

Employee Perspectives Towards Language Policy: An Interpretive Case Study of a Multinational Enterprise and Its Language Policy

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This thesis explores the corporate language policy of a Finnish multinational enterprise, UPM. To understand the functionality of the policy, questionnaire data from 12 employees have been studied for their perspectives. Then, the language policy itself has been inspected in detail. The aim has been to comprehensively understand the language regulation in the enterprise to identify reliable and valid ways of developing the policy.

To attain these aims, this study employs three methods in gaining a comprehensive understanding of the policy: a questionnaire to assess employee perspectives on the policy, close reading and classification of the LP, and interpretive policy analysis (IPA) by Dvora Yanow (2000). Additionally, the analysis includes the Code of Conduct and the website of the enterprise. By taking an interpretive approach to researching the language in the enterprise, the multiple subjective social contexts can be accessed.

This study concludes that the general viewpoint of the twelve employees is positive overall but that the enterprise still has room for developing the policy further. As the purpose of the research has ultimately been to find these points of interest, it concludes that the main points for development are as follows: tone of communication, use of artificial intelligence, translation, multilingualism, and unifying language-related policies. The study creates leverage for possible improvements in the corporation but does not aim to carry out any measures as it is.

Key words: corporate language policy, interpretive policy analysis (IPA), language ideology, international business (IB) research.

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List of abbreviations

AI	Artificial intelligence
BELF	English as a business lingua franca
CCL	Common corporate language
CoC	Code of conduct
CSR	Corporate social responsibility
ELF	English as a lingua franca
IB	International business
IPA	Interpretive policy analysis
LP	Language policy
LPP	Language planning and policy
MNC	Multinational corporation
MNE	Multinational enterprise

1 Introduction

In this globalised economy, the existence of locally fragmented multinational business firms is inevitable, and multilingualism is often part of the lived reality of the employees. Multinational corporations (MNCs) can be considered multilingual almost by default (Angouri 2013, 565) as they function in multiple nations, most likely employing different languages or different variations of languages. It is important to study these entities on various levels, from the individual to the organisational, but in this thesis, a specific focus is placed on the language policy level and the employee level. This study utilises applied linguistics methodology to understand the views of the individual language users in a Finnish multinational corporation. This study is interdisciplinary, as it exists at a juncture of international business (IB) research and interpretive linguistic research.

Language-sensitive IB research is a multidisciplinary branch of business research that studies language diversity in the context of international business (Piekkari, Gaibrois, and Johansson 2022, 145). The motivation for IB research from a linguistic perspective has been articulated in previous research: “International business as a subject area ... would still benefit from drawing more extensively on language-focused disciplines such as linguistics, in particular applied linguistics, sociolinguistics, and psycholinguistics, as well as translation and communication studies” (Tenzer, Terjesen, and Harzing 2017, 817). This language-focused study fills the gap between regulating language and the realised outcome of that regulation in international business.

According to Brannen, Piekkari, and Tietze (2014), language has a “multifaceted role” in international business. With language serving a decisive role in corporations and IB, the existence of *language management*, *planning*, and *policymaking* becomes crucial (Lesk, Lavric, and Stegu 2017, 269). These and related terms will be described in Chapter 2 of this study. Language use is often explicitly or implicitly regulated, although articulated language policies are not always employed. Thus, language policy (LP) aims to direct how languages are used (Spolsky 2003, 5). These policies can be created top-down or bottom-up, and they can regulate different aspects of language use. Companies may value language regulation and policies differently. They may aim to emphasise linguistic diversity or attempt to unify language use by encouraging employees to use a common *lingua franca*, the language oftentimes being English.

Language policies have been researched extensively in many fields, such as political science, sociolinguistics, and economic and management studies (Lesk, Lavric, and Stegu 2017, 269). The research is multidisciplinary and multifaceted, and the terminology used reflects that. *Language beliefs* and *ideologies* influence the creation and study of language policies. These terms and previous research on the matter will be discussed in Chapter 2. This influencing language use inherently includes power dynamics and reflections of the languages with each other and their surroundings.

The purpose of this thesis is to understand the *functionality* of a language policy in a Finnish foreign-owned company, and specifically how the individual employee perceives them. Functionality in this context can be seen as how effective the policy is and how well it serves the individual employee or the company. Previous research has touched on this topic, but it is crucial to shed light on the employees themselves. The Finnish corporate environment is well-represented in recent research literature regarding multilingual practices (Tenzer, Terjesen, and Harzing 2017, 831). However, this specific company or this temporal context in Finland have not yet been investigated. This study aims to shed light on the specific language policies and how they are reflected in the realities of the people working in this corporation.

This thesis examines the language policy of the Finnish multinational corporation UPM-Kymmene Oyj (hereon addressed as “UPM”), which specialises in the production and development of biomaterials. The company operates mainly in the forest industry but has recently branched out to biochemicals and biofuels (UPM 2024a). In recent years, the forest and paper industry has been under scrutiny for the environmental impact of the businesses. The current media environment in Finland regarding the forest industry proves this research current, as language use is at the core of handling media relations. The enterprise operates in 46 countries globally and has production in 11 different countries. According to the locations of the production plants alone, UPM must accommodate at least 11 languages, thus, the corporation itself is multilingual. UPM has not been previously examined from a language-sensitive IB research or linguistic research perspective, which leaves a gap for this study to fill.

The research questions of this study are as follows:

1. How does the individual employee perceive the UPM language policy?
2. How does UPM articulate its language policy?
3. What could the company consider in developing this policy further?

The employee perspectives of the first question are examined with the survey that was sent to the employees in the communication branch internally. The survey responses and employee views are studied carefully and it is examined how the language policy and these perceptions mirror each other. The language policy of the multilingual corporation may not be sufficiently reflected in the day-to-day lives of the employees or management, or the language policy is not sufficient in managing the multilingual realities. A single survey does not provide a full and comprehensive image of how these language policies are realised, but it does map the ideas and opinions of the employees themselves. Both the first and second questions also reflect language ideologies that may influence both the corporate and individual views on language. Language ideology is described in Section 2.2 and serves as an overarching background factor in the analysis.

The second research question addresses the *articulation* of the language policy, which in this context refers to how UPM's language policy is explicitly worded. This is investigated through close reading and categorising the policy based on different levels of language policy. The classification of language policy compiled by Johnson (2013, 10) is introduced in Chapter 2.4 and applied to the policy in the Results. The in-depth interpretive analysis of this study is done according to Yanow's (2000) interpretive policy analysis (IPA) framework, which is described in Chapter 2.5. Lastly, by combining these findings in the Discussion chapter of this thesis, the third research question is explored. This analysis and results provide novel analytical information on the language policy of the enterprise and can aid in developing the guidelines further.

This study hypothesises that the language policy does not serve the needs of the employees holistically, and this may reveal points of conflict or a need for further development of the policy. Additionally, by studying possible ideologies affecting the policy, the policy can be understood in the greater context of international business. Per previous research, employees may see language policy as complex, difficult or thought as only to concern a select few people in the organisation (Lønsmann 2017, 121). This study will attempt to address this misconception in the context of UPM. Furthermore, some prospects are presented for UPM to bridge the possible gap between language policy and practice in the Discussion chapter.

2 Language in international business

This chapter elucidates the definition of language policy and the terms associated with it. Language policy, especially in the corporate environment, has received multiple definitions, and it reflects the history of its multidisciplinary research. First, the language-sensitive international business research field is explored briefly, as well as language ideologies and the notions of English as a lingua franca. Then, language policy is explicated, followed by a focus on corporate language policy specifically. In Section 2.3, key research and theories on language policy are introduced. Sections 2.4 and 2.5 offer ways of understanding and researching LP, of which interpretive policy analysis is used as the main framework for analysis. Versatile methods and theories must be applied to “comprehensively understand the complex influence of linguistic diversity” (Tenzer, Terjesen, and Harzing 2017, 836) in business.

2.1 Language-sensitive international business research – an overview

Language-sensitive IB research is a field of research that studies international organisations from a linguistic perspective (Piekkari, Gaibrois, Johansson 2022, 146). The research centres on language diversity, practices, and interactions, and it originated from international business research as the need for understanding multilingual circumstances grew (ibid.). Piekkari, Gaibrois, and Johansson (2022, 150) have distinguished three paradigms of language-sensitive IB research: *positivist*, *interpretivist*, and *critical*. These paradigms are now briefly introduced, followed by some key research concerning this study.

Based on their meta-theoretical analysis, positivist language-sensitive IB research aims for the generalizability of results and neutral and objective positioning of the researcher(s) (Piekkari, Gaibrois, Johansson 2022, 152). The positivist paradigm is also the most prevalent in this field of research but can also exhibit some limitations in reflexivity or offer top-down viewpoints (Piekkari, Gaibrois, Johansson 2022, 153). Interpretive reading, then, emphasises the “lived experiences” of the participants and the reflexive position of the researcher (ibid.). Critical reading, in turn, focuses on questioning power relations (Piekkari, Gaibrois, Johansson 2022, 156). Thus, an examination of language policy could fall under any of the three categories. In this threefold paradigm, this study can be considered to fit the interpretive category, as it explores both the experiences of the employees and analyses LP critically while highlighting the subjectivity of interpretation.

These next paragraphs introduce relevant language-sensitive IB research regarding this study. Special focus is placed on the similarity of methods to this study and the scope of the research. A doctoral thesis by Tribble (2014, 8) has employed similar methods as this study on educational language policy on Native American languages in Oklahoma. The aim of the thesis was to encourage the self-reflexivity of policymakers and elicit more action towards language preservation (Tribble 2014, 11). The study was conducted through interviews and interpretive policy analysis, which are similar to this study, albeit the survey is employed in data collection instead of interviews.

A study by Barner-Rasmussen, Gaibrois, and Wilmot (2024, 1) focused on language ideologies in the workplace and how different ideologies affect participation at work. They analysed 82 interviews and found that some ideologies support participation, and some obstruct it (ibid.). Another study by Barner-Rasmussen et al. from 2014 examined the cultural dimensions of language in MNCs, and especially how skills in language and culture may help individuals cross boundaries within the corporation (Barner-Rasmussen et al. 2014, 886). They employed both qualitative and quantitative methods and collected data by semi-structured interviews (Barner-Rasmussen et al. 2014, 899). They found that skills in both culture and language are beneficial in performing at the workplace and that both skills are cumulative and intersectional (ibid.). These studies have emphasised the importance of language and researching language in IB research.

2.2 Language ideologies related to language use in IB

Next, some ideologies and related terms in business are inspected. Seargeant (2009, 26) describes language ideology as the structured ways we discuss and imagine language. Broadly speaking, this also includes the beliefs and conceptions about language and that “language use always occurs within an ideological context” (ibid.). In the next subsections, the relevant language ideologies to this thesis are briefly described. This study aims to understand whether language policy issues have connections to language ideologies in the context of UPM. Language policy is often connected to larger structures than the single organisation it aims to manage, and this will be explicated in Sections 2.3 and 2.4.

Language ideologies affect language policy and planning (LPP) and vice versa (Spolsky 2003, 14). Equally, *language attitudes* affect the formation of language ideologies (Palviainen and Huhta 2015, 193). Attitudes are subjective and steer human decision-making sometimes unknowingly (ibid.). Additionally, Spolsky (2018, 328) points out “non-linguistic forces”

behind both ideologies and policies, such as historical and political factors, colonisation, societal or economic issues, and education. These aspects affect, enforce, or create ideologies in societies and cultures (Spolsky 2018, 335). Ideology is connected to power, as the dominant ideologies in society are often state-backed (Spolsky 2018, 326, 330). Language policy reflects these ideologies and can uphold or dismantle societal norms. Policy choices may, for example, prioritise a certain language over another and so support a language ideology (Spolsky 2003, 14).

2.2.1 English as a business lingua franca

One central language ideology in the context of this study is *English as a lingua franca* (ELF). According to Barbara Seidlhofer (2011, 7), the use of English as a multinational and multilingual “contact language” can be used by people whose first language is not English. This means that ELF is the *communicative medium* between these people (ibid.). This linguistic position has developed globally due to historical actions, and the use of ELF has increased significantly after the creation of the internet (ibid.). Incrementally, as English functions as a lingua franca globally, it is not surprising that English can be seen as a *business lingua franca* (BELF) as well.

Multinational corporations do not only work with local governments and states but function outside of them, at the borders and the meeting points of nations. This results in a complex process of adaptation and creation, as a business firm needs to account for multiple languages, cultures, and nations at the same time. In these circumstances, implementing a successful language policy can prove difficult. Often, the language chosen is English, and BELF has begun to have characteristics of its own that can require its competency (Kankaanranta and Planken 2010, 400). According to Kankaanranta and Planken (2010, 382), the use of BELF in IB may also carry features of the employee’s native languages. English is commonly seen as the language of globalisation (Barner-Rasmussen, Gaibrois, and Wilmot 2024, 2) and it can be adopted in communication to signal belonging to an international community (Sanden 2018, 4). The next subchapter offers an alternative view of language use and ideology.

2.2.2 Multilingualism in business

Then, moving on from an ideology favouring only one language in business, the alternative should be considered as well. *Multilingualism*, in theory, is in contrast with BELF. According to Saulière (2014, 222), English can be used as more of a pragmatic choice than ideological,

as that is commonly a language that employees of firms have competency in. Saulière (ibid.) argues that using an “all-English” language policy may not always be more efficient or an economically sound option than multilingualism. He points out that the “English only” policies are not always fulfilled: “The reality behind ‘all-English’ [language policy] is thus functional bilingualism” (ibid.). Local offices tend to use their local language, and the languages may interact or even merge, thus despite a monolingual language policy, the reality can be functionally bilingual.

Organisations construct their language management based on the values and needs of the leadership or workforce. Multinational businesses balance between embracing or encouraging linguistic diversity and opting for one or more *official* languages. De Bres (2013, 131) points out that societies follow these ideologies as well, which in turn affects the language attitudes of the workers. Some view multilingualism in society as a source of opportunities, and some see it as a source of issues (ibid.). Additionally, people who are themselves multilingual view it more positively in their surroundings than those who are monolingual (De Bres 2013, 133). Employees bring these ideologies into the workplace, and as a result, societal language ideologies can be reflected in the language use of enterprises.

Thus, employing a multilingual approach to global business could offer new opportunities for language use. Janssens and Steyaert (2014, 624) propose the idea of a *multilingual franca*, which emphasises the possibilities of hybridity and flexibility in language use in international business. They point out that multinational enterprises are “spaces where individuals and groups are able to adapt to and recognize the differences among cultures by adopting and using multiple codes” (2014, 632). These codes refer to the mixed language use in global teams and the intersectionality of the identities in international organisations (Janssens and Steyaert 2014, 634). Still, according to De Bres (2013, 133), multilingualism can produce challenges in accessing information, exclusion, or misunderstandings due to limited language proficiency between people.

