

# Elisa Human Rights Policy



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# 1 General Statement of Human Rights Commitment

Elisa acknowledges the universal and absolute nature of fundamental human rights that protect the freedom, dignity, and equality of all people. While the protection of human rights is primarily the duty of states, we affirm that our responsibility to respect human rights endures regardless of any government's willingness or ability to meet its obligations in this regard. To uphold human rights is an integral part of our values.

We respect international human rights principles aimed at promoting and protecting human rights, including the United Nations Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, Convention on the Rights of the Child, United Nations Declaration on the Rights of Indigenous People and the European Convention on Human Rights. Similarly, we respect the principles of the Guiding Principles on Business and Human Rights and other international standards such as the OECD Guidelines for Multinational Enterprises. As a signatory to the United Nations Global Compact, Elisa has committed to respecting and promoting human rights. We explicitly commit to respect freedom of association, the right to collective bargaining and the right not to be subject to forced labour, child labour or discrimination in respect of employment and occupation.

We comply with all national laws and regulations. When national laws are incompatible or in conflict with international human rights standards, we strive to find ways to comply with the applicable international regulations. In matters related to forced labour, bonded labour, slavery, or child labour, we adhere to international standards in all situations.

Human Rights Policy sets out the appropriate framework for Elisa's overall human rights commitment, the expectation for Elisa's workers, and the process in which Elisa achieves its objectives and respects its ethical standards and principles. Therefore, this Human Rights Policy applies to Elisa, the entities that it owns, the entities in which it holds a majority interest, and the facilities that it manages. This policy affirms our responsibility and commitment to respect human rights across all of our operations and chains of activities.

Elisa expects its workers, business partners and other parties, whose own impacts may be directly linked to Elisa's operations, products or services, to respect and not infringe upon human rights. Elisa expects its suppliers to commit to respect the International Labour Organization's Declaration on Fundamental Principles and Rights at Work including but not limited to freedom of association and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation. Additionally, we expect our suppliers to respect human rights in line with this policy and we will engage with our supplier community to promote and build capacity to respect human rights. Our suppliers are expected to appropriately communicate human rights standards and Elisa's Code of Ethical Purchasing to their employees and ensure that adequate procedures are in place. Similarly, we expect our customers to respect and not violate any human rights.

We are committed to ensuring that all our employees and stakeholders fully enjoy their fundamental human rights, irrespective of age, gender, sexual orientation, ethnicity, culture, religion, political affiliation, or any other personal characteristic. This commitment covers all individuals and groups who may be impacted by Elisa's activities or through its business relationships. We are committed to providing a safe, fair, and inclusive workplace for all our employees and require that for our contractors' and suppliers' employees as well. We are committed to respecting the human rights of our customers and business partners and expect them to apply these standards in their dealings with or on behalf of us.

In addition to this Human Rights Policy, Elisa has several other policies and principles which address human rights. These include but are not limited to Elisa's Code of Conduct, Elisa's Code of Ethical Purchasing, Elisa's Anti-bribery and Corruption Policy, Elisa's Personal Data Principles, Elisa's Ethical Principle for Data and AI and Elisa's Ethical Sales Principles.

This policy is based on findings from Elisa's human rights impact assessment which was conducted in alignment with the United Nations Guiding Principles on Business and Human Rights. This policy sets the foundations and guides our development of the human rights due diligence process across all of our operations and chains of activities. This is the third revisit of Elisa's Human Rights Policy, and it addresses Elisa's internationalisation and evolution of Elisa's human rights due diligence process.

This policy was developed through discussions with internal subject matter specialists from, various functions such as business units, human resources, legal, and procurement. Elisa has also consulted an external human rights expert in finalising this policy. The policy is communicated to Elisa's employees, business partners, customers, suppliers and other parties and can be found on Elisa's website. The policy is also referred to in Elisa's Code of Ethical Purchasing for suppliers.

## 2 Roles and Responsibilities

For effective human rights governance, Elisa has established roles and responsibilities. All employees, managers and directors within Elisa are responsible for complying with applicable human rights legislation, Elisa's Code of Conduct, this Policy, and any other applicable Elisa Group policies, guidelines and instructions given from time to time. All Elisa group companies including subsidiaries are commonly referred to as Elisa in this policy.

Elisa's Board of Directors approves the annual sustainability report including reporting on human rights and reviews its related targets and performance.

Elisa's Leadership team reviews the annual sustainability report including reporting on human rights, its related targets and performance.

