

ELISA'S ETHICAL PRINCIPLES FOR DATA AND ARTIFICIAL INTELLIGENCE

1 PURPOSE

Elisa's vision is to be the best in connectivity, a recognised international provider of digital services and a brand of excellence. Our mission is a sustainable future through digitalisation. The Elisa Code of Conduct¹ outlines our way of working and reflects our core values, which are Customer Orientation, Responsibility, Renewal, Results Orientation and Collaboration.

We have been building our brand of excellence for years and the trust of our stakeholders is the foundation of our activities.

At Elisa, we are confident that data provides significant benefits for human wellbeing and society, and we want to make that become reality. With digitalisation, we are providing solutions for things that are important to people and for sustainable development.

It is important for us that we act in a responsible, ethical and legal way in all situations. Elisa's Code of Conduct sets the ethical standards and expectations for our employees. We expect a similar approach from our partners and suppliers. Elisa's Ethical Principles for Data and AI further specifies and gives guidance in creating trust in using data and designing solutions.

2 DEFINITIONS

Data can be defined as facts or figures, or information that's stored in or used by a computer. Our definition of artificial intelligence (AI) is based on the European Commission Communication on AI². We collect, produce and process large volumes of various kinds of digital data in our operations and networks, and data is the raw material for analytics, information management and decision-making. We use AI, machine learning (ML), robotics and analytics tools to processing the data.

3 SCOPE

Elisa's Ethical Principles for Data and AI are valid for all the kinds of data used for research, proactive design, implementation, testing, use and follow-up. These principles are applicable to every employee at Elisa, including its subsidiaries, as well as to our affiliates, partners and suppliers.

¹ Elisa Code of Conduct <https://elisa.com/corporate/about-elisa/code-of-conduct/>

² https://ec.europa.eu/futurium/en/system/files/ged/ai_hleg_definition_of_ai_18_december_1.pdf

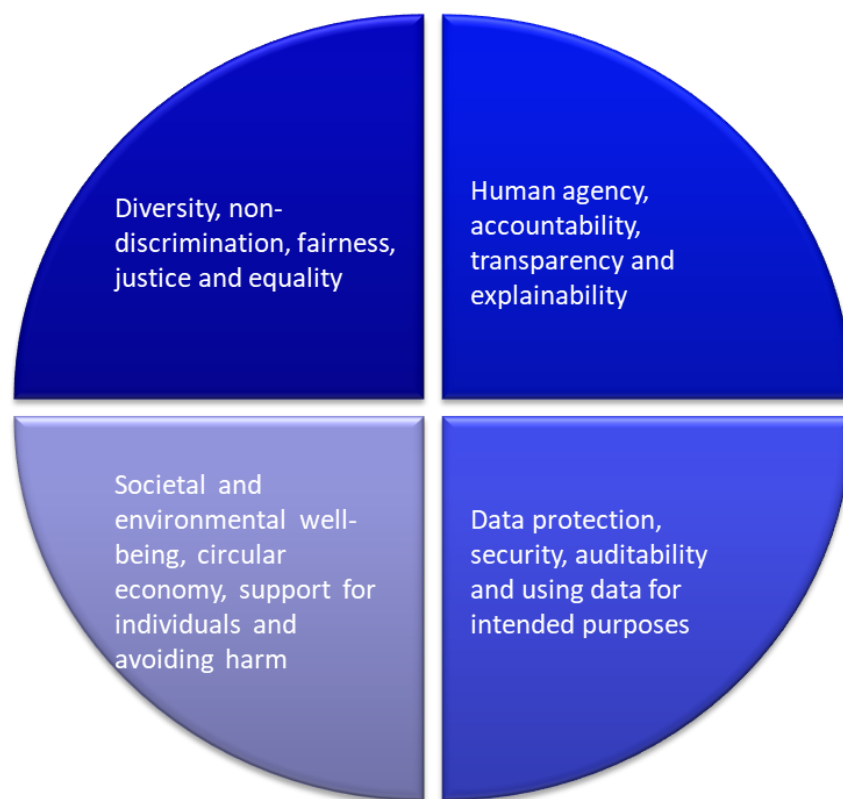


4 PRINCIPLES

We acknowledge the responsibility ingrained in the collection, management and automated use of data. Data processing can be based on AI-enabled techniques, algorithms, analysis and applications. Data automation enables us to make our technology, products and services even more secure, efficient, reliable and valuable for our customers and society as a whole.