A previous study by Lønsmann (2014) addressed diversity and language ideologies in a multilingual workplace. One issue she points out in BELF and the ideology of using only English is that it puts non-English speakers in a disadvantageous position (Lønsmann 2014, 112). Although the study was conducted in Denmark, the results could apply to the Finnish context as well. Both countries have high English proficiency, but this may not apply to everyone on the individual level. Lønsmann (2014, 113) identifies situations where BELF and

the local language merge as “the meetings are ‘ideally English’” but include both languages. This can mean using slides in one language and presenting verbally in another (ibid.). This finding supports Saulière’s (2014, 222) argument of “functional bilingualism”. As such, balancing between multiple languages and language variations in IB proves complex and requires informed and thoughtful decision-making in language regulation.

2.2.3 Corporate communication through the lens of ideology

Selecting the language of communication fulfils one need, but corporate communication and language use entail many more dimensions. Another term relevant to this study, corporate *tone of voice*, is defined next. In their study, Oh and Ki (2019, 321) define tone of voice – or simply *voice* – as a style of typically online communication. The tone of voice refers to how the recipient of a message is addressed and what strategies the organisation uses to convey the message (ibid.). Commonly, it is used in the context of public relations and customer communication, but it can also refer to the tone in which, for example, the leadership of an organisation communicates to their employees. Corporate communication is strongly related to the overall nature of the organisation, that is, how the corporation wants to present itself in the society it exists in.

Communication strategies and tone of voice used by large corporations are related to *corporate social responsibility* (CSR), a term that has contested definitions, but generally, it refers to the responsibilities that multinational enterprises carry, such as obligations to stakeholders, social and ethical responsibilities, and managerial responsibilities (Maignan and Ferrell 2004, 4). A corporation must communicate about its CSR aspirations, for example, through image, brand, and marketing communications (Maignan and Ferrell 2004, 14). Language is, in this regard, crucial, which is where language policy comes into play. LP and related concepts will be inspected in the following subchapters.

The social aspect of multinational business cannot thus be ignored. *Corporate culture*, or the term culture itself, can be seen as encompassing ideologies within corporations. First, the term culture should be defined as it divides academic opinion across and within research fields. Schein and Schein (2017, 2) summarise the concept of culture as “learned patterns of beliefs, values, assumptions, and behavioral norms that manifest themselves at different levels of observability”. Culture, in general, is deeply embedded in language, and vice versa. Cultures can exist not as wide as nation-states but form in smaller social units as well, such as the cultures of ethnic groups or religions (Schein and Schein 2017, 13). These cultures can form

in any circumstance where a social unit has a common history and common practices (Schein and Schein 2017, 15). Thus, there is reason to argue that multinational corporations can develop a culture (Schein and Schein 2017, 9). Studying language policy sheds light on the general culture of the organisation, as the policy aims to direct the language use and interaction of the enterprise.

2.3 Language policy

Language policy could be considered at its very core an *intervention* to language use (Spolsky 2003, 8). Thus, language management and planning can be seen as closely related terms of policy in intervening with language use (*ibid.*). Kaplan and Baldauf (1997, xi) argue that the act of language planning leads to the establishment of language policy. Language policy and planning are often connected and referred to as a combination. The term *language planning* is characterised by the *act* of influencing language use. Then, language policy could be defined as “a body of ideas, laws, regulations, rules and practices” that aim to change language use in any way (Kaplan and Baldauf 1997, xi). In the next sections, different definitions and characteristics of language policy are examined and compared.

Spolsky (2003, 14) has developed ideas of language policy in multiple articles by proposing that language policy also encompasses ideologies and beliefs about language. These ideologies could be themselves considered language policy (*ibid.*). Spolsky (2003, 5) distinguishes three components that construct LP: language practice, language beliefs, and language management. Later, he also supplemented his definition with the dimensions of language activism and self-management (Spolsky 2018, 326). These components and definitions are employed in this study in the analysis of the UPM language policy. Next, a brief introduction to Spolsky’s theories on LP.

The first component, language practices, is the “actual choice of language varieties” that the speakers use (Spolsky 2018, 326). A language practice would be the concrete use of the language. It describes “the sound, word and grammatical choices that an individual speaker makes” (Spolsky 2003, 9). Second, language beliefs are the ideas and values assigned to languages and conceptions about language in general that can condense as ideologies (Spolsky 2018, 326), and these components are in constant motion, impacting each other. On the macro-level, language ideologies and beliefs affect, for example, the “appropriateness” of the languages used (Spolsky 2003, 14). Thus, Spolsky’s definition of language ideology is in

line with the definition by Seargeant (2009, 26) mentioned in 2.2, being a system of beliefs affecting language use on multiple levels.

Finally, language management refers to the concrete influencing and managing of language use by an individual, institutional, or authoritative force (Spolsky 2018, 326; see also Spolsky 2003, 5). Based on these definitions, the terms introduced in the previous section are closely interlinked with language planning as well. The two additional components that Spolsky introduced, activism and self-management, concern the power use and the possibilities of the individual in language management. With language activism, Spolsky (2018, 326) divides the advocates affecting language use into those with power and those without. Self-management refers to the efforts made by the individual to “modify their linguistic proficiency and repertoire” (ibid.). These two components are not central to this study but complement the deeper understanding of the dimensions of language policy.

In practice, language policy can be a spoken agreement or materialised in written documents. For example, the policy can be agreed upon in a casual discussion among a few people, or it can be documented in legislation. Implicit and explicit language policies refer to the openness of the measures taken and how they are documented (Lesk, Lavric, and Stegu 2017, 293–94; Johnson 2013, 10). This division can also be called formalised and non-formalised policy (Sanden and Kankaanranta 2018, 556). Implicit language policy can affect language practices indirectly or, for example, as a result of the social status of a language in society at large (Lesk, Lavric, and Stegu 2017, 294). Another way to express this would be that implicit policy is simply “left unstated” (Sanden and Kankaanranta 2018, 556). However, these types of language policy form a dynamic whole and often influence each other (Lesk, Lavric, and Stegu 2017, 295), and different policies can exist simultaneously.

Language policy research centres on the theoretical and practical domains of understanding language use in “social life” (Ricento 2006, 19). The language policy analyst must consider how widely language policies affect its societal context. According to Ricento (ibid.), “language policies are made, or are implicitly acknowledged and practiced, in all societal domains”. He continues that language policies in, for example, businesses “determine or influence what language(s) we will speak, whether our language is ‘good/acceptable’ or ‘bad/unacceptable’ for particular purposes” (Ricento 2006, 21). As such, the effects of LP are widespread and intertwined with its surrounding circumstances.

Many of these elements of LP apply to the language policies created in corporate organisations. Corporate language policy instructs the business firm it is created in. In recent years, multinational corporations have needed to “take a stand on the language and communication-related issues associated with attracting a group of linguistically heterogeneous employees” (Sanden 2020, 22) which has in turn increased academic discussion on the topic as well. Sometimes, depending on the size and influential reach of the organisation, the LP can affect wider contexts than just the specific company, like serving as an example for other firms or changing the language beliefs of its employees.

An interview case study by Sanden and Kankaanranta (2018) examined these non-formalised language policies in three Scandinavian multinational businesses. This case study is relevant to this thesis as they found that the level of formality and specificity of the LP can affect the experiences and agency of the employees in the organisation (Sanden and Kankaanranta 2018, 558). A non-formalised policy puts the “collective workforce” in the spotlight regarding decision-making, whereas a formalised policy places responsibility on the higher-level language planners and the strategy of the enterprise at large (*ibid.*). This study attempts to discern and analyse the “ecosystem” of language management and policy at UPM.

2.4 Classifying language policies

As seen in the previous section, language policy is multifaceted and complex both as a term and as a phenomenon. Based on the previous definitions and components of LP, a synthesised system of classification can be created. In Table 1, Johnson (2013, 10) distinguishes four ways of classifying language policy that are briefly discussed in this section. These classifications are applied to the UPM language policy in the Results chapter in a manner that allows for a deeper understanding of the dimensions of its LP. This theoretical understanding can be used in mapping the current and future language needs of the corporation.

Category	LP with higher visibility	LP with lower visibility
Genesis	<i>Top-down</i> Macro-level policy developed by some governing or authoritative body or person	<i>Bottom-up</i> Micro-level or grassroots generated policy for and by the community that it impacts
Means and goals	<i>Overt</i> Overtly expressed in written or spoken policy texts	<i>Covert</i> Intentionally concealed at the macro-level (collusive) or at the micro-level (subversive)
Documentation	<i>Explicit</i> Officially documented in written or spoken policy texts	<i>Implicit</i> Occurring without or in spite of official policy texts
In law and in practice	<i>De jure Policy</i> “in law”; officially documented in writing	<i>De facto Policy</i> “in practice”; refers to both locally produced policies that arise without or in spite of de jure policies and local language practices that differ from de jure policies; de facto practices can reflect (or not) de facto policies

Table 1 Modified model of language policy types by Johnson (2013, 10).

It should be noted that the distinctions made in this model can exist on a continuum and a policy can have elements from both dichotomies. For example, a single policy may include overt and covert elements, and multiple policies can exist or overlap simultaneously. The headings separating the categories based on the *visibility* of the language policy indicate that the two dichotomies have differing levels of availability, mostly referring to whether the LP is documented in writing. Differing classifications exist, and as noted before, this should not be considered absolute. Furthermore, the terms are relative (Johnson 2013, 10) and contextual. As Johnson (2013, 9) points out, the classification is not a framework but helps to understand the qualities of a policy. This classification is more of a tool for discerning the different features of the UPM LP.

Johnson (2013, 10) distinguishes two manners in which language policies often develop in an organisation or community: *top-down* and *bottom-up*. Top-down policies are set into motion by a “governing body”, such as the management of a corporation, and bottom-up policies are created by the communities or lower levels of an organisation at the grassroots level (ibid.). On the other hand, Thomas (2008, 320) notes that corporate language policy can also be created on an “ad hoc basis” and thus lacks the formal macro- and micro-level depth. This kind of policymaking has, however, been in decline in recent years as the importance placed

on international and multilingual communication has increased (Tenzer, Terjesen, and Harzing 2017, 816). Additionally, Johnson (2013, 10) makes a distinction between *de facto* and *de jure* policies. De jure refers to policies set in law and de facto to what is realised locally in practice (ibid.).

The overt and covert distinction in Table 1 refers to the *intent* behind the creation and execution of the policy (Johnson 2013, 11). For example, a covert policy can be a subversive response to an overt policy, where the overt policy is actively resisted (ibid.). The explicit/implicit distinction addresses similar characteristics but connotes the officiality of a policy. An “unofficial” language policy can control language use equally well as an “official” written policy document.

Lesk, Lavric, and Stegu (2017, 290) also place language policy in a wider societal context by dividing it into *macro-*, *meso-*, and *micro-levels*. In a doctoral thesis published by Bernhard Bäck in 2004, a three-level model on “factors of code” is described (Bäck in Lavric and Bäck 2009, 43). These three levels of Bäck’s model may affect the establishment of a language policy in an organisation (Lesk, Lavric, and Stegu 2017, 291). The macro-level refers to the wider economic and political elements at play (Lavric and Bäck 2009, 43). An example of this would be the state-level language policy of Finland, as the country recognises Finnish and Swedish as its two official languages (Ministry of Justice 2024).

The meso-level refers to both the language policy within an organisation and the common language policy practices in the industry (Lesk, Lavric, and Stegu 2017, 291). The micro-level is the concrete level of the individual employee and their interactions through language (ibid.). As such, many of these aspects of language policy apply to corporate language policy as well. Micro- and meso-level factors are of key concern in this study, while macro-factors, such as a state policy, can also influence the formulation of a language policy.

Corporate language policy is developed in its environment to serve the specific corporation regardless of its size. However, language policy as a phenomenon and a tool for language management still follows the same structures as in other contexts. Corporate language policy analysis and research are thus largely based on language policy analysis in general. In a business context, language policy can be implemented to manage and reduce language barriers within multinational enterprises (Feely and Hazing 2003, 39). These companies also need to standardise language use for straightforward internal communication and uniformity (Thomas 2008, 311).

Thus, the special linguistic environment of global business should be regarded. Grin, Sfreddo, and Vaillancourt (2010, 139) have demonstrated that including language in policies can create economic advantage (ibid.). Acquiring foreign languages could be seen as having a *non-market value* in business (ibid.). This type of value or advantage is elusive to measure where *market values* can be measured in costs and profits (ibid.). Non-market value affects a crucial part of human interaction and day-to-day work and influences economic results (ibid.). Then, language and language policy are connected to the economic performance of an organisation.

However, corporate language policy differs from, for example, education or state policies in that it responds directly to the language needs of the specific corporation (Lesk, Lavrig, and Stegu 2017, 272). As the corporation pursues profit and must maintain customer and stakeholder relations, the policy is formed accordingly. Language policy may also be embedded in or created in line with other corporate strategies in management (Karhunen et al. 2018, 986). This implies that “the language issue” is solely the task of management and higher levels of the organisation (ibid.), and the language policy, or strategy in this case, can be far removed from the lived reality of employees at lower levels. However, it does not mean that the language policy would not be functional or helpful in navigating multilingual situations on all levels of an organisation.

Lønsmann (2017, 103) connects language policy to the field of cross-cultural management. This type of management is required in international organisations (ibid.), as these organisations inevitably include people from different cultures. Language management and language policy are sometimes used synonymously, especially in economic contexts (Lesk, Lavrig, and Stegu 2017, 305–306). Language policy and management are in close connection with knowledge management and human resources management (Thomas 2008, 321). Thomas (2008, 322) argues that language and language management complement decision-making and, as such, would provide a “competitive advantage” to the business firm. Language policy is also related to the important advantages of knowledge management and transfer in IB (Thomas 2008, 322). Knowledge is both shared and created through language.

2.5 Interpretive language policy analysis

To study the connection between language policy and language practice (Johnson 2013, 154), we must first understand the language policy itself in detail. This can be achieved through interpretive language policy analysis (IPA). In this study, close reading is incorporated as a tool of IPA, as the researcher must position themselves into the research (Yanow 2000, 19). The

close reading is guided by the research questions and the principles of IPA. Although the theory applied in this study originates from policy analysis in general, it can be applied to language policy as well. Language policy can thus be understood from a multitude of perspectives, as well as mirroring the employee perspectives acquired through the survey.

Interpretive policy analysis originates from the twentieth century when policy analysts started to shift their attention to the more philosophical and anthropological dimensions of policymaking (Moore and Wiley 2015, 153). The position of the researcher has been a contested topic in research for decades (Wagenaar 2007, 311), and interpretive analysis emphasises the subjectiveness of the researcher's position. The interpretive approach emerged from shedding critical light on previously predominant empirical and objective methods in knowledge production and research (Wagenaar 2007, 312).

Interpretive policy analysis is connected to hermeneutic analysis, and its inherent objective is to create an *understanding* (ibid.). Social reality consists of actions in context and not “isolated facts” (ibid.), thus research should reflect this in producing and interpreting the surrounding world. Many aspects of policy analysis apply to language policy analysis as well. The purpose of this study is similar to the doctoral thesis by Tribble (2014, 71), to “compare and contrast the written documents to the perceptions of research participants regarding the actual implementation of policies on the ground”. This study uses in part the same interpretive policy analysis theory as Tribble (2014, 18).