Elisa's Corporate Responsibility Management Board approves the Human Rights Policy and annually monitors the implementation and effectiveness of this Policy.

Elisa's Security Governance Board directs the development, management and supervision of matters related to security and privacy.

Elisa's Equality Working Group follows and ensures the development of diversity, equity, and inclusion within Elisa.

Elisa's Human Rights Steering Group is responsible for ensuring the continuous development of human rights due diligence in Elisa's operations and chains of activities. This group includes representatives from Human Resources, Procurement, Legal and Sustainability departments.

Elisa's Sustainability team is responsible for managing the overall human rights compliance programme, including the human rights due diligence process development.

Human Rights is introduced in Elisa's Code of Conduct Policy training which is mandatory for all employees. In addition, voluntary human rights policy training is available for all employees, and tailor-made training is provided to internal stakeholder groups.

### **3 Elisa's Salient Human Rights Issues**

Elisa has identified and assessed its potential and actual human rights impacts together with stakeholders and industry experts. The identification of impacts has been enhanced through participation in industry initiatives for human rights and continuous dialogue with relevant international non-governmental organisations as well as non-governmental organisations. The impact assessment process and results were also consulted with external human rights experts to ensure alignment with the United Nations Guiding Principles on Business and Human Rights.

The result of the impact assessment has led Elisa to define and prioritise salient issues across its operations and chain of activities. Elisa has integrated these findings into this policy, double materiality assessment and management systems accordingly. We address and take appropriate actions regarding the salient issues and adapt strategies based on outcomes and new information. We also follow the effectiveness of these actions and communicate the findings transparently in internal channels, the Elisa website and the annual sustainability statement.

We seek to engage with affected stakeholders as part of our human rights due diligence, as well as during the tracking, monitoring, and evaluation processes. Elisa recognises that impacts might change and therefore will continuously develop our assessment, monitoring and reporting responsibilities and guidelines.

#### **3.1 Human Rights in Relation to Workers**

We are committed to respecting the human rights of everyone working for Elisa directly as an employee, or indirectly as someone employed by one of our suppliers. The most important human rights standards regarding workers' rights are outlined in the International Bill of Human Rights and the core conventions of the International Labour Organization.

This Policy, together with Elisa's Code of Conduct sets the ethical standards and expectations about Human Rights for our employees. We have zero tolerance for any form of discrimination, abuse, bullying and harassment. We are committed to creating and maintaining a workplace free from such behaviours regardless of gender, race, age, sexual orientation, ethnicity, religion, language, disability, nationality, marital status or any other social characteristics. We treat our employees with dignity and treat everyone equally in recruitment, compensation, career progress and termination.

This Policy together with our Code of Ethical Purchasing sets out the expectations for our suppliers including ethical standards related to human rights and labour rights. We expect our suppliers to implement this set of expectations in all of their operations concerning for example health and safety, freedom of association, collective bargaining, wages and working hours. We expect all our suppliers to sign and accept our Code of Ethical Purchasing or similar terms. We monitor our suppliers in all countries with third-party audits, which also consider human rights and labour standards.

We do not under any situation accept any form of forced labour, bonded labour, or modern slavery within our own operations or in our supply chain. We are committed to minimising forced or compulsory labour risks in our supply chain. We proactively seek opportunities to raise awareness and engage with our supply chain, to build and employ a risk-based approach to assess and drive improvements to the management of forced or compulsory labour risks.

Similarly, Elisa does not approve of the use of any form of child labour. We believe that every child is to be protected from economic exploitation and from carrying out work that can be considered to have a negative effect on the child's education or be harmful to the child's health or development. We take action to prevent, mitigate and remediate impacts related to child labour. We engage with our suppliers to assess and monitor our supply chain for child labour risks. Accordingly, children under the legal working age are not to be recruited or employed. Further, any hazardous work shall not be conducted by an individual under the age of 18 years. Where a child is employed, the best interests of the child shall be the primary consideration. If child labour is detected, we will act in the best interest of the child.

We do not tolerate or accept any form of human trafficking in our operations or chain of activities.

Any suspicion of the use of forced or compulsory labour by our supplier will lead to immediate action to investigate and act accordingly on the reported potential concern. Where actual incidents are detected and engagement does not result in timely improvement, we reserve the right to terminate our operations with relevant suppliers.

### **3.2 Human Rights in Relation to Children's Rights in Digital Environment**

Elisa supports a common industry approach to child safety online and accepts that children require, due to their role in society, specific protection. We follow all applicable international standards, such as the Convention on the Rights of the Child, and national regulations related to children. We support and are actively involved with the development of the Rights of Children in Digital Services.

