

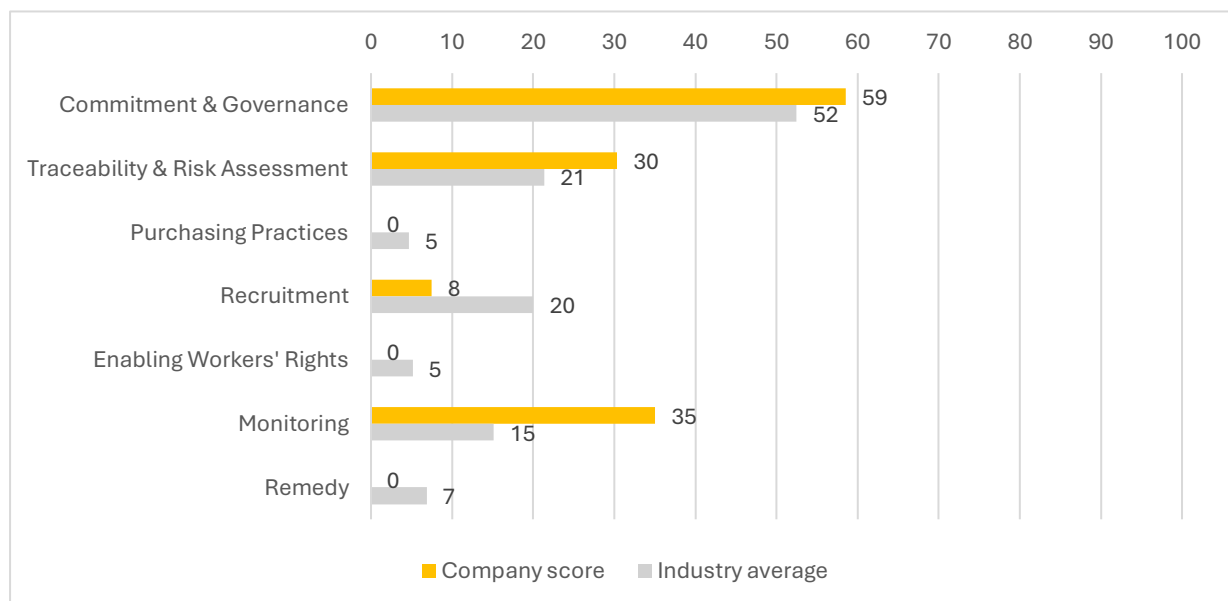
Nokia Oyj (Nokia)

TICKER
NOKIA

MARKET CAPITALISATION
US\$20.1 billion

HEADQUARTERS
Finland

DISCLOSURES
UK Modern Slavery Act: [Yes](#)
Australia Modern Slavery Act: [Yes](#)
California Transparency in Supply Chains Act: Applicability not determined

OVERALL RANKING
16 out of 45
[2022 Rank:](#) 22 out of 60¹
OVERALL SCORE
21 out of 100
THEME-LEVEL SCORES

KEY DATA POINTS
FIRST-TIER SUPPLIER LIST

Yes (Names only, not addresses)

NO-FEE POLICY

Yes (Employer Pays Principle)

RISK ASSESSMENT

Yes

REMEDY FOR SUPPLY CHAIN WORKERS
 No

ENGAGED WITH KNOWTHECHAIN²

Yes

HIGH-RISK SOURCING COUNTRIES³
 China and Malaysia

SUMMARY

Nokia Oyj (Nokia), a communications equipment company, ranks 16th out of 45 companies. Since 2022, the company has adopted version 8 of the RBA Code of Conduct, which removes limitations on the right to freedom of association and collective bargaining, and discloses some forced labour risks identified through its human rights risk assessment process. However, the company did not improve across other themes and, as such, its score dropped by one point. The company's score is based on its above average performance on the themes of Commitment & Governance, Traceability & Risk Assessment, and Monitoring. The company scored zero on the themes of Purchasing Practices, Enabling Workers' Rights and Remedy.

KnowTheChain identified one allegation of forced labour in the company's supply chains, related to alleged Uyghur forced labour. However, the company does not disclose the steps it has taken to address the risks of alleged Uyghur forced labour across raw materials and supply chain tiers. The company is encouraged to improve its performance and disclosure on the themes of Purchasing Practices, Enabling Workers' Rights and Remedy.

LEADING PRACTICES

None.

OPPORTUNITIES FOR IMPROVEMENT

Purchasing Practices: To address forced labour risks in its supply chains, the company is encouraged to adopt purchasing practices that decrease the risk of forced labour, such as improving planning and forecasting and prompt payment (below 90 days), and disclose quantitative data evidencing the implementation of responsible purchasing practices. The company is further encouraged to take steps to ensure that pricing includes the full cost of production, including a living wage/income, and may consider ring-fencing labour costs such that they are not impacted during pricing negotiations. The company should consider integrating [responsible buying practices in its contracts](#) with suppliers, to ensure that the responsibility for respecting human rights is shared.

Enabling Workers' Rights: While the company discloses a third-party "Ethics Helpline" for "external stakeholders", it is unclear that this mechanism is available and communicated to suppliers' workers in practice. As such, the company should ensure that a formal and effective mechanism to report grievances regarding labour conditions is available and communicated to its suppliers' workers and relevant stakeholders, such as worker organisations or labour NGOs. Further, the company is encouraged to take steps to ensure that workers in its supply chains are able to exercise their rights to freedom of association and collective bargaining.

Remedy: The company may consider establishing a process to ensure that remedy is provided to workers in its supply chains in cases of forced labour and disclosing details on this process, such as responsible parties, approval procedures, timeframes, and, crucially, engagement with affected stakeholders. To demonstrate to its stakeholders that it has an effective remedy process in place, the company is encouraged to disclose examples of

remedy provided to its suppliers' workers, including with respect to specific allegations in its supply chains.

¹ The number of companies assessed in the ranking has decreased from 60 in 2022 to 45 in 2025.

² Research conducted through September 2024 or through December 2024, 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](#).

³ For further details on high-risk raw materials and sourcing countries, see KnowTheChain's [2025 ICT benchmark findings report](#).