The method of interpretive language policy analysis grounds itself in the “presupposition that we live in a social world characterized by the possibilities of multiple interpretations” (Yanow 2000, 6). Dvora Yanow has researched IPA, delved into interpretive research methods, and conducted organisational research in multiple publications (see, e.g., Schwartz-Shea and Yanow 2012; Yanow and Marrewijk 2010; Yanow 2015). Yanow (2000, 6) finds that policy research must connect itself to the lived human reality and its *sensemaking*. “Making sense” thus requires interpretation, and the knowledge gained from interpreting meanings is subjective (Yanow 2000, 7). According to Tribble (2014, 73), IPA focuses on the “deeper meaning of language policy” in such that it aims to understand the policy in its wider contexts. IPA is integrated with the classification of language policy on the concrete level.

Interpretive policy analysis is carried out by identifying and analysing five aspects related to the policy (Yanow 2000, 23). By pinpointing relevant features, the policy can be understood more holistically than strictly quantitative research might. Yanow names the discussions and

framing surrounding the policy the *architecture* of policy (2000, 21). By recognising and mapping the architecture, one can understand the policy itself. In the following paragraphs, the process of interpretive policy analysis is described. While the five steps of interpretive policy analysis may overlap and are interconnected, the steps are numbered for the sake of clarity in the analysis. The concrete methodology of this study is described in Chapter 3.3.

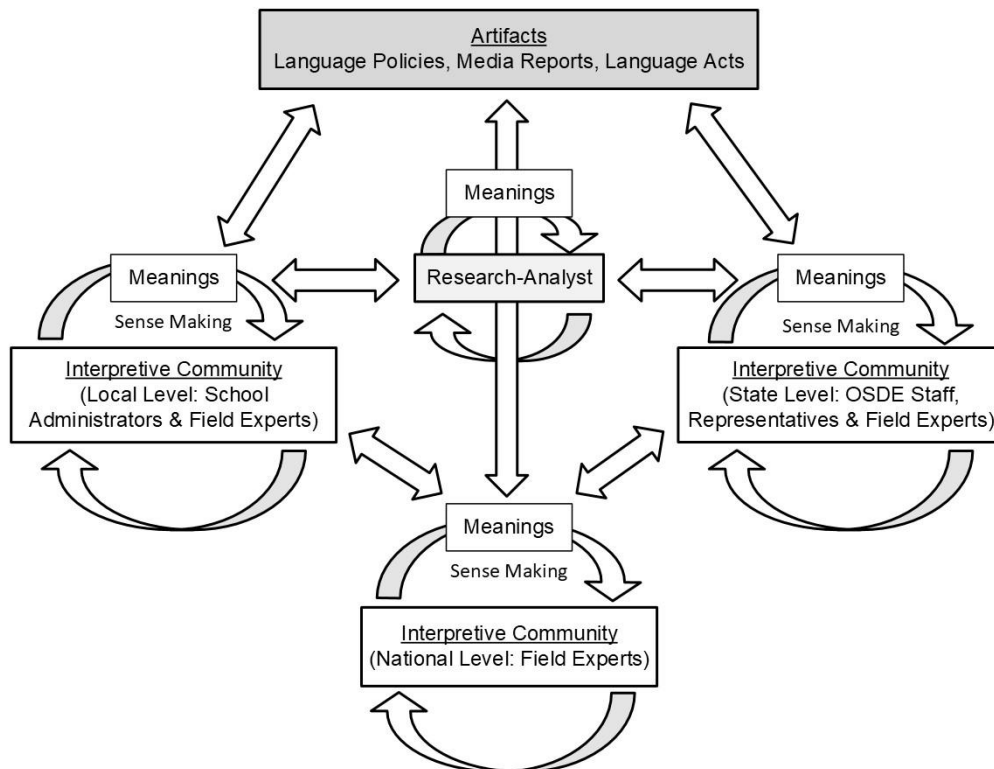


Figure 1 Recreated version of the “Interpretive Policy Analysis Web” in Tribble (2014, 92).

The steps of IPA can be applied to language policy analysis as well, as seen in the doctoral thesis by Tribble (2014). In Figure 1, Tribble (2014, 92) has synthesised the process of interpretive policy analysis. Interpretive policy analysis forms a “web” of meaning and sense-making, where the *researcher-analyst* must constantly remain moving between different interpretive communities and artifacts (ibid.). This constant state of flux allows for the researcher-analyst to expand their knowledge base and construct a comprehensive analysis. This analysis web will be utilised in presenting the results of this analysis in Chapter 4.4.2.

The first step of IPA is to locate the relevant actors and the affected groups of people, or the *interpretive communities* (Yanow 2000, 11). The interpretive communities possess “local knowledge” accessible only to the people involved in the policy process and implementation, as well as the people affected by the policy directly or indirectly (Yanow 2000, 20). The knowledge can be considered “local” despite the geographical location of the communities

(Yanow 2000, 18). According to Tribble (2014, 74), these interpretive communities are heterogeneous, and “[t]he perceptions, beliefs, and values of one interpretive community and individuals within each community may compete with, contradict, and/or reinforce that of other interpretive communities”. Examples of interpretive communities include makers of legislation, teaching personnel in an educational context, or, on the macro-level, the citizens of a country. In his analysis, Tribble (2014, 92) divides the interpretive communities based on the levels of the organisations, local, state, and national, as seen in Figure 1. The researcher interprets the circumstances and views of each interpretive community to form an informed understanding of the policy.

These groups are distinguished from each other based on the “understandings of policy ideas and language that would be different from other groups' understandings” (Yanow 2000, 27). These policy-related communities are “active constructors of meaning” (Yanow 2000, 18) thus they are not passive recipients of the legislation but create their own interpretations. The communities can also be multilocational and form in hybrid environments, as hybrid work has increased since the COVID-19 pandemic (Tavoletti 2023, 186). Language policy in an organisation concerns a large portion of its employees if not all. By extension, as LP directs the use of language within the enterprise, it also controls external communication towards, for example, stakeholders or customers. Commonly, internal communication refers to the information produced by the organisation to its employees, while external communication is associated with the content provided for entities outside the organisation.

In analysing the communities affected by the policymaking, special focus could be placed on the delegation of responsibility. Whom and what does the policy guide directly, and who is responsible for making the decisions on language use? This difference materialises in the language practices. The question above should be understood as how far the policy leads the individual or the community in decision-making and what is left uninstructed, unmanaged, or open to interpretation. Any discrepancies or vagueness in the policy leaves the individual responsible for their language choices. Of course, not every situation can or should be closely regulated, but ambiguity can create uncertainty and leave room for possibly preventable errors. The balance between regulation and free choice is challenging to reach but can prove fruitful if operations are optimised as a result.

Then, these communities formulate and interpret the purposes and tangible products related to policy, which are inspected in the second step of the analysis. According to Yanow (2000,

21), these *artifacts* “embody the more abstract meanings”, and they materialise as, for example, policy documents, texts, and the language used in them. The artifacts reflect the values and beliefs of the interpretive communities and, in turn, shape the conceptions regarding the artifacts (Yanow 2000, 18). Studying these artifacts allows access to the *meaning-making* of the interpretive communities, as the artifacts have a symbolic or representational relationship to their meaning (Yanow 2000, 14). The artifacts can also supplement the information received from the communities (Moore and Wiley 2015, 159). In the case of this study, the UPM language policy, website, and Code of Conduct are studied as artifacts.

The third step in interpretive policy analysis is recognising the *discourses* surrounding the policies. The term discourse entails the communities’ interpretations of the artifacts, and thus the meanings given to the artifacts (Yanow (2000, 21). Discourse as a field of research and as a phenomenon is complex, but in this context of IPA, it is referred to broadly as “language in use” (van Hulst et al. 2024, 4). The discourses of the different communities explain the surrounding world but also constitute “socio-political realities” (ibid.). Combining aspects of discourse analysis (Johnson 2013, 152) with language policy research is crucial in understanding the discussions and debates related to language policy. Yanow (2000, 23) defines identifying discourses in this context as finding “the specific meanings being communicated through specific artifacts and their entailments (in thought, speech, and act)”.

Yanow (2000, 18) also argues that the researcher-analyst themselves creates interpretations of the situation, and recognising this dimension of policy analysis is at the very heart of IPA. The researcher is thus part of the meaning-making and discourse related to the policy. Acknowledging and naming the different interpretations of policy may uncover deeper structures or conflicts within the communities involved. This third step helps the researcher understand the *meanings* of the actions of the community members (Yanow 2000, 20). Tribble (2014, 68–69) categorises the “apparent policy and artifact goals into [...] ideological groups”. This allowed him to connect the ideologies with the meanings of the language policy. As seen in Section 2.2, language ideologies are strongly interconnected with LP. Access to these ideologies is made possible by inspecting the concrete actions and artifacts of the community (Yanow 2000, 20).

The fourth step in IPA connects the interpretive analysis to ideology, recognising “points of conflict” between the communities, policies and discourses and reasons for them. Contrasting

viewpoints can be uncovered by inspecting the meanings given to the policy-related artifacts. Different groups and communities of people are likely to interpret matters differently and then assign differing meanings to policies (Yanow 2000, 21). These issues may also stem from ideological differences, as ideology and societal norms often affect how people perceive their reality (Yanow 2000, 16).

The fifth step in IPA is volitional, and one not always employed, *intervention*. This step allows the researcher to take on a more active role in the policy discussion. These actions can include negotiations or introducing differing viewpoints to each party (Yanow 2000, 22). This study does not strictly aim for a policy change, but the objective is to map an understanding of the policy and the parties related to it. Whether changes are carried out as a result is not within the scope of this study.

3 Material and methods

This chapter describes the UPM enterprise and the materials obtained from it. The UPM language policy, Code of Conduct, and website are the primary materials examined in this study, along with the survey responses. Understanding the business areas of UPM and its multinationality is crucial to conducting an effective analysis of its language policy. First, UPM is introduced in more detail, as well as the reasons why the corporation was chosen for the analysis of this study. Second, the survey is described. Last, as the IPA theory was introduced in Subchapter 2.5, its application in the context of this study is explained in Subchapter 3.3.

3.1 Selection of primary sources

To find a suitable corporation for the analysis in this study, business firms that were at least 30% foreign-owned as of 29th of February 2024 according to Euroclear Finland, were approached by email. To be classified as multinational, the corporations were filtered based on whether they had offices in and outside Finland. The list “Foreign ownership of shares issued” (Euroclear Finland 2024) was used as a reference as to how much of the firm itself was international and how much Finnish-owned. Thirty-six enterprises matched this criterion and were sent an invitation to participate in the study.

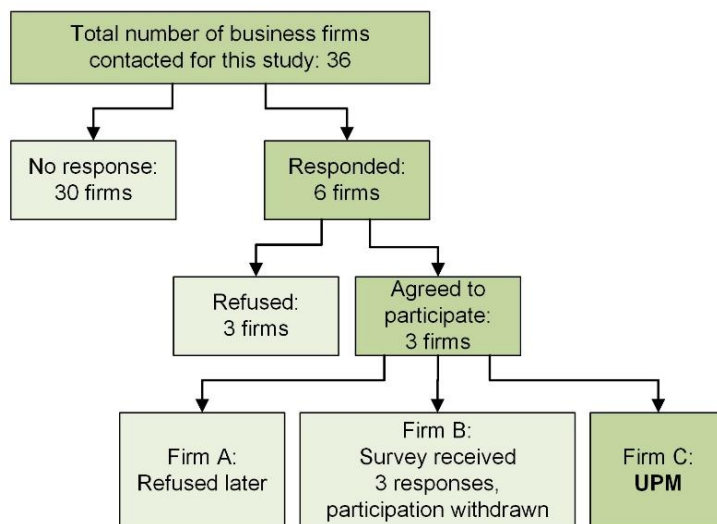


Figure 2 Tree diagram of the business firms contacted for this study.

The corporations were contacted in four batches of 8 to 11 firms between the 13th of April and the 10th of May 2024. Contacting the corporations in batches during the 2 months ensured a brief waiting period for possible responses before contacting more. The initial email included a request for the company’s language policy and an inquiry about willingness to distribute the

survey internally. As seen in Figure 2, out of the 36 enterprises contacted, six firms responded at all. Three firms expressed interest in participating in the study, and the other three politely refused. Firms A and B in Figure 2 were both withdrawn from the study. Firm A expressed interest in participating around the same time as UPM. However, after further discussion within the company, they decided to withdraw their participation. Firm B was sent the survey, but only three responses were received. The number of responses was not feasible for the purposes of this study, so the firm was excluded from this analysis. Thus, the two enterprises that expressed interest were excluded, and UPM was the sole focus.

3.1.1 UPM

This section introduces the subject of this study, as understanding the corporation is crucial to understanding its language policy. The current UPM-Kymmene Oyj was founded in 1996 when multiple smaller companies merged into one, but according to the company, it has “roots in the 1870s” (UPM 2024b). Presently, UPM is divided into six businesses based on the main products or materials the businesses manufacture (UPM 2024c): UPM Fibres, UPM Energy, UPM Raflatac, UPM Specialty Papers, UPM Communication Papers, and UPM Plywood. Additionally, the enterprise is divided into expert organisations called “Global Functions”, such as Human Resources, Marketing, Sustainability and Communications, and IT (UPM 2025). The corporation employs more than 15,800 people globally (UPM Annual Report 2024, 7) and presents itself as an interesting target for research on MNCs.

A brief account of the terms used about UPM in the study should be given. The multitude of terms related to different types of international businesses is vast. UPM refers to itself on the general level as a “bioeconomy enterprise” (Capiten 2019), and the enterprise is divided into the businesses listed in the previous paragraph. In this study, as well as research in general, the word *corporation* is also used to refer to an enterprise as a whole. Barner-Rasmussen et al. (2014, 886) describe multinational corporations as being “characterized by geographical, cultural, and linguistic fragmentation”. Then, the words *company*, *concern*, and *firm* are used as synonyms for corporation by UPM, but also for its subsidiaries. This is why the words corporation, enterprise, and firm are used interchangeably in this study, despite the nuances they present in meaning. The words company and business are used to refer to the subsidiaries and business areas of UPM.

Being a longstanding and globally expanding corporation, UPM has been a subject of public discussion in periodicals, and it has been studied in research from the perspectives of the

paper industry, environmental impacts, and work well-being, among others. Linguistic aspects have not received as much attention. However, Tukiainen (2004) has studied the reputation and societal responsibility of UPM-Kymmene through discourse analysis in their master's thesis. The thesis was done for the Turku School of Economics in the discipline of Management and Organisation. Tukiainen (2004, 9) inspected newspaper articles about UPM and how it has constructed its communications about responsibility and found that UPM targeted especially stakeholder groups and customers in its communication. Other bachelor's and master's theses have been published mainly in Finland on the aforementioned topics. UPM itself has also conducted research and founded research centres, such as the Biofore Base research centres. UPM also publishes its in-house magazine in multiple languages, the *UPM network*.

