China](#), which falls outside of the research timeframe.

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**KEY DATA POINTS****SUPPLIER LIST**

No

**NO-FEE POLICY**

Yes

**AVERAGE SUPPLIER SCORE**

28/100

**REMEDY FOR SUPPLY CHAINS WORKERS**

Yes

**HIGH-RISK SOURCING COUNTRIES**China, Malaysia<sup>1</sup>

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**LEADING PRACTICES**

**Training:** Nokia discloses that it has conducted 11 training workshops for suppliers in high-risk locations, including Cameroon, China, Colombia, India, Malaysia, Mali, Mexico, Myanmar, Peru, Senegal, and Togo. The company also publishes a map showing where it has carried out on-site audits and held workshops that address modern slavery.

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**NOTABLE FINDINGS**

**Stakeholder Engagement:** Nokia reports that it has established a multi-stakeholder coalition, “Tech Against Trafficking,” to identify how technology can be used to combat human trafficking in supply chains. The coalition includes ICT companies, civil society organizations, and the United Nations.

**Monitoring:** Nokia discloses that its audits, which include assessments of forced labor risks and incorporate off-site interviews with workers, cover its first- and second-tier suppliers. It states that it expects its suppliers to carry out audits of the next tier of suppliers. The company discloses the percentage of suppliers audited and the audit findings, categorized thusly: child labor, forced labor, freedom of association, discrimination, working hours, and remuneration.

**Remedy:** Nokia discloses details on its corrective action plan process with its suppliers (e.g., how it verifies remediation and details the potential consequences for suppliers who do not take corrective actions). It also discloses remedy outcomes for workers. The company reports that it found that a supplier in India had not provided workers with the terms and conditions of their employment. In other cases, it discovered incomplete worker contracts that did not include all the necessary employment details. It discloses that the supplier was asked to remediate this issue with its workers via appointment letters and that the workers’ contracts were corrected.

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**OPPORTUNITIES FOR IMPROVEMENT**

**Purchasing Practices:** The company is encouraged to assess the risks of forced labor at potential suppliers before entering into contracts with them and to disclose the outcomes of this process. It is further encouraged to adopt responsible purchasing practices (such as improving planning and forecasting) and to provide procurement incentives (such as price premiums or increased orders) to suppliers to encourage or reward good labor practices.

**Recruitment:** The company may consider developing and disclosing a policy that requires direct employment in its supply chains. In addition, the company may consider requiring employment recruitment agencies—and where relevant employment agencies—in its supply chains to uphold the [ILO core labor standards](#), which include the elimination of forced labor. The company is further encouraged to disclose information on the recruitment agencies used by its suppliers.

**Worker Voice:** The company is encouraged to work with relevant stakeholders to engage with and educate workers in its supply chains on their labor rights. Further, the company may consider disclosing evidence of the positive impact of worker engagement in its supply chains and provide examples of worker engagement initiatives covering different supply chain contexts. In addition, to support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in which workers in its supply chains are able to pursue alternative forms of organizing.

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**ENGAGED WITH KNOWTHECHAIN**

Yes ([Provided Additional Disclosure](#)).

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<sup>1</sup> The US Department of Labor lists China and Malaysia as countries where electronics may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor](#)."