

February 23, 2010

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The Honorable Richard J. Durbin
Chairman, Subcommittee on Human Rights and the Law
United States Senate
Washington, D.C. 20510

DEAR CHAIRMAN DURBIN,

Thank you for your letter of January 29, 2010 following the allegations of reported Chinese cyber-attacks on Google and other companies. Like many other multinational companies, we are concerned and have been following the situation closely. We appreciate your interest in corporate activities that continue to balance economic and social growth, with the needs to protect human rights and dignities.

Following your August 6, 2009 letter, we did attend the Global Network Initiative (GNI) open house in Washington, D.C. on September 10, 2009. We heard interesting cases and experiences of other companies, and from the GNI about their processes and goals. We continue to monitor the activities of the GNI and are encouraged that they continue to develop their principles based on voluntary action of companies to respect and uphold human rights.

As we described in our August 27, 2009 response to your previous letter, Nokia has for a number of years been engaged in various initiatives by groups focusing on human rights and sustainability efforts. As our participation in those groups has been ongoing, we are comparing and contrasting these initiatives with those of the GNI. Especially in key markets like China, we do proceed with regular business caution and considerable attention to the impact our products have in the market. As previously stated, Nokia believes there is a direct link between mobile technology and economic and social well-being and that by providing people with the means to communicate with one another without regard to where they live or work, we are greatly enhancing the quality of lives of consumers in China and all societies.

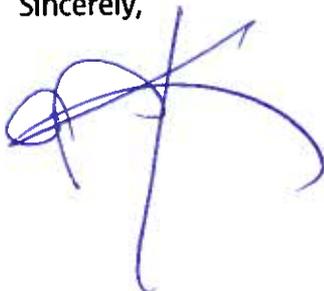
Nokia's principal product offering in China is mobile communications devices, which account for more than 99% of our revenues in the market. We have an industry-leading market share in the Chinese mobile device market. Nokia currently operates one manufacturing facility in Beijing, which is geared to high-value, low to medium volume devices; one production facility in Dongguan, which concentrates on the production of high-volume, cost sensitive mobile devices; and a Nokia Research Center (NRC) at Tsinghua University in Beijing. Our manufacturing facilities in China are part of an integrated global production network, giving us flexibility to adjust our production volumes to fluctuations in market demand in different regions.

The services we currently offer in China are focused on offerings such as Nokia Life Tools (e.g. weather forecasts, agricultural information), mobile education (e.g. English as a second language), "Comes with Music" (music store), and mobile wellness applications (e.g. health information). Generally, these offerings consist of content developed by third-party partners with Nokia acting as an aggregator and distributor. We do not anticipate that the nature of these service offerings will normally implicate human rights issues.

To the extent we face any situations with these or future service offerings that involve any potential human rights issues or government involvement, in China or elsewhere, we will employ the internal processes we described on our response to your earlier letter. We are confident that these procedures will assist us in complying with both our own Nokia values that are embedded on our Code of Conduct as well and well-established international norms for the protection of human rights. We feel that continuing to operate under our internal Code of Conduct, continuing to participate in the Global e-Sustainability Initiative (GeSI), the European Alliance for CSR, and the United Nations Global Compact (UNGC), are the best course of action for Nokia at this time. In addition, we closely follow the work of Professor John Ruggie, the UN Secretary-General's Special Representative on Business and Human Rights, as he is developing a framework for business and human rights. As we described on our previous letter, we will continue to both monitor the development of the GNI and engage in the dialogue with industry and governments about the critically important issue of the protection and promotion of human rights such as freedom of expression and privacy.

I thank you once again for the opportunity to provide Nokia's views on this matter. If you have further questions or need additional information, please contact Leo Fitzsimon, the head of Nokia's Washington, DC office, at leo.fitzsimon@nokia.com, or by phone at (202) 887-0145.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Leo Fitzsimon', written over a light blue circular stamp or watermark.