The relevance of this study is underscored by the current media landscape in Finland, which frequently discusses the forest and paper industry. In recent years, the business sector has received significant adverse attention for its environmental impact. Despite this, UPM positions itself as environmentally conscious and emphasises its dedication to responsibility and “next generation” growth. Whether UPM routinely follows this branding has been questioned in the media (Inkinen, Ritvanen, and Tuovinen 2024). On their website, the company highlights progress, innovation and sustainability (UPM 2024c). Additionally, UPM has articulated its stance on diversity, people, and other social values. The corporation has named its employees as “UPMers”. This social branding of the enterprise creates leverage for research.

3.1.2 The language policy of UPM and related documents

The UPM language policy is named “Language Guidelines for Global Communications”, but for clarity, it will be discussed as a language policy in this study. The terms *guideline* and *policy* can either complement each other or function as synonyms, but generally, guidelines refer to the more practical dimension of language policy (Logemann and Piekkari 2015, 34). In this study, the terms are used synonymously, as when enquired about the language policy of the corporation, the guideline document was provided by the company representative. Thus, one could determine that the company itself uses the “language guidelines” as language policy.

The document is two pages long directed towards the employees and available on the corporation's intranet. It contains 752 words and 4352 characters without spaces. It was

obtained from the company representative on the 29th of April 2024, and changes made to the document after that time have not been accounted for in this study. The body of the text is divided into five main headings, and the text under the headings is organised into paragraphs. The document contains regular prose text with one table listing out the corporate language used in which context. This will be examined in the Results chapter of this study.

In addition to UPM's language policy, its Code of Conduct is examined briefly in this study to understand the interpretive communities of the corporation. Code of Conduct is commonly known as CoC and is closely related to corporate social responsibility (CSR). The CoC of a corporation is a guideline for all interactions and operations regarding ethics and social responsibility (Erwin 2010, 535). Consequently, when directing human interaction, it should include linguistic and communicative elements. These could also be mirrored in the corporation's language policy and partially in the survey responses. While the CoC can be found in all 17 UPM languages, only the English version will be analysed in this study. The UPM CoC is publicly available on their website.

The Code of Conduct is a multimodal document in a slideshow or booklet format with 71 pages. It contains text and images sorted under relevant headlines. The CoC contains 8415 words and approximately 46 244 characters without spaces. The CoC includes a personal message from the CEO of the corporation, Massimo Reynaudo, that underlines the importance of the document and following the integral values of the MNC. The document addresses UPM's interests, from the environment to anti-corruption, and offers guidelines for how to conduct oneself in various situations. The CoC concerns every employee of the enterprise without exception. Along with text lists and other graphic elements, almost every page has a related photo or illustration.

The UPM website is also closely linked to the CoC and a direct manifestation of the enterprise's brand, image, and external communication in general. The website (UPM.com) will also be included in the analysis of this study, especially in providing background information. The articles, statements, and overall language used on the website are examined to understand the communicative style of the corporation. Special focus is placed on the "Sustainability" and "About us" sections of the website.

3.2 The survey

According to Tenzer, Terjesen, and Harzing (2017, 826), surveys and questionnaires are the most common sources of data in language-related IB research. Using a survey as a tool is efficient in unveiling employee perceptions, values, and beliefs. These views are then mirrored and compared with the results of the interpretive policy analysis introduced in 2.5. The survey responses and the language policy of UPM are the primary source of material and data for this study. The survey was conducted anonymously and only collected the data necessary for this study. The survey did not ask for personal information that would allow for identifying singular employees. However, some background information was collected, such as how long the person had worked in the company, their age and gender, and their native language. This allowed for a comprehensive understanding of the respondents as well as finding possible differences between age groups or genders. The time the person had been employed in UPM is crucial information, as there could be a correlation between the number of years worked in the company and the degree of understanding of its language policy.

The survey consisted of 16 questions, out of which eight were mandatory and the rest either optional or supplementing the other questions. The survey contained five open-ended questions, and the rest were multiple-choice. The survey questions both in English and Finnish can be found in Appendixes 2 and 3 respectively. The survey was published in both languages to ensure that the Finnish and international UPM employees could access it. The survey was conducted online via the survey software Webropol. Before sending out the survey, UPM was given the opportunity to review the questions and potentially add their own, but no changes were proposed. UPM was also asked to send follow-up reminder messages to the possible participants throughout the time the survey was open. This would ensure that everyone who wanted to reply had the opportunity to respond despite busy schedules.

Survey studies must pay close attention to ethical issues, as they can gather personal and private information relatively easily and quickly. The questions need to be formulated in a manner that is clear and non-invasive. Participation must be anonymous, optional, and well-informed. In this study, this was ensured with the Privacy notice linked on the first page of the survey. The privacy notices in English and Finnish can be found in Appendices 2 and 3 respectively. This notice included the data protection information in accordance with the Finnish Code of Conduct for Research Integrity that the University of Turku is committed to. This meant conducting the survey and the analysis of this study according to the principles of

research integrity, which are “reliability, honesty, respect, and accountability” (Finnish National Board on Research Integrity TENK, 2023). These principles have been accounted for by being transparent about the aims of this study and collecting only the necessary information from the respondents. The reliability of this study was ensured by being clear about the use of methodology and aiming for repeatability while acknowledging the subjectivity of interpretive analysis.

The questions of the survey were created loosely based on the interview prompts of a case study by Barner-Rasmussen, Gaibrois, and Wilmot (2024, 10) and another study by Barner-Rasmussen et al. (2014, 904–905). These studies were introduced in Section 2.1. Barner-Rasmussen, Gaibrois, and Wilmot (2024, 10) focused on language ideologies and how languages impact employees, which is reflected in this survey as a question, “How often do you find yourself in work-related multilingual situations where you would not manage with only your native language?” The aforementioned study also guided the collection of background information about the respondents, such as choosing to ask about the respondents’ time spent with the corporation, their personal language history, language requirements in their recruitment, and language use in work-related situations (Barner-Rasmussen, Gaibrois, and Wilmot 2024, 10).

Additionally, the employees’ attitudes towards language policy were surveyed using a *direct approach* (Garrett 2010, 37). Direct approach in this context refers to how language attitudes can be asked about directly and explicitly (Garrett 2010, 39). Garrett (2010, 37) introduced a study by MacKinnon (1981) titled ‘Scottish opinion on Gaelic’, which included a questionnaire of 16 questions mapping the language attitudes of Scottish people. For example, one question was “Do you think that the Gaelic language is important for the Scottish people as a whole?” (MacKinnon in Garrett 2010, 38), which was mirrored in this survey as “How satisfied or dissatisfied are you in your organisation's current language policy?” Through this direct manner of questioning language attitudes, the values and attitudes of the respondents could be accessed. An *indirect* approach refers to the formation of questions more subtly (Garrett 2010, 41), and it has also been employed in this survey, for example, in the question “Was language competence or skills a requirement or desired when you applied for this job?” This way, the possible language policy of the organisation could be unveiled indirectly, as language requirements are commonly considered part of the LP.

3.2.1 Interview with UPM about the survey

A short interview with a UPM representative was conducted via an online video conferencing platform prior to conducting the survey. The UPM representative was the primary contact between the researcher and the enterprise, and they worked in a managerial position. The interview lasted about 30 minutes and provided valuable background information about the language policy of the enterprise and its employees. The interview was semi-structured, as some questions were premeditated, and the themes of the discussion were decided beforehand. The guiding themes of the interview can be found in Appendix 1. However, the discussion was freeform and casual, as the purpose of the interview was to increase knowledge about the enterprise and to inform the representative about the structure of this study. The exchange of information enabled a mutual understanding of the study and the primary data.

According to the interview, the UPM workforce has strong internal mobility internationally, and the employees move between countries. As a result, the enterprise is evidently multilingual, although it is not possible to distinguish how many languages are spoken by individual employees at work or privately. In addition to the valuable background information, the interview also produced some background data in terms of the history and structure of the company's LP. The language policy was initially proposed by the communication team to the executive branch and then, after approval, introduced to the wider community within the enterprise. The information retrieved from the interview will be used in the Results chapter to complement the information acquired from the UPM language policy itself and the Code of Conduct. While the interview answered many questions about the enterprise, it left room for interpretation as well. This will be studied in Chapter 4 in detail.

3.2.2 Language policy in the survey

The definition of LP included in the survey had to be concise and include intersecting and related terms for clarity. Defining language policy for the survey was crucial as there are many conceptions of the term in research and practice, as seen in Chapter 2. The definition used in the survey was loosely based on Table 1. It included examples of language policy domains and uses with special regard for how the policies may actualise in practice. Based on the definitions discussed in Chapter 2, language policy was described in the survey itself as follows:

The term language policy includes the regulation, management, and practices regarding language use.

For example, they regulate how offices in different countries communicate with one another, **the common corporate language**, or how one should communicate to customers. These policies can be written or spoken, and they also be official or unofficial.

Language policy inevitably includes the use of power and controlling boundaries. Language policy can affect multilingualism and culture and prevent the occurrence of language barriers. Language policy is especially needed in multinational enterprises to create coordination and cohesion.

Terms such as *communication*, *official*, and *coordination* were used because these terms appeared in the UPM language policy. Then, terms like *culture*, *language barrier* and *multilingualism* were used to draw attention to sociological and ideological dimensions of the language policy. As Thomas (2008, 310) notes, language policies are usually made to reduce language barriers in organisations. These wordings and statements were deliberately selected for these purposes, even though they may have affected the respondent's views or answers.

3.3 Methods

This study employs a mixed methods approach, and it is mainly based on qualitative analysis. The interdisciplinary frameworks used in this study help discover close details about the material collected for this thesis and allow for a comprehensive analysis. As a qualitative case study, this thesis aims to identify both the *common* and the *uncommon* about the specific circumstances of the “case” of the study (Stake 2005, 447), that is, UPM's language policy. This means drawing data from and studying thoroughly the particularity, setting, context, and informants related to the case (*ibid.*). The case of UPM's LP can then be understood, and the research questions of this study can be explored.

1. How does the individual employee perceive the UPM language policy?
2. How does UPM articulate its language policy?
3. What could the company consider in developing this policy further?

To answer the first research question about the employee perspectives, the survey was employed. The survey responses are analysed in detail and arranged thematically in the Results chapter. The data gathered from the informants is compared to the information gained from the LP itself and based on the interview. The second research question explores how UPM regulates language use within the organisation and is answered through policy analysis. First, the policy is classified based on Johnson (2013), and then the language policy is

analysed in more depth with Yanow's framework of interpretive policy analysis (2000). The IPA framework is the main methodology of this study as much of the analysis is based on understanding language policy within and outside of its immediate context. To understand the functionality of a policy, one must understand the communities it affects and the artifacts related to it. The language policy was read through carefully and annotated, and the close reading and studying of the related documents allowed for an in-depth analysis.

The third research question about the prospects of developing the policy further will be examined in greater detail based on the results of the first two questions in the Discussion chapter of this study. With these steps, the current language situation within UPM can be understood, and the knowledge can be applied to the future development of multinational and multilingual organisational language policies. However, using the case study as "interpretive sensemaking" (Welch et al. 2011, 747), this study does not aim for a holistic explanation or a singular answer but a detailed description of the situation. Parts of the analysis are equally entwined and the information gained from each section supplements each other.

4 Results

This chapter presents the results of this study. The main foci are the language policy and related documents and how the survey results reflect them. The language policy will first be analysed by close reading and finding substantial details from it. Secondly, it will be categorised based on the classification of Johnson (2013, 10). This will enable a thorough understanding of the policy and will later complement the IPA. The survey results are analysed before the interpretive policy analysis, as these responses complement especially the latter part of the analysis. The themes that arise from closely examining the documents are discussed through IPA. The order of the subsections in the interpretive policy analysis follows the order of Yanow's IPA, artifacts, communities, and discourses. Lastly, the possible ideological connections will be inspected briefly. The analysis will continue into the Discussion chapter of this thesis, connecting this analysis to the wider networks at hand.

4.1 Close reading of the UPM language policy

The name of the UPM language policy, “language guidelines”, reflects in itself certain beliefs and conventions of LP development. The document is not named explicitly *language policy* but functions and is understood by the company representative as such. This word choice, while conveying the meaning and purpose of the document, implies to some degree that the policy may not have originated from language planning, but from practice. The practical need for language policy often stems from trial-and-error circumstances, as noted by Thomas (2008, 320) in Section 2.4. While this approach may result in a functional and understandable LP, it can also generate limitations in language policies or practices. Language policy also exists as a preventative measure for possible mistakes or contradictions in language use.

UPM establishes hierarchies between languages within the policy: two official company languages, a primary language, and “major languages”. English and Finnish are the official languages, and English is the primary (Example 1). The major languages are based on the main business areas of the enterprise, and they are Chinese, German, Spanish (Latin American), and Polish. This listing of languages is presented at the very beginning of the document in table format. The hierarchical division of languages is typical and may reflect ideological beliefs, which will be discussed further in 4.5. The major languages are used when material needs to be shared with a wider audience internally, as seen in Example 2. Then, when communication with production plants is necessary, UPM adds four more languages to

the list: Estonian, French, Malay, and Swedish (Example 3). Additionally, it should be observed that the language policy of the enterprise exists only in English.

- (1) All globally relevant news or news that can be shared for several purposes are published in both English and Finnish on the chosen channels. As a rule, English is considered the primary language and Finnish the translation. (UPM Language Guidelines)
- (2) [T]he **major languages** to communicate news with corporate wide relevance, i.e. the news that reach the majority of UPMers. If the topic requires communications to production employees, all 10 languages should be used. (emphasis added; UPM Language Guidelines)
- (3) Languages when communicated to production employees: Official and major languages, Estonian, French, Malay, Swedish. (UPM Language Guidelines)

UPM has outsourced most translations to an outside translation firm. This is a common practice, as “imposing a common corporate language [...] does not remove the pressure to translate and adapt meaning to local context” (Logemann and Piekkari 2015, 36). Despite establishing official and major languages in its LP, UPM must still assimilate into local contexts. It should be noted that when functioning at a crossing point of cultures, equivalence cannot always be attained (Chidlow, Plakoyiannaki, and Welch 2014, 573). Emphasis on cultural understanding of translation and language use has increased in recent years, especially in translation studies (*ibid.*).

According to the interview with the UPM representative, the employees themselves do translations or write directly in a language that is not their native language, namely in English. The interview with the UPM representative serves as a source of background information, and it is not analysed. The background information is crucial for understanding the origins of the language policy and the community it has been created to instruct. Based on the interview and the reading of the LP, it could be deduced that the LP contains implicit information and knowledge.