We understand our special role in protecting children and attempts to prevent the distribution of child sexual abuse material. Therefore, Elisa has decided to exercise its right as a telecom operator

to offer its services, ensuring that any site proven to host child sexual abuse material, in accordance with the Finnish Act on blocking child pornography, will be filtered.

### **3.3 Human Rights in Relation to Data Security**

Elisa understands its special role in relation to privacy, data protection, data security and the protection of confidential communications. Elisa promotes the principle of confidential communication to all its customers as a foundational and ingrained principle of its operations.

Elisa complies with all applicable privacy and data protection regulations, including without limitation to the EU General Data Protection Regulation, the Data Protection Act and the Act on Electronic Communications Services, as well as any applicable national data protection legislation when operating globally. Elisa has specific policies, which it strictly adheres to, in relation to data security and data protection. These include for example our Security Policy and other related policies and standards.

As a telecom operator, Elisa takes appropriate actions to protect the human rights of its stakeholders in relation to privacy, data protection, data security and confidential information. This includes considering the rights of privacy and data security in the human rights due diligence. The key actions in promoting privacy and data protection matters in its operations and chain of activities are carried out through training, auditing, and proactive improvement measures among others.

The protection of confidential information, personal data, and confidentiality of communications is carried out by implementing security and privacy measures as part of development phases – this includes proper training of Elisa’s personnel, strong user access management and ensuring that access is granted only to the ones needing them on work. Key services are continuously monitored to prevent and recognise incidents on services. Elisa ensures prompt and appropriate management and review of all allegations of personal data and security breaches.

We manage and monitor our compliance closely considering all our legal obligations and relationships with law enforcement authorities to ensure that human rights and data security related instructions, standards and regulations are followed and respected. Governmental authorities in certain situations have legitimate reasons for requesting assistance from Elisa. Access to information for the purpose of governmental authorities in relation to national safety or criminal investigation is strictly limited and secured. All governmental requests are carefully reviewed by Elisa in an appropriate manner.

We also consider ethical standards in the development and use of artificial intelligence.

### **3.4 Human Rights in Relation to Freedom of Speech**

Elisa as a telecom and technology provider, recognizes and commits to respect the freedom of expression and speech. We believe that a diverse and inclusive environment, where individuals can express their opinions and ideas freely, is essential for fostering innovation and growth.

However, we also recognise our responsibility to combat any form of expression and speech that incites violence, discrimination, or hostility against individuals or groups based on race, ethnicity,

gender, sexual orientation, religion, or any other personal characteristic. We maintain a zero-tolerance policy towards bullying or other illegal forms of speech within our company and in our interactions with external partners and the public. To this end, we encourage open and respectful dialogue among our employees, stakeholders, and the communities we serve.

### **3.5 Human Rights in Relation to Ethical Sales**

A mandatory ethical sales procedure is required for the business opportunities that are identified to be pursued in countries having higher human rights risks. A compliance check including a sanctions screening and dual-use product assessment is carried out prior to the ethical sales procedure assessment. The procedure consists of a risk assessment concerning the intended use of the technology in question to identify potential human rights, anti-bribery and corruption and customer-related risks. We also consider political stability and reported human rights violations specific to the country as part of this procedure. If any risks are identified, mitigation measures are introduced accordingly. The approval/rejection review of a business opportunity is done in Elisa's Ethical Sales Procedure.

## **4 Notification Channels**

We maintain grievance mechanisms for employees, suppliers, customers, and external stakeholders, including communities, and acknowledge our responsibility to ensure that they are fair, accessible, and transparent.

Elisa has an operational-level whistleblowing channel, that is available on our website in multiple languages and can be used by any stakeholder. This channel is communicated to suppliers through the Elisa Ethical Code of Purchasing and to all relevant stakeholders through the Elisa Code of Conduct. We also encourage business partners and all their employees to report any suspected violations or non-compliance directly to Elisa.

These reports are vital for us to mitigate and correct actual and potential human rights impacts as well as continuously develop our human rights due diligence process.

We acknowledge that if we identify that we have caused or contributed to adverse human rights impacts on individuals, workers, or communities, we should provide for or cooperate in their remediation through legitimate processes. We also recognise that according to the UN Guiding Principles on Business and Human Rights, remedy is a shared responsibility of states and corporations. Therefore, the specific actions we take will depend on the nature of our involvement in the adverse impact and will be guided by applicable legislation and international standards.