Elisa's Ethical Principles for Data and AI respect fundamental human rights, applicable legislation and core values to ensure an ethical purpose and with the goal of making the data technically robust and reliable.

We recognise the following main principles for our operations.



Human agency, accountability, transparency and explainability

Accountability always remains with the humans who control, modify or terminate the application, if needed. Elisa personnel are responsible for the data we use and for managing it.

The data must be processed lawfully, fairly and in a transparent manner, and the methods used need to be open and easy to explain in order to develop trust.



Data protection and security, auditability and using data for intended purposes

The confidentiality of personal data and communications as well as the protection of customers' privacy are important basic values in all our operations and are described in Elisa's Data Protection Principles³ and Data Protection Policy.

We use proper information security solutions and processes, and our monitoring, patching, and reporting of security issues are properly designed as defined in Elisa's Information Security Policy.

All datasets and accompanying analytics tools carry a history of human decision-making. As far as possible, that history should be auditable. This should include mechanisms for tracking the context of collection, methods of consent, chains of responsibility, and assessments of data quality and accuracy.

All people making use of data should strive to use the data in ways that are consistent with the intentions and understanding of the party disclosing the information. Honest information should be provided to individuals so that they can understand what data about them is being collected and how it is being processed.

Diversity, non-discrimination, fairness, justice and equality

All people making use of data should promote fairness, justice, diversity and equality in how the data is being utilised for decision-making. The outcome of processing by AI systems should be equal for all individuals regardless of their socio-economic background or status, and there should be no discrimination, whether direct or indirect. Our aim is to create fair and equal opportunities as a result of using data and of utilising AI as a decision-making tool.

Societal and environmental well-being, circular economy, support for individuals and avoiding harm

Data should be used to enhance positive social change and to enhance sustainability and ecological responsibility. We want to make that a reality and to be a responsible player in our society, with the goal of increasing fairness in society. We aspire to use data and to design our AI and analytics systems to provide added value to our customers and other stakeholders, as well as for the environment and society. All actors should develop and deploy sustainable solutions in alignment with the circular economy, while reducing their negative impacts on the environment, climate and natural resources.

All actors should acknowledge transparency in decisions without harming people or jeopardising their safety or security.

Elisa's policies and principles provide further guidance.⁴

³ Elisa's Data Protection Principles

http://esco.elisa.fi/rest/esco/blob/asiakastuki/Elisa_Data_protection_principles_eng.pdf?ga=2.210306390.2105575247.1619598098-508155646.1544606143

⁴ <https://elisa.com/corporate/governance/policies-and-guidelines/>



5 APPROVALS AND OWNERSHIP

Corporate responsibility and ethical and lawful business are essential for us in all situations. Our operations are guided by the Elisa Code of Conduct, and we are committed to the principles of the UN Global Compact. We constantly review our practices and related principles in order to comply with and to further improve Elisa's Ethical Principles of Data and AI. These principles are accepted by Elisa's Corporate Responsibility Management Board, and they are revised frequently.

6 LEARNING AND CONTINUOUS IMPROVEMENT

Our approach is to set and follow these principles, to learn continuously and systematically from practical cases, and to predict growing future needs.

With these principles, we are aiming to further increase awareness of ethics in designing, developing, implementing and using data for positive purposes. We also want to increase awareness of ethical data usage among all Elisians to harness the opportunities it provides while ensuring it is used for ethical purposes. Based on this, we will systematically review and update these principles.

7 REMEDIES

We have transparent mechanisms for reporting breaches of the Elisa Code of Conduct. Elisians, Elisa's partners and other stakeholders can report suspected violations of Elisa's Code of Conduct through Elisa's anonymous whistleblowing channel⁵ or through other company channels. Elisa's whistleblowing channel is available on our website and applies to Elisa Corporation and the subsidiaries under its control. All reports are processed in strict confidence according to Elisa's processes.

⁵ Elisa's whistleblowing channel <https://corporate.elisa.com/on-elisa/code-of-conduct/whistleblowing/>