To understand the policy, the following initial observation must be made. Either this language policy document is the only LP the entirety of the enterprise has, or as stated in the policy (Example 4), the responsibility is shifted onto the singular businesses, and they have established their policies individually. The word “responsibility”, referring to the responsibility of the unit or individual producing content, is mentioned ten times in the relatively short document. However, as seen in Example 4, the news releases of the functions are still coordinated with the Communication and Brand team, which has created the LP being

examined here. This could indicate that the *businesses* have their own communication branches, and the *functions*' communication is consolidated to the Communication and Brand team. The process of delegating the responsibilities within the corporation is not specified in the language policy document.

- (4) Each business is responsible for producing and publishing its own news releases. [...] Functions' news releases are coordinated and published by dedicated persons in UPM Communications and Brand team. (UPM Language Guidelines)

4.2 Classification of the language policy

Returning to the LP classification introduced by Johnson (2013, 10) in Section 2.4, the UPM language policy could be classified as indicated in Table 2 below. Upon close inspection, many aspects of the policy are multifaceted. The classification is done as follows: first, the policy document is analysed as such, and then the concrete language practices are speculated. The observations made by close reading the document in 4.1 support and guide this classification. It should be noted, that although the model presents a dichotomy, it is not absolute, and the language policy can, in many cases, fall in between the categories.

Category	The language policy of UPM
1. Genesis	<i>Top-down</i> Macro-level policy developed by authoritative body or person
2. Means and goals	<i>Overt</i> Overtly expressed in written policy texts
3. Documentation	<i>Explicit</i> Officially documented in written policy texts
4. In law and in practice	<i>De jure Policy</i> "in law"; officially documented in writing

Table 2 Classifying the UPM language policy based on Johnson (2013, 10), numbering added.

Next, the categorisation of the UPM language policy is explained in the order of the numbering in Table 2. The first category is the genesis of the LP, which is potentially the most challenging to distinguish. According to the interview with the UPM representative, the policy was created based on the existing needs of the organisation, and they explicitly considered it to have been created bottom-up. However, the unit and team that created the policy were of authority and in a managerial position. Thus, the policy was not generated by the exact community it impacts, but it did develop adjacent to it and was not directly handed

down from an entity that would have been entirely detached from the communication branch. Whether the policy arose from top-down or bottom-up could be interpreted either way based on the understanding of the internal power structures and positions in the enterprise. Still, in the context of this classification, the policy can be seen as top-down and having been created on the macro-level.

Second, the means and goals of the LP are examined. Based on the close reading of the document, the UPM language policy is overtly expressed and compiled into a single, succinct document. However, this distinction is not crystal clear either, as the title of the document is not explicitly policy but “guidelines” instead. The intentionality of the word choice is unknowable, but the implications can be read. The policy is not fully overt and unconcealed, as the policy leaves gaps in the practical implementation and the differences between the functions and businesses of UPM. Any possible verbal agreements or spoken policies are also left out of the policy document and thus are out of reach for this analysis. If each business has its language policy, but the aim is to have unified communication enterprise-wide, it could be mentioned in the larger-scale guidelines document to ensure clarity between the businesses of UPM.

The third part of this analysis examines the explicit documentation of the LP. As seen in the description of the LP in Chapter 3.1.2, the policy is documented clearly and can be considered official. However, having a written explicit policy does not rule out the possible existence of implicit or spoken policies. Policies “occurring [...] in spite of official policy texts” (Johnson 2013, 10) are difficult to detect and would require extensive analysis and involvement within the company from the researcher, for example observing the businesses for a longer period.

Fourth, the “in law” and “in practice” distinction is investigated. As the distinction centres on the realisation of the LP in practice, this is a dimension of the classification that is harder to reach. As noted before, the UPM language policy is officially documented, but it does draw from the de facto dimension of LP. The language practices of UPM were produced from the “local” language practices. Locality in this context refers to the corporate environment and the very community that realised the need for an official de jure policy. Additionally, an interesting observation can be made on the implied existence of separate language policies within the businesses in UPM. As the responsibility and power are placed on individual businesses and regions, the question arises: how is language managed in those environments?

Depending on the answer, there is reason to believe UPM also employs de facto policies, that is, policies that surface despite de jure policies.

- (5) Dedicated content owners are responsible for updating and managing the content.
- (6) [T]he content owner is responsible for producing and publishing the news release in appropriate external and internal channels.

Statements in the LP seen in Examples 5 and 6 imply that the LP in question does not provide concrete courses of conduct. Responsibility from the managerial positions of the communication branch is delegated to the lower levels. Despite the communication branch of the enterprise being most likely the primary audience and user of the policy, communication inevitably inhabits every level of an organisation. This is why analysing and classifying even a relatively short policy document can prove to be multifaceted and equivocal.

4.3 Survey responses

So far this chapter has discussed the UPM language policy, and it is now necessary to turn to the survey results which will both corroborate the findings of the language policy analysis and offer valuable insights into employees' perceptions. The survey was circulated within the communication branch of UPM, which included approximately 140 employees at higher levels globally. Out of this group, the survey was opened 29 times, and 12 employees completed it. The survey was open from the 29th of April to the 25th of May 2024. The main interest regarding the survey is seeing whether the employee responses reveal anything new or conflicting about the LP of the enterprise or the related documents analysed further in Subsection 4.4.1.

To gain an understanding of the participants of the study, the questions concerning background information (questions 12–16) are analysed first. Then, the questions are inspected in thematic order from knowledge about the corporation's language policy in general to opinions about it and language use in UPM overall. The questions are related to and complement each other. Please refer to Appendixes 2 and 3 for the English and Finnish survey questions respectively. Examples from the survey responses in Finnish are translated into English, and the back translations are provided in square brackets after the examples.

Although the UPM representative communication branch expressed interest in participating, the response rate was relatively low. For example, in their meta-analysis on online surveys in

educational research, Wu, Zhao, and Fils-Aime (2022, 10) found that the mean response rate is 44.1% across 1071 online surveys. While the response rates may vary between research fields, their analysis nonetheless presents an average based on a large sample size. It is to be expected that surveys are completed at the pace of the individual, and participation is not always possible in a certain timeframe or due to workload. This study did not offer the participants any personal reward for participation.

The willingness of an enterprise to participate in an LP-related study can be seen as a result in itself. Interest in participation requires at least some level of knowledge of language policy, and most importantly, interest in *language* in general. The survey was open for a month, and those who were interested in responding had reasonable time to complete it. Reminder messages were agreed upon to be sent out a few weeks before the survey closed or at least a week before. However, there is no guarantee that reminder messages were sent out, as all the responses received were from the first 2 days it was open.

Firstly, some background information collected in the survey about the respondents should be discussed. The survey asked for background information from the respondents, such as their age and gender (Questions 13 and 14). Had the sample group been larger, differences between these variables could have been compared. Since the number of responses did not exceed 12, analysing the open-ended questions proved more fruitful. Moreover, the data provided by those two questions is not included in this analysis to fully ensure the privacy of the participants. Questions 15 and 16 enquired about the respondents' native language, and most were Finnish speakers: Finnish: 9, Swedish: 1, and Other, specified German: 2. Additionally, Question 11 did not provide many perspectives as it was an open question about general feedback on the survey.

The time the respondents had worked in the enterprise was asked in Question 12, and all had been part of the corporation for more than 6 months, which can be observed in Figure 3. This does not describe the length of their career but shows that all had been working for specifically UPM for a while. Thus, most participants had had time to complete their onboarding in the enterprise and possibly get acquainted with the policies and practices specific to this corporation.



Figure 3 Question 12: "How long have you worked in this organisation?"

The first question of the survey addressed language use on a general level to orient the respondents into language-related thinking: "How often do you find yourself in work-related multilingual situations where you would not manage with only your native language?" Out of the twelve respondents, all reported they navigate work-related multilingual situations often (4) or always (8). If the employees used other languages than their native in their daily work, language policies would be relevant to them, too.

Then, the second question inquired about their knowledge of the UPM LP. As seen in Figure 4, two expressed that the organisation did not have an explicit and written LP, while five employees believed the enterprise has at least some language policy and the other five that UPM had an explicit and written LP. The definition of language policy introduced in Section 3.2.2 was attached to the second question in the survey. Thus, it is likely that the definition affected the responses, at least to some degree. This influence should be evaluated critically but being a multifaceted and complex term as well as a field of research, a definition had to be provided to ensure an equal level of understanding for the respondents. Even in the corporation's communication branch, reflecting language use on a policy level may not be topical or familiar to everyone. The LP definition was tailored to fit the context of UPM, and the possible influence of the definition is acknowledged in this analysis.

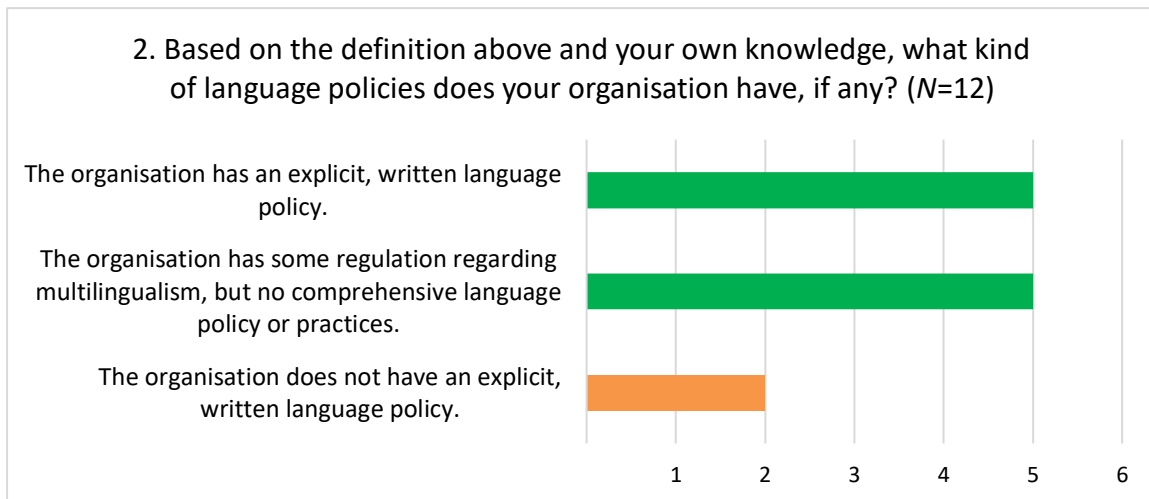


Figure 4 Question 2: “Based on the definition above and your own knowledge, what kind of language policies does your organisation have, if any?”

One manifestation of language policy, and perhaps the most visible to many people, is the language requirements expected from employees during the hiring process. Language competence is commonly mentioned in both resumes and during interviews. Questions 6 and 7 addressed these requirements: “Was language competence or skills a requirement or desired when you applied for this job?” and “What kind of language requirement(s) were there?” Most respondents (92 %) reported that language competence was required or desired in recruitment. Ten respondents reported that English language skills were a requirement for getting hired. It should be noted, however, that the employees’ positions within the company were most likely of higher level. In addition to English, four mentioned Finnish, and two disclosed that German was considered an advantage. In the survey itself, four respondents used English, and the rest used Finnish in answering the open questions.

Question 9, “Is there a specific corporate language in your organisation?” produced similar answers as 11 respondents mentioned English, and two mentioned Finnish in addition to English. Most respondents mentioned only the primary language of UPM, English, perhaps since the question asked for language in singular. The surface-level language policy is understood and seems to be working well, as only one person disagreed on the existence of a corporate language.

When asked about their satisfaction with the language policy in Question 3, eight participants selected that they were satisfied, and four were neither satisfied nor dissatisfied, as seen in Figure 5. This exhibits overall satisfaction with the LP of UPM. It should be noted that a questionnaire circulated by the management of an enterprise may affect the respondents’ willingness to fully express their opinions. Question 4 was set to appear only when a person

expressed neutrality or dissatisfaction in the previous question. Examples 7 and 8 show the two respondents' views elaborating on why they chose "neither".

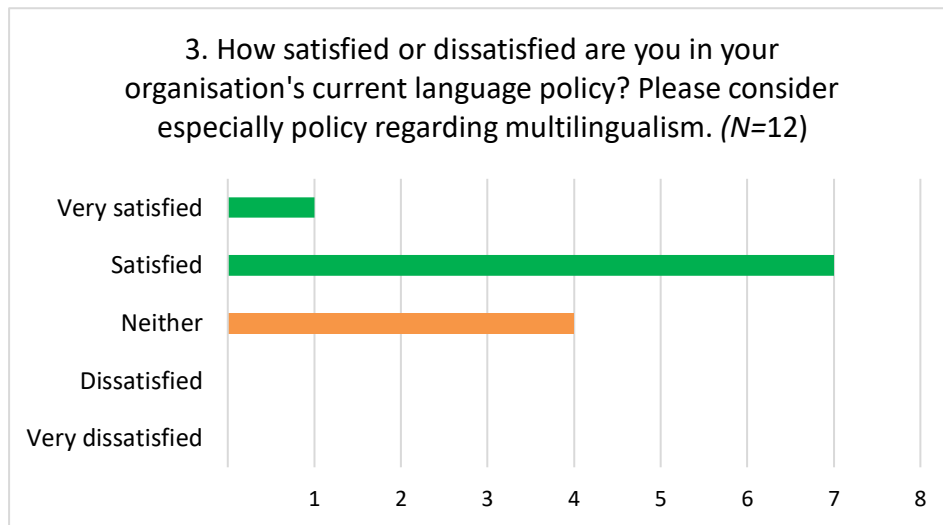


Figure 5 Question 3: "How satisfied or dissatisfied are you in your organisation's current language policy? Please consider especially policy regarding multilingualism."

- (7) Meillä ei mielestäni ole tehty mitään selkeitä linjauksia ainakaan organisaation sisäisessä kommunikaatiossa käytettävien kielten suhteen. [I don't think we have any clear policies, at least in terms of the languages used for internal communication within the organisation.]
- (8) Usein tärkeitä sisältöjä on tarjolla vain englanniksi vaikka UPM:llä on suuria tehtaita muillakin kielialueilla. Microsoftin työkalut tarjoavat kätevän tavan kääntää tekstejä eri kielille, mutta tämä mahdollisuus ei aina riitä. [Often important content is only available in English, even though UPM has large mills in other language areas. Microsoft tools offer a convenient way to translate texts into different languages, but this is not always enough.]

Example 7 states that no clear policies have been established regarding the languages used in internal communication. This, however, is contradictory to the policy statements found through the close reading in 4.1 that state the official languages of the organisation. The reason for this inconsistency is unknown, highlighting the need for clarity and uniformity to ensure coherent communication. Example 8 then exhibits that employees translate texts themselves despite the enterprise having outsourced translation to an outside translation firm. Using machine translation and tools is mentioned to be beneficial in translation. This view was supported by the interview with the UPM representative. During the interview, it was pointed out that skills in translation and languages are commonly needed within the communication branch.

