

# ELISA HUMAN RIGHTS POLICY

## 1 GENERAL STATEMENT OF HUMAN RIGHTS COMMITMENT

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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 governments, we affirm that our responsibility to uphold human rights endures regardless of any government's willingness or ability to meet its obligations in this regard. The respect for human rights is an integral part of our values. This Human Rights Policy (hereinafter, the "Policy") affirms our responsibility and commitment to respect human rights across all of our operations. policy affirms our responsibility and commitment to respect human rights across all of our operations.

We comply with all national laws and respect international human rights principles aimed at promoting and protecting human rights, including the United Nations Declaration of Human Rights and the International Labor 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 and the European Convention on Human Rights. Similarly we attempt to adhere to the principles of the Global Compact, the Guiding Principles on Business and Human Rights and other international standards such as the OECD Guidelines for Multinational Enterprises. As signatories to the UN Global Compact, Elisa has committed to respect and promote human rights.

The Policy sets out the appropriate framework for Elisa's overall human rights commitment, the expectation set out to Elisa's employees, and the process in which Elisa achieve its objectives and respect its ethical standards and principles. Therefore, the Policy applies to Elisa, the entities that it owns, the entities in which it holds a majority interest, and the facilities that it manages. Elisa expects its employees, business partners and other parties, whose actions and omissions may directly impact Elisa's operations, products or services, to respect and not infringe upon human rights.

We seek to ensure that all our employees and our stakeholders enjoy all their fundamental human rights, regardless of age, gender, sexual orientation, ethnic, cultural, religious or political belonging. We are committed to providing a safe, fair and inclusive work place for all our employees and to requiring that for our contractors' and supplier's 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 interactions with or on behalf of us. We expect our suppliers to respect human rights in line with this Policy and 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.

This Policy, Elisa's Code of Conduct, Elisa's Code of ethical purchasing, Elisa Policy on Conflicts of Interest, Elisa's Anti-Corruption and Bribery Policy and other appropriate policies together form the



principles and ethical standards Elisa promotes and sets out the processes on how human rights are managed within the operations of Elisa.

## 2 TOP MANAGEMENT COMMITMENT

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Elisa's top management, including board members, senior management and CEO all commit to respect and promote human rights. This policy is accepted by Elisa executive board. This Policy is regularly reviewed by Elisa corporate responsibility management board.

## 3 SPECIFIC QUESTIONS ON HUMAN RIGHTS COMMITMENT

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Elisa promotes and respects all internationally accepted human rights. Elisa also recognizes that certain human rights have a more central role in relation to Elisa's business operations.

### 3.1 HUMAN RIGHTS IN RELATION TO WORKERS

We are committed to respect the human rights of everyone working for Elisa directly as an employee, or indirectly as someone employed by one of our suppliers. We consider human rights to include the rights as in the Universal Declaration of Human Rights and the core conventions of the International Labor Organization's Conventions. We always comply with local work legislation and local collective labor agreements.

Elisa's Code of Conduct sets out the ethical standards and expectations of our employees. The Code of Conduct sets out the expectation that all our employees are treated without discrimination and in accordance with national laws, international human rights and international labor standards.. Our Code of ethical purchasing sets out the expectations we have for all our suppliers and specifically sets our ethical standards related to human rights and labor standards. Our suppliers must comply with the set expectations in all their operations concerning for example health and safety, freedom of association, collective bargaining, wages and working hours.

Elisa wishes to provide a work place in which no one is discriminated or unfairly treated based on, gender, race, age, religion, language, nationality or the like. This is a key principle and the ethical standard within Elisa. We wish to ensure a safe and equal working place for everyone. Our Equality Working Group follows and ensures the development of equality and non-discrimination within Elisa. We treat our employees with dignity and treat everyone equally in recruitment, opportunities, compensation, career progress and termination. We do not accept any form of harassment, bullying or sexual harassment..

Elisa does not under any situation accept forced labor, bonded labor, slavery or any form of modern slavery within Elisa or in its supply chain. Any suspicion of the use of forced or bonded labor by our Supplier will lead to immediate action. We do not tolerate or accept any form of human trafficking.



Our employees working in logistics are required to ensure that human trafficking does not occur during transportation of products.

Similarly, Elisa does not approve the use of child labor with no exceptions. 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. Children under the legal working age are not to be recruited or employed. Any hazardous work shall not be conducted by an individual under the age of 18 years. If child labor is detected we will act in the best interest of the child.