The importance of translation and the effects of machine translation are brought up multiple times in the responses. In Question 8, “In your opinion, how is language management realised in your work? Are the policies relevant to your work?” nine participants shared their views. Language management has been defined in Section 2.3 as any effort to regulate language beliefs or practices within a specific organisation (Spolsky 2018, 326). The question elicited significant variation in the situations the participants brought up in their responses. In Example 9, a participant emphasises inclusion through translation and how important it is to have content in one’s native language instead of the use of a lingua franca, presumably English. Example 10 then follows a similar logic and places the responsibility of translation on the person or entity that produces or forwards the material. Although the corporation has two official languages, the respondent alludes to an “expected internal language” (Example 10). Both the respondents mention AI translation as a useful aid in translation.

- (9) Laajemmat koko konsernin kannalta tärkeät aineistot käännetään, joissan [sic] vähemmän kriittisissä vastuu jää enemmän maakohtaisille toiminnoille. Tarve omalla äidinkielellä olevalle informaatiolle ja sisällölle on merkittävä, joten **jos kaikki halutaan mukaan niin kääntäminen on sen edellytyksenä.** Inklusion kannalta on tärkeää että materiaalia on eri kielillä. Nykyään tekoälyavusteiset kääntäjät onneksi auttavat, nopeuttavat ja tehostavat merkittävästi aineiston kääntämistä. [Materials important for the entire corporation are translated, while responsibility for less critical ones remains more with country-specific operations. The need for information and content in one's native language is significant, so **if everyone is to be included, translation is a prerequisite.** For inclusion, it is important that material is available in different languages. Nowadays, AI-assisted translators fortunately help, speed up, and significantly enhance the translation of materials.] (emphasis added)
- (10) With a language policy in place I would expect that front end person translate requests, customer feedback or inquiry into the expected internal language. [...] Even in times of AI it would be kind and friendly if the native one translates and checks if everything is ok.

The respondents mentioned both challenges in language use and the policies themselves. Culture, inclusion, and multilingualism were all brought up in multiple answers. The considerable global mobility of UPM’s workforce was reflected in the survey answers, as the participants pointed out situations where they had to navigate communication between people speaking different languages. The possibilities of multilingualism are brought up by a respondent in Example 11 but notes that they are not realised for non-Finnish speakers. In Example 12, another participant comments on a similar issue with the language barriers that

form with two official languages and multilingual situations, especially noting immigration and integration into the Finnish-speaking workplace.

- (11) Multilingualism is supported and respected in most cases, Finnish to some extent still required which limits the possibilities [sic] for multilingualism to full extent as non-Finnish speakers not always have same opportunities
- (12) Englanti yrityksen virallisena kielenä antaa selkänöjää vieraskielisille tilanteissa, joissa muut paikallaolijat puhuisivat keskenään suomea. Työskentelen päivittäin sellaisten ihmisten kanssa jotka eivät osaa suomea. [...] Haaste on maahanmuuttajan suomenkielen osaamisen parantaminen, kun asioiden edistämiseksi hänen kanssaan täytyy puhua englantia. [Having English as the official language of the company provides support for non-native speakers in situations where others present would speak Finnish among themselves. I work daily with people who do not know Finnish. [...] The challenge is improving the immigrant's Finnish language skills when it is necessary to speak English with them to advance matters.]

In response to the same question, one respondent pointed out that language is connected to culture, which should be considered in communication: ”Kieli on kulttuurellinen asia niin pitää osata ottaa erilaiset tavat ilmaista asioita myös huomioon” [language is a cultural matter so you must be able to take into account the different ways of expressing things]. It was noted in four responses that English is adopted as the common language once the situation involves non-Finnish speakers. One participant identified a pattern in the corporate culture: “It's part of the corporate culture to speak English as soon as there is one person not understanding Finnish or whatever other language.” This implies the existence of an implicit language policy embedded in the corporation's internal culture and reflects the ideology of English as a *lingua franca*. This aspect of corporate culture alleviates language barriers and has evidently formed within UPM outside of the *de jure* language policy.

In Question 5, “How would you improve the language policies in your organisation?” four respondents mentioned possible “improvements” for the current language policy of the enterprise. Based on this analysis, a clear theme was the issue of reaching the process and the factory workers in production plants. This is directly related to the recognition of the interpretive communities in the IPA to be analysed in Subchapter 4.4.2. Reaching the community of process workers seems to be challenging within the enterprise, which is expressed by a respondent in Example 13 below. The participant also mentions that the tone of communication used in each region could be defined more clearly. This is a valuable observation and something that could be considered when aiming to reduce uncertainty in the language use and communication of the corporation. Finding the right degree of “officialness”

or approachability in the communications of a large international corporation can be challenging.

- (13) Ihmiset kaipaavat informaatiota ensisijaisesti omalla äidinkielellään, etenkin tehdas- ja tuotantotyössä, jossa englannin kielen osaaminen ei välttämättä ole niin yleistä. Olisi hienoa, jos kullakin kielialueella oli selkeämmin määritelty joku henkilö, joka olisi vastuussa/valtuutettu käyttämään työaikaa materiaalien kääntämiseen tai käännösten tarkastamiseen. Ja esimerkiksi sen linjaamiseen, kuinka virallisella sävyllä kullakin alueella viestitään, jos konsernin linja on suhteellisen rento sävyllään. [People need information primarily in their mother tongue, especially in the factory and production work where English may not be as widely spoken. It would be great if each language area had a more clearly defined person responsible/authorised to spend time translating materials or checking translations. And, for example, to align how official the tone of communication is in each region, if the corporate tone is relatively casual.]

The tone of voice of the corporation is also brought up directly, as seen in Example 14, which could indicate a need for discussing it on the policy level. The concept of corporate tone of voice has been introduced in Subchapter 2.2.3. The tone of voice described on the “high level” is unknown in this context, as the language policy does not comment on it, nor is information about this available publicly. Either it describes the overall communication style of the enterprise, or it alludes to some other language policy besides the document analysed in this study. While this may be implicit information within UPM, determining a clear tone of voice for the corporation could alleviate this possible uncertainty and create explicit and accessible policies for the employees.

- (14) Pääkieli ja 7 virallista lisäkieltä on määritelty sekä ylätasolla kuvattu kaikessa viestinnässä tavoiteltava **tone of voice**. [The primary language and 7 official additional languages have been defined and at the high level the desired **tone of voice** in all communication has been described.] (emphasis added)

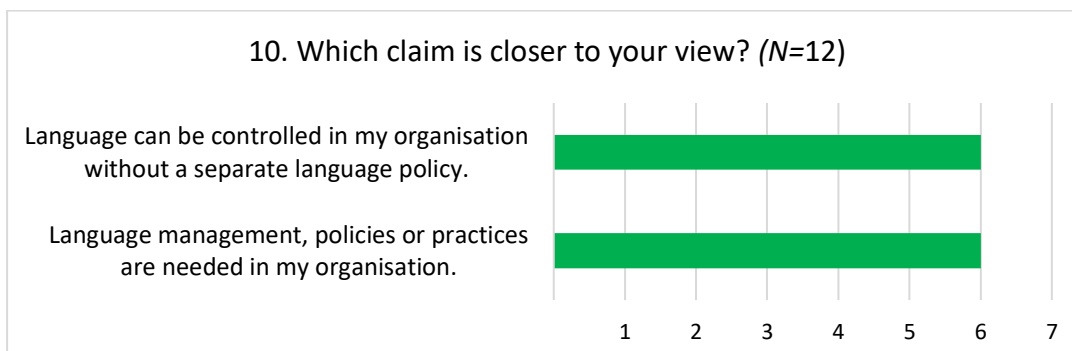


Figure 6 Question 10: "Which claim is closer to your view?"

As seen in Figure 6, the respondents were asked to choose one claim from two options based on which they agreed more with in Question 10. Six respondents chose the first claim,

“language management, policies or practices are needed in my organisation”, and the other six participants chose the second claim, “language can be controlled in my organisation without a separate language policy”. These two direct claims were presented to the respondents to elicit an overall stance on language policy. This type of question is straightforward, and the respondents were not asked to expound on their choice. The limitations of this type of question are discussed further in Chapter 5. However, the division of views on this question is still an interesting finding since even after the purpose and possible advantages of language policy were pointed out in the survey, half of the respondents chose that a separate language policy is not explicitly needed.

4.4 Interpretive policy analysis of the UPM language policy

Having discussed the main policy document and the survey answers related to it, the final section of this chapter consists of the interpretive policy analysis. The knowledge obtained from the previous three subchapters is crucial for conducting an in-depth analysis based on Yanow’s framework. This subchapter is divided into three subsections, but it is important to note that the steps of the analysis often happen simultaneously (Yanow 2000, 20) and they are closely connected. The division in this subchapter is done to create clarity in the analysis and structure of the study. Thus, the steps of the IPA should not be considered entirely separate concepts. Furthermore, as the purpose of this study is to create understanding, the subjectivity and the reflexive position of the researcher-analyst should be acknowledged.

Although the interpretive policy analysis of Yanow (2000) consists of five steps, the first three steps are the most relevant in this study. The fourth step, identifying the points of conflict, is briefly touched upon in 4.4.3, as it is connected to the discourses within and among the communities of UPM. The term discourse used in this context has been defined in Chapter 2.5 as “language in use” (van Hulst et al. 2024, 4). The fifth dimension, intervention, is discussed in the Discussion chapter, but direct measures of intervention are not relevant to this study. Interventive measures can be suggested, but they will not be implemented directly as a result of this study. Concrete intervention can only be carried out by and within the enterprise itself.

4.4.1 Artifacts

Artifacts embody the more abstract meanings of the values of the people and organisations. Artifacts are differentiated and analysed in IPA to understand the LP in a larger context. In

this study, three artifacts are recognised and analysed as representatives of the meanings that the communities possess, and these are the UPM language policy, website, and the Code of Conduct. The website of the enterprise contains information about various matters related to the company and its business, projects, and functions. While the LP of the enterprise analysed in Subsections 4.1 and 4.2 directs the language use, the CoC is a general guideline for all interactions of the company and a direct manifestation of how the enterprise wants to present itself in society and the economy. The language policy has been analysed thus far in Sections 4.1 and 4.2, and this subsection examines the website and Code of Conduct in more depth.

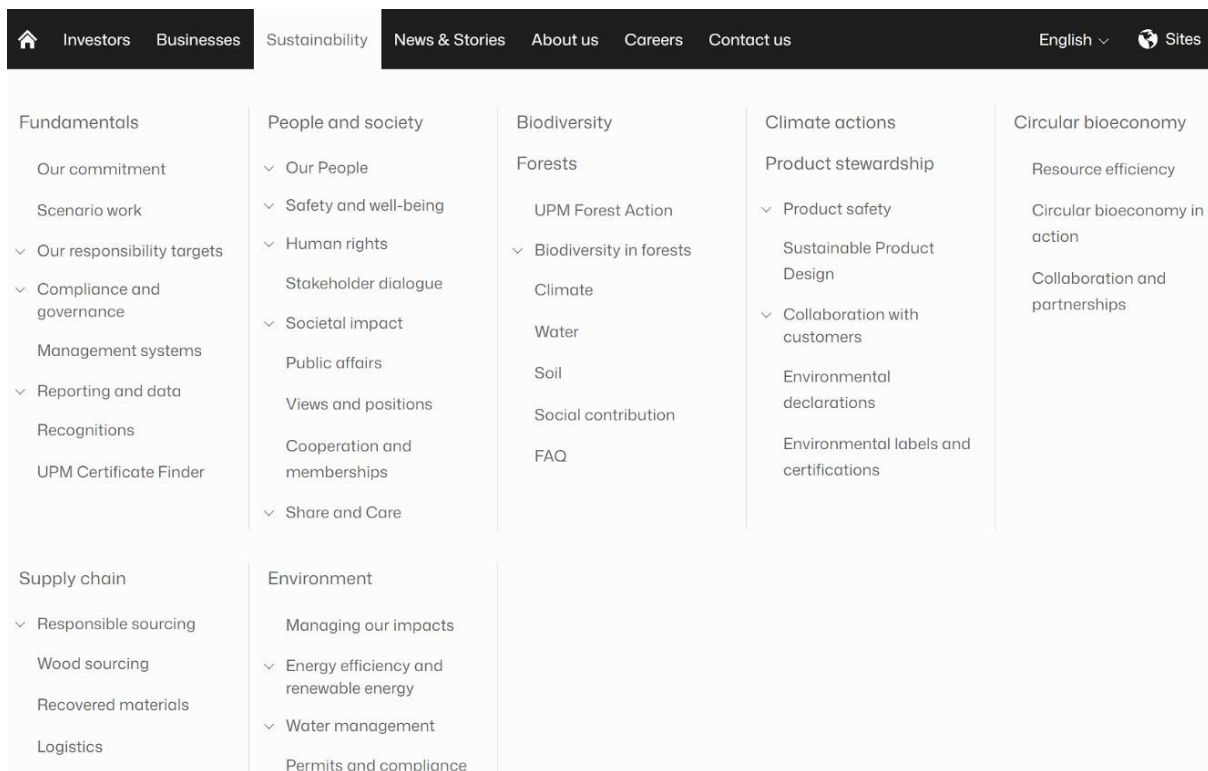


Figure 7 Screen capture from UPM.com showing the "Sustainability" interface.

Moving from the more general level to the specific, the UPM website is studied. The website is provided in five language versions: English, Finnish, German, Japanese, and Chinese.

While the website includes multimodal elements, such as pictures and graphic design, the texts contain the most information and appear to be of more importance. The influence and importance of language cannot be disregarded. The enterprise uses its website as an effective tool for branding and bringing forth its values. Figure 7 shows that especially the "Sustainability" section of the website contains an extensive amount of information. The menu contains 50 headings that lead to articles or subheadings. The Finnish and English menus are mostly identical, but the Chinese and German site versions include considerably less information on the social responsibility of the enterprise. The Japanese version of the site

does not include the “Sustainability” section at all, though it otherwise follows the same format as the other language versions.

Based on its overall online presence and website mentioned in Section 3.1.1, UPM constructs an environmentally conscious and innovation-oriented picture of itself. This branding and the values listed should ideally be reflected in the language policy. While the corporate culture and social values show in the recognition of multiple languages and providing translations, the peoples or cultures are not mentioned in the language policy document. The CoC, however, mentions the word *culture* 5 times. The culture of *inclusion* and *integrity* are both emphasised. The words *language policy* or *language guidelines* do not appear in the Code of Conduct document.

UPM constructs a corporate culture emphasising community and unity with statements and branding such as “culture of Aiming Higher”. The values, practices and beliefs of UPM materialise concretely in the Code of Conduct. The CoC is also mentioned in the language policy as a key message that must be provided in all UPM languages. UPM also evidently places importance on the CoC, as it is mentioned multiple times on the website. UPM (2024) has condensed its culture and values as follows, all the while carrying along the CoC, as seen in Example 15. The Code of Conduct is available in 17 languages and is described as UPM’s “common standard” (UPM 2024, 8).

- (15) Our values – trust and be trusted, achieve together, and renew with courage – and our Code of Conduct guide us on the way. (UPM website 2024)

The CoC also discusses fair treatment and enabling “an inclusive atmosphere where all voices can be heard” (UPM 2024, 18), and the linguistic aspect of these statements cannot be disregarded. The CEO of the enterprise, Massimo Reynaudo, signs off the introductory note at the beginning of the CoC with similar word choices, as seen in Example 16. However, fairness and inclusivity are not mentioned and thus not materialised in the language policy. Then, the language policy itself is closely connected to the external communication on the UPM website and the CoC. Ideally, the LP should reflect the Code of Conduct, as they both manage human-to-human interaction and communication. Possible discrepancies here could indicate that either the CoC is not closely followed or that the CoC is not abiding by the language policy.

- (16) We are committed to creating an atmosphere where all voices can be heard. Speak up, listen to others, and act! (Reynaudo in UPM 2024, 4)

- (17) Our actions and **communication** with colleagues, business partners, and other stakeholders are professional and respectful. (UPM 2024, 16; emphasis added)

The word *policy* is mentioned 31 times in the CoC, and the text discusses *dialogue* (UPM 2024, 62). Dialogue is used to refer to discussions between UPM, stakeholders, and society. Policy in the CoC refers to general policies and conducts, not to language. The CoC mentions language once regarding intolerance towards discrimination through language. The word *communication* is mentioned 4 times, concerning communicating UPM's policies and requirements within and outside the organisation. Example 16 showcases the use of "voices" and "speaking". Communication is also recognised in its social and interpersonal understanding, as seen in Example 17. The statement does not describe language use directly but does set the expectation of professionalism and respect in the communication style and tone of the corporation. This policy is related to language use and practice. Next, the communities affected by the LP and the Code of Conduct are analysed.

4.4.2 Communities

As UPM is a multinational enterprise, the interpretive communities are multinational and spread out geographically. As noted in the close reading of the LP, the responsibility is placed on the individual, or the corresponding unit, and the UPM language policy becomes somewhat separated from the language practices. The LP does not offer concrete instructions or clear strategies for possible issues in language use. Language policy is also crucial in preventative work and unifying language use. Contradictory, vague, or ambiguous messaging and communication puts an organisation in a disadvantageous position. Language use is also one of the most valuable tools in crises and crisis communication.

A language policy that relinquishes the responsibility of creating language practices for individuals may result in tenuous practices. The purpose of the policy is to explicate these practices and unify the language used by an enterprise while the individual is responsible for interpreting these policies. The UPM language policy does not offer substantial information to an employee looking for clarification, certainty, or context-related "universal" guidelines. How is any confusion or questions from the employee then likely answered? There are multiple possibilities, such as the existence of a spoken LP or ad hoc policies, individuals navigating these situations of uncertainty on their own, or simply solving issues only as they happen or in retrospect. Different businesses or functions may also have language policies

that are not known outside the units. Next, the different interpretive communities named in the LP are examined in more detail.

The division between internal and external communication is common in corporate language use. UPM has also distinguished between these communities in its language policy. The following list includes the internal communities explicitly named in the running text of the language policy: UPMers (i.e., all UPM employees), production employees, managers, office employees, global project leaders, content owners, and dedicated communicators. Especially the last two communities on the list are of interest in this analysis, as they are not defined further in the language policy. The “content owners” can be perceived as a relatively vague term, as the ownership of content can be multifaceted. The concept of the “dedicated communicator” is equally uncertain as the process of dedication or naming of this communicator is not established in the document. While these communities may be internally defined within the corporation, the language policy itself does not offer outlines for this.

The rest of the internal communities could be categorised based on the position of the employees in the firm, that is, employees in production and employees in management. The managerial and production level employees often follow different regulations. It should be noted that the survey portion of this study has been conducted at the higher levels of the corporation and that it offers insight into only one aspect of the organisation. Still, Sanden and Kankaanranta (2018, 557) argue that “all employees can be seen as language planners whenever they make a language choice”. A holistic understanding of the language structures within the organisation would bring agency to those who were not named in the policy and those who still use their language repertoire as a tool in their work.

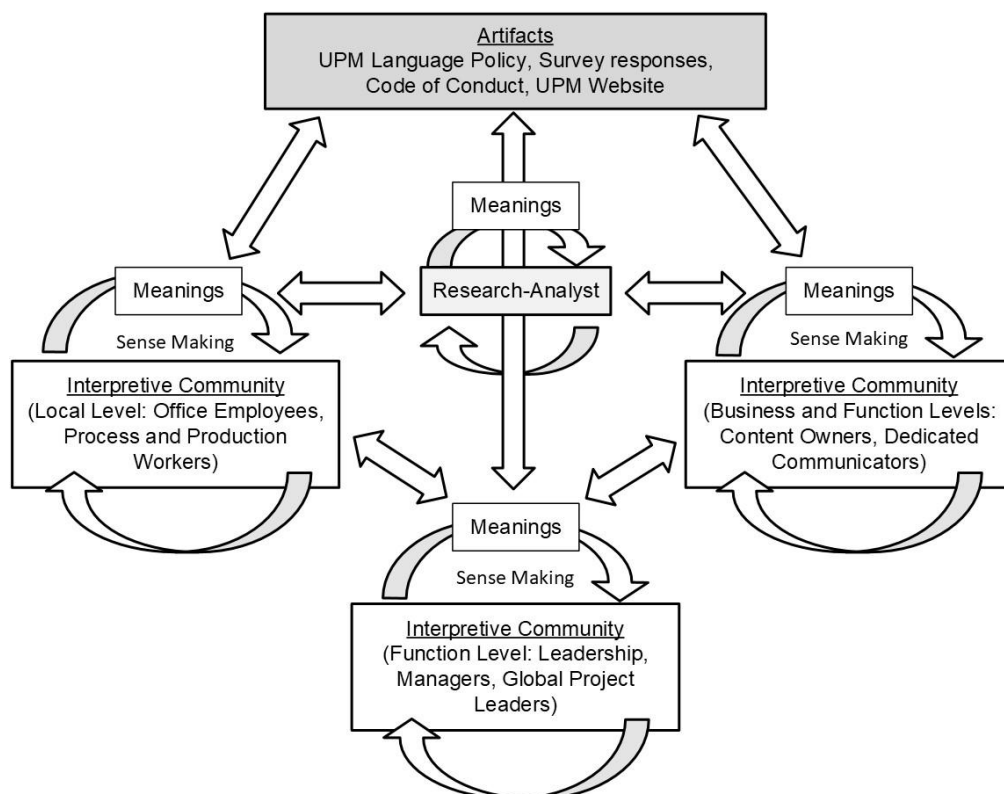


Figure 8 Version of the “Interpretive Policy Analysis Web” from Tribble (2014, 92), supplemented with the internal communities of UPM.

The internal communities recognised in the language policy have been placed in the “interpretive policy analysis web” of Tribble (2014, 92), as seen in Figure 8. The artifacts have been listed according to the documents available for this analysis. The interpretive communities are divided into local, business and function, and function levels. The diagram demonstrates how the interpretive communities are connected and “make sense” of the artifact documents. This diagram visualises one possible web of sense- and meaning-making within the enterprise. A similar web of policy analysis could be made, for example, on the external interpretive communities related to the UPM language policy, and it could even be merged with this one. Multiple of these webs of understanding could be considered to exist and overlap simultaneously.

According to the interview with the UPM representative, international mobility of the enterprise’s workforce is considerable. UPM has production sites globally, the employees can relocate physically, and due to recent events, hybrid or online teams have formed as well. The factories require installation and engineering work to be established and to run smoothly, and this is accomplished through sharing existing knowledge between countries and employees. UPM offers its employees language training in the target country, which eases knowledge transfer and integration in the target country. This kind of facilitated language-related support

is beneficial to both the corporation and the employee. It requires understanding and appreciation of language and culture from both.

Spoken interaction between different languages and multilingual people is inevitable; however, the language policy only refers to a written mode of language. Process workers themselves employed in factories are not mentioned, but the “info screens” in these establishments are regulated by the policy, as seen in Example 18. Whether the policymakers themselves have been involved in interacting with or managing these screens is unknown. Additionally, it is unknown whether the process workers have been consulted in creating the LP or if the production plants have their own language policy.

- (18) Communicators in regions are **responsible** for managing the majority of content in local language. Communications and Brand has the authority to coordinate and publish employee relevant corporate content on all info screens. (UPM Language Guidelines; emphasis added)

As seen in Subchapter 4.2, the language policy was deduced to have been created top-down. This type of communication in general is examined next. The language policy of UPM does not touch upon communication from management to employees and vice versa. A large multinational enterprise commonly has clear divisions in responsibility and organisational levels. The general language policy need not go into detail about individual tasks in communication, for example, concerning a specific factory. Still, manager-employee communication happens on every level of an organisation, as well as communication with interest groups or customers. Language policy can aim to manage not only written language but spoken as well. Here, the use of the words “respect” and “responsibility” in the CoC could indirectly cover this aspect of language use in the context of both internal and external communication.

Next, the external communities affected by the policy are inspected. Communication with stakeholders, interest groups, and business partners is of substantial importance for any corporation. The UPM LP does address external communication in terms of the appropriate languages used for stock exchange communication and sharing news, but the emphasis is again on choosing which languages to use and not the language use itself. The responsibility of making these choices is placed on the individual communicator or the business (Examples 18 and 19). The LP explicitly distinguishes two communities in external communication: the stock market and investors. The instruction for communicating with these speech communities is about which languages to use, those being namely Finnish and English.

- (19) Each business is responsible for producing and publishing its own news releases. (UPM Language Guidelines)

Then, language use with and towards customers and the public is equally important. The language policy does not specify this very closely which leads one to believe that customer service, for example, would have its own language policy, or at least it should have. As noted in Section 2.4 of this study, it is not uncommon that language policy is embedded within other policies, guidelines, or instructions. The language policy directs specifically language use, which is why it would be beneficial, however, to mention public relations or customer interaction. One option, for example, could be to include instructions on where to find information on crisis communications or how to employ the preferred tone in communication.

4.4.3 Discourses and points of conflict

After understanding the tangible artifacts related to the policy, and the communities that create them or are impacted by them, the researcher-analyst can gain access to the meanings, values, and beliefs communicated through the artifacts (Yanow 2000, 17). The communities place meanings on the symbolic actions of the members in the community and the end-products of said actions, and these meanings are mostly symbolic and tied to their specific context (ibid.). The term action here refers to “language in use” (van Hulst et al. 2024, 4), or broadly, discourse. These actions can also represent parts of wider societal discourses, which can be affected by an ideology. Accessing the discourse of the specific community of people who responded to the survey concerning the language policy is the main method of accessing these actions and meanings in this study. However, the willingness of UPM to participate in this study in general could be considered a symbolic act that showcased an interest in language management and policy. As observed through the material collection of this study, the other 35 corporations did not display similar interest in participation.

In the survey, many respondents brought up the meanings and values they place on the language use and policy in the enterprise. One respondent mentions how the “corporate culture” affects the language choices of the employees (Example 20). This implicit policy is not mentioned in the UPM LP document or the CoC. Another topic raised by the respondents is the importance of translation and the possibilities of AI or machine translation, as seen in Example 21 from a response to question 5. The language policy of the enterprise does not address the use of artificial intelligence.

- (20) It's part of the corporate culture to speak English as soon as there is one person not understanding Finnish or whatever other language.
- (21) Nyt kun konekääntämisen mahdollisuudet laajenevat niin toivon, että konsernissa saadaan enemmän materiaalia, joka on jokaisen työntekijän saavutettavissa, kohderyhmänä eri maissa toimivat tehdastyöntekijät. Tämän saavuttaminen on ollut joskus työlästä. [Now that the possibilities of machine translation are expanding, I hope that the company will get more material that is accessible to every employee, with the target group being factory workers operating in different countries. Achieving this has sometimes been laborious.]

The survey responses reported challenges in communication with factory or process employees. It is described as difficult or inefficient since there are often multiple languages and cultures at play. As the community accessed directly in this study was somewhat heterogeneous, the communication branch of the enterprise, it was not possible to access the discourse of the other communities within UPM, such as the process workers mentioned by the respondents. The fourth step of IPA is based on finding possible points of conflict within or between the communities. Points of conflict in the context of this study could be considered more so points of *contradiction* or social tension (Yanow 2000, 77). Studying the corporate environment of UPM has not revealed considerable disagreements in language use. Still, the aforementioned challenges in language use could be considered possible points of conflict if left unattended. The following subchapter explores the relationship between LP, employee perspectives, and language ideology.

4.5 Language ideology

The observations made through the IPA may allude to some language ideologies. The arising themes coincide with BELF, multilingualism, and the idea of corporate social responsibility. Language policy and ideologies are also related to power use, but the power dynamics within the organisation could not be analysed based on the data of this study. Instead, the observations in the previous subchapters are connected here to the ideologies introduced in 2.2. Inspecting the ideological background of the policy allows for a deeper understanding of the mechanics of the LP, which in turn ideally provides space for developing the policy further.

Interestingly, the significance of Finnish language use stood out in the survey responses. According to the interview with the UPM representative, an employee transferring to Finland without prior language skills commonly finds the Finnish language as an obstacle in

integration and workplace interaction. The survey responses support this view, and it especially manifests in Example 12: “The challenge is improving the immigrant's Finnish language skills when it is necessary to speak English with them to advance matters.” The global mobility of the employees of the corporation is vast, and so linguistic diversity and accommodation should be acknowledged. However, the overall opinion on the languages used in communication seems positive despite occasional challenges.

Then, although the LP of UPM is supportive of multilingualism, BELF still coexists with the use of Finnish. It should be noted that “English as the main medium of communication has become self-perpetuating and unquestioned” (Sanden and Kankaanranta 2018, 557), and this is rooted in both ideology and practicality. They are interconnected as dominant ideologies have created shortcuts and are cemented in existing procedures. The ideological significance of English as a lingua franca cannot be disregarded, as the Finnish-owned, globally functioning enterprise uses English as its primary language. This is despite English being only a few employees’ native language, per the discussion with the UPM representative. Thus, the use of English is related to the “normalization of Anglo-American cultural dominance in multinationals” (Vaara et al. 2005, 621).

Then, at the macro-level, state language policy can influence the language policies of an organisation or business (Lesk, Lavrig, and Stegu 2017, 289). English language use in Finland has increased significantly, especially in business, and the use is speculated to still increase (Leppänen et al. 2011, 167). One of the most noticeable qualities in the state language policy in Finland is the status of Swedish. As the second official language of Finland, it is required in public communication. In the UPM language policy, Swedish is named as one of the languages used in communication with production employees, although UPM has no production plants in Sweden. This could allude to Finland’s bilingual language policy. Out of the 12 survey respondents, one person spoke Swedish as their native language. Despite geographical constrictions and nation-state divisions, UPM as a business enterprise is still not strictly constricted by any single country's regulations.

Thus, it could be concluded that UPM supports multilingualism while also opting for monolingualism, namely ELF. This combination could be seen as a common strategy in MNCs (Feely and Harzing 2003, 43), as the corporations aim to utilise the language repertoires of their employees while having a standardised mode of communication. Employees proficient in a language that a business needs to function in can become “informal

language nodes” (Feely and Harzing 2003, 46). This combination allows for fluidity in language practices as well as the realisation of language policy. Acting aligned with multiple ideologies simultaneously is not uncommon, as long as the ideological background is understood and, when needed, critically evaluated.