### 3.2 HUMAN RIGHTS IN RELATION TO CHILDREN'S RIGHTS

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 regulation 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 abuse material. Therefore, Elisa has decided to use its right as a telecom operator to offer its services so that if any site is proven to host child abuse material in accordance with Finnish Act on blocking child pornography it will be filtered. The child abuse filtering is based on a list originally provided and regularly updated by Interpol and Finnish National Bureau of Investigation. Elisa ensures that the list provided is regularly submitted to Elisa's networks to unable users of Elisa mobile or internet networks to access such sites.

### 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 idea of confidential communication to all its customers and as a foundational and ingrained principle of its operations.

Elisa complies with all applicable privacy and data protection regulation. Special attention is paid 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 considers the positive steps it must take 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 of Elisa. The Security Governance Board of Elisa directs development, management and supervision matters related to security and privacy.

The protection of confidential information, personal data, and confidentiality of communications is carried out by implementing security and privacy issues as part of development phases – this includes proper both training of the personnel regarding management and access to the data and granting access only to the ones' needing it for work. Key services are continuously monitored to



prevent and recognize incidents on services. Elisa ensures prompt and appropriate management and review of all allegations of personal data and security and breaches.

Governmental authorities in certain strict situations have legitimate purposes for requesting assistance from Elisa. 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 issues are respected. Access to the information for the purpose of Finnish 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.

### 3.4 HUMAN RIGHTS IN RELATION TO FREEDOM OF SPEECH

Elisa accepts its specific role in society as a telecom operator in relation to the freedom of communication and the freedom of safe and private conversation. Each user should be able to trust in the confidential and private forms of communication provided by Elisa. Freedom of speech is closely associated with and depends upon the right to privacy if it is to materialize.

Elisa does not accept hate speech or other illegal forms of speech in any form. Elisa works and promotes to minimize illegal forms of speech.

## 4 PROCESS FOR HUMAN RIGHTS PROTECTION

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In accordance with the Guiding Principles on Business and Human Rights, we commit to respecting human rights and we undertake human rights due diligence as part of our corporate decision-making process. We consider human rights in our operations, actions, development, joint ventures and other activities. We also consider ethical standards in the development and use of artificial intelligence.

This Policy complements other Elisa policies, such as Code of Conduct, Code of ethical purchasing and other applicable policies. Our Code of Conduct and Code of ethical purchasing include a specific section on human rights.

All employees and contractors must understand and apply this Policy. We will provide appropriate training for all employees and contractors and enhanced training to relevant managers on the policy and relevant processes that support it, including human rights due diligence.

We will develop monitoring and reporting responsibilities and guidelines, and intend to provide regular disclosure on our progress against our human rights commitments as part of our broader sustainability reporting. Our sustainability report is assured by an independent third party. We have conducted a human rights impact assessment by a third party, which acted as the basis for this Policy.

We require all our new suppliers to sign and accept our Code of ethical purchasing. We monitor our suppliers in risk countries with third party audits, which also considers human rights and labor standards. Where breaches are detected and engagement does not result in timely improvement, we reserve the right to terminate our agreement with relevant suppliers.



We require all our products and services, which are considered dual-use goods as described in EU Dual-Use Regulation, to undergo a detailed export control process and due diligence process. All our policies and processes comply with Dual-Use regulation and laws. Elisa has in place detailed policies on the process related to dual-use goods for each department connected to the products development, sales or otherwise linked to the process.

## 5 HUMAN RIGHTS REMEDIES

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We maintain grievance mechanisms for employees, customers and external stakeholders, including communities, and acknowledge our responsibility to ensure that they are fair, accessible and transparent. We encourage our suppliers, their sub-suppliers and all their employees to report any suspected violations or non-compliance directly to Elisa.

Elisa has an operational level grievance mechanism, which is an anonymous whistleblowing channel that can be used by any stakeholder and is found on our website. Each claim is appropriately reviewed and processed in a timely manner. All claims are first assessed by members of our legal team who contact the appropriate people to review the claim based on its theme. If the claim has allegations against an employee of Elisa that person is automatically removed from the review. In particular, we are committed to taking additional measures to protect whistle-blowers, where appropriate. We attempt to find an amicable solution and a remedy most suited for each situation.

Where we are made aware of adverse human rights impacts in our value chain, we will actively participate in their investigation. In relation to claims of use of child labor Elisa will actively attempt to find the best solution in the best interest of the child involved.

When national laws are not compatible or in conflict with international human rights, we attempt to find ways in which to also comply with the applicable international regulation. In matters related to the use of forced labor, bonded labor, slavery or child labor we comply with international standards in all situations.