5 Discussion

In this section, the findings presented in the previous chapter are connected to the larger context, and certain conclusions are drawn. This study aims to answer three research questions, and each of them is revisited in this chapter. The first two questions have been investigated through the survey and the IPA, and the main results and implications are discussed here in more detail. The third research question is answered in this chapter based on the findings of the first and second research questions. The results of the study are interpreted and reflected upon to create leverage for UPM to possibly develop their LP further.

To discuss the first research question, “How does the individual employee perceive the UPM language policy?” the main themes arising from the survey responses are summarised. Overall, the general attitude towards the LP of the organisation was positive. Some respondents wished for more translations and more multilingualism in the communication of the enterprise, both locally in the process plants and globally. Example 13 in Section 4.3 vocalises their concern directly: “People need information primarily in their mother tongue, especially in the factory and production work where English may not be as widely spoken.” The respondents provided views for and against detailed LP, but more multilingual policies seem to be desired. It should be noted that this study also focused on the higher-level positions of the branch, not process workers.

Now, some survey-related issues should be recognised. Firstly, it should be noted that the sample size of this study has been relatively small. Although the twelve respondents provided important insights and opinions, the number of participants is still too small to represent the corporation or even its communication branch. Second, the topic of the survey being language policy, something that is not widely discussed or perhaps actively considered in day-to-day work, the formation of the questionnaire itself proved challenging. A definition for the term itself had to be provided at the beginning of the survey, and it should be recognised that this definition can have affected the responses. This has been considered when studying the responses.

Third, the survey-based methodology presents its inherent challenges. One common bias in survey-based research is the self-report bias, that is, having to rely on the “self-perceptions” of the participants instead of accessing the language practices directly (Lesk, Lavric, and Stegu 2017, 272). Another bias, especially when trying to access language attitudes, is the

acquiescence bias (Garrett 2010, 45). This bias shows that respondents are slightly more likely to agree with the item than to disagree or display their full opinion (ibid.). For example, Question 3, asking directly about the participants' satisfaction with the LP, could have been affected by this bias. As such, the formulation of each question can have affected the responses. The formulation of Question 10 was not optimal, as it forced the participants to choose a claim provided with minimal information:

10. Which claim is closer to your view?
- Language management, policies or practices are needed in my organisation.
 - Language can be controlled in my organisation without a separate language policy.

Regardless, surveys are convenient and speedy in data collection: "A huge amount of information can be collected quite quickly and economically" (Palviainen and Huhta 2015, 196). Transparency and reflexivity in survey research are crucial. Reflexivity is the "active consideration of and engagement with the ways in which [their] own sense-making and the particular circumstances that might have affected it" (Schwartz-Shea and Yanow 2011, 100). The importance of this approach is also highlighted in interpretive policy research. Researcher reflexivity is also recognised as a criterion in the paradigmatic reading of IB research (Piekkari, Gaibrois, Johansson 2022, 151). The interpretive approach introduced in Chapter 2.1 agrees with the aims and methods of this study, especially regarding the researcher's positionality.

More concrete results could be obtained by interviews or integrating the researcher into the company further. Not knowing when or how the survey was being circulated within the corporation was quite limiting. Of course, further involvement from the researcher could bring along other issues, like impeding objectivity or the possibility of affecting the views of the respondents. This does, however, pose possibilities for future research in studying the language policies and practices of MNEs. UPM's general interest in research is apparent, as they have participated in multiple studies and conduct research of their own as well. Openness to research is valuable and should be encouraged more societally and in multinational corporations.

Consequently, one caveat in the study design was the reliance on finding corporations willing to participate in the survey and submit their language policy for analysis. As the number of companies that responded to the initial contact was small, it begs the question: is the

importance of language policy understood, and how many enterprises have it explicitly written out in the first place? While other factors may also cause reluctance to participate, future studies could map out the amount and quality of language policies in (Finnish) multinational corporations.

The second research question was answered through a close reading of the policy, followed by the interpretive policy analysis. In the first step of the IPA, the different artifacts related to language use in the corporation were studied and it brought to light central aspects of the language policy. The UPM language policy appears to manage the choice of which language to use, not *how* to use it. However, although language use in organisations is central to how well it functions, balancing the regulation and personal agency of the employees remains a challenge. How do we account for everyone's language needs? One aspect to consider would be the involvement of everyone versus a select few in creating policies. Inclusion and dividing responsibility equally could aid in creating a functional policy. As observed by classifying the LP based on Johnson (2010) in 4.2, the policy can be seen as having developed top-down. The alternative for this could be bottom-up policy creation, where all the relevant actors within the community would be consulted.

As observed by Peltokorpi and Vaara (2012, 823), "local adaptation needs" can affect the implementation of a corporate-wide language policy, and having as many subsidiaries as UPM does, it is most likely the case that the LP is not always realised. A more extensive IPA could be conducted if more policy-relevant actors or communities could be interviewed or surveyed, for example, by including other branches, subsidiaries or internal groups in the survey. Currently, it appears that the power in language regulation in the corporation is placed on the "headquarters" of UPM. However, the policy states that "each business is responsible for [...] its own news releases", which delegates power back to the businesses and subsidiaries. Logemann and Piekkari (2015, 34) have addressed this phenomenon in their research as "the subsidiary may use its bargaining power to render the processes more sensitive to local conditions". Thus, it could be concluded that the UPM language policy enables localisation for its businesses.

To answer the third research question, the previous findings and interpretations made in this study must be synthesised. Returning to the fivefold theory on language policy components by Spolsky, the UPM LP appears to focus on the first component, language practices. The second component, language beliefs, could be inspected and developed further by the

corporation. Language beliefs refer to the “assigned values to named and unnamed varieties and to identifiable variations in language choice” (Spolsky 2018, 326). This could be connected to the tone of voice of the corporation as it is a type of language variation in corporate communication.

Currently, the tone of voice of the enterprise is not articulated in the language policy at all, although it is passingly mentioned in the CoC in the form of aiming for “professional and respectful” communication (Example 17). The importance of the tone of voice of organisations has increased in recent years (Oh and Ki 2019, 326), so one suggestion for UPM would be to incorporate some overall statements of strategy in the LP itself. The enterprise could unify its communication by articulating a clear tone of voice for communication and explicating concrete ways of perpetuating it. Clarifying the style of communication could unify the brand of the enterprise as well. An organisation can adopt multiple styles of communication too, but on the whole, communication should be coherent.

Then, an important question could be posed as such: should the enterprise have a more detailed language policy? This question lies at the heart of this study, but it does not receive a singular correct answer. In their study, Sanden and Kankaanranta (2018, 557) found that vague or unofficial language policies lead to “uncertainty, confusion, frustration, and inter-collegial conflict”. Although this analysis could not access those possible issues, the employees nonetheless identified areas that could use improvement. To avoid frustration, one could opt for creating a detailed LP that covers most points of confusion. Language policy should be based on the wider strategies of a corporation, and it should be goal-oriented, at least to some extent, as it does not exist in a vacuum. Implicit knowledge is not accessible to all, and it lacks transparency, especially to new members of a community.

On the contrary, language policy and planning must maintain a balance between regulation and individual freedom. Policies that are too strict and rigid can rouse resistance, or the language practices may simply not follow the policy. In this case, Saulière’s (2014, 222) argument of “functional bilingualism” instead of following strictly a single official language rings true. Sanden (2020, 23) follows a similar line of thinking and establishes ten areas of intrinsic challenges in language policy. Drafting a language policy requires a thorough analysis of the language (management) needs and existing practices in the organisation, yet it still may not fulfil all expectations or requirements of a “successful” LP. The challenges can result in, for example, ineffective planning, time-consuming and expensive measures, and

employee dissatisfaction (Sanden 2020, 25). Thus, language policy should not be regarded as an all-encompassing and problem-solving artifact, and it should be viewed through a critical lens.

Additionally, recognising the possible ideological background of language policy creation is necessary. As Spolsky (2003, 14) theorised, language policy and ideology are intrinsically connected. As per the analysis in this study, UPM has created its policy following the ideology of BELF but supports a considerable number of other languages. Multilingualism in UPM is apparent, and the corporation does account for multiple languages. However, according to the survey, this aspect of language use could still be developed further. Although the UPM corporate culture entails speaking English when there are non-Finnish speakers present, integration into the Finnish-speaking workplace is still considered a challenge. This is seen as limiting the possibilities of multilingualism in the organisation according to a respondent (Example 11).

Artificial intelligence, machine translation and the significance of machine learning cannot be overlooked in the modern corporate environment. The policy was received from the corporation in 2024, and it was likely created sometime before 2024 when AI use was still less common. Technological development has been rapid, and the speed of digitalisation is yet increasing (Jaumotte et al. 2023). Due to this global trend, even policies drafted at this time in 2025 will likely be redundant in a relatively short period. Still, guidance on AI use in language and communication is in place, which is one conclusion based on the data provided by the survey and the current corporate environment, which is becoming more and more tied to artificial intelligence tools (Eurostat 2025). Thus, one component for developing the policy would be creating guidelines and establishing a strategy for language-related AI use.

This study has partly addressed the agenda for future research by Tenzer, Terjesen, and Harzing (2017, 821) in expanding on the individual-level perspectives of a multinational enterprise. This study has provided unique views into the language policy of UPM, addressing possible needs for future improvements of the LP. While the results are not generalisable to larger contexts and present only the opinions of these few people and this specific corporation's language policy, the results follow previous LP research. Furthermore, similar challenges in policy creation and implementation have been noted in previous research (Peltokorpi and Vaara 2012, 829).

6 Conclusion

The purpose of this study has been to form a thorough understanding of UPM's language policy. The functionality and articulation of the policy have been examined in particular. This has been done through three qualitative methods: conducting a survey, close reading, and interpretive policy analysis. In the Introduction chapter of this study, three research questions were presented. They are now revisited, and the results are summarised.

The questionnaire was used to address the first research question, “How does the individual employee perceive the UPM language policy?” as the employees provided their views and opinions on the current circumstances regarding the language policy. The 12 employees who responded to the survey viewed the language policy generally positively but still offered valuable insights into what may be missing or may require more attention in the future. Important themes outlined from the survey responses were improving multilingualism, translation, inclusion, and clarity in language policy.

The second research question, “How does UPM articulate its language policy?” was explored through close reading and Dvora Yanow’s interpretive policy analysis framework. In the first step, artifacts were inspected utilising close reading and classification of the LP. Overall, UPM expresses its language policy at a general level without going into much detail about any specific aspect of communication. It offers guidance on which languages to use in what communication but entrusts the responsibility of communication choices to the “individual communicators”. While some vagueness may be useful in outlining the general practices of the enterprise, the language policy offers little concrete instructions.

In the second step of IPA, the communities affected by or related to the language policy were investigated. According to the analysis and supported by the survey answers, a language policy can have multiple meanings to different communities and even within a community. The third step of IPA inspected the discourses on multilingualism, artificial intelligence, corporate culture, and translation in the enterprise. The fourth step of the analysis did not reveal overt points of conflict. As found in the analysis, UPM has developed its policy based on the BELF ideology but still supports a wide range of other languages. Multilingualism is evident in the enterprise, and it accommodates multiple languages. However, the survey indicates that there is still room for improvement in this area.

Exploring the third research question, “What could the company consider in developing this policy further?” provided some propositions for developing the LP. The propositions concern the following topics: style of communication, unifying the communication of the enterprise in general, the use of artificial intelligence, translation needs, and accounting for the plethora of language needs in different contexts. The corporation could establish a clear tone of voice for communication, both internally and externally. The style and tone of communication could be more unified between and within the subsidiaries. Then, the increasing demands for machine and AI translation could be accounted for in the policy. Finally, the need for more translation in general was a rising theme, and as such, the policy could include more multilingualism and inclusion through translation. Flexibility in the language policy creation process could create room for hearing from all parties involved.

While this study has provided insight into this specific corporation, the results resemble previous research. For future studies, a longitudinal approach could be taken, for example, to observe how changes in language policy affect employee satisfaction or even the economic performance of the corporation. This topic would continue the line of research by Sanden and Kankaanranta (2018), where different types of policies can affect employees’ experiences. Another implication for further research provided by this study is that, in the context of UPM, the survey could be distributed to a larger group of employees and across internal functions. Additionally, conducting interviews would provide more in-depth information on the current situation.

The results of this study could be used as a preliminary mapping of the current circumstances in the corporation. As noted before, the study does not aim to offer concrete solutions. This thesis has created a reflective opportunity for the organisation to examine their language use, and the study offers tools for understanding language management in UPM. By pursuing the three guiding research questions, the language policy and employee perspectives have been investigated. As a result, the enterprise can be provided with research-backed prospects for developing its language policy. As these concerns in language policy and planning may not be unique to UPM, other multinational corporations could benefit from a similar manner of analysis.

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Appendices

Appendix 1 Guiding themes of the interview with the UPM representative

- Practical matters concerning the survey:
How widely will the survey be distributed? When should the survey close and when should the reminder messages be sent? Who will be the main target of the survey (managerial, employee, etc.)?
- Background information on the workforce of the enterprise:
What kind of global mobility do the employees of the enterprise have? How do offices in different countries communicate with one another?
- Background information on the language policy:
Where and to whom is the language policy accessible? What kind of language policies do other countries or offices employ? How was the language policy created (top-down – bottom-up)?

Appendix 2 Privacy notice and survey in English

PRIVACY NOTICE

26.4.2024

1. Name of the registry:

Employees' views on the organisation's language policies and practices

2. Data controller:

Liina Salo, [phone number], [e-mail address]

University of Turku, School of Language and Translation Studies, Turku

3. Contact person regarding the research registry:

Liina Salo, [phone number], [e-mail address]

4. Purposes of processing data and lawful basis for processing personal data:

The study aims to understand employees' views and opinions about the language policies of their organisation. The survey through which the information is collected enquires for example about the existence and relevance of the language policies and how language policies and multilingualism are realised in day-to-day work.

According to the 6th article of the EU General Data Protection Regulation: the processing is necessary for the performance of a task carried out in the public interest for research (Article 6, 1. point e).

5. Content of research records:

The registry will include the following information:

Age, gender, years worked in the organisation, native language, experiences and views on language policies in the organisation.

6. Recipients of data:

Information will not be transferred or disclosed outside the research group.

7. Transfer or disclosure of data to external parties:

Information will not be transferred or disclosed outside the EU or EEA.

8. Processing of personal data after the research project has been concluded:

The results of the survey will be analysed and categorised according to the research questions of the study. All personal information is anonymised. Personal information is stored for five years after the approval of the thesis.

9. Rights of the participant:

Participants have the right to request access to any personal information in the data, to correct them, delete, limit or resist the processing. The right to delete personal information will not be

applied to scientific or historical research purposes when the deletion would prevent processing or complicate it greatly.

The right to access data is assessed individually.

The participant has the right to appeal to a supervisory authority.

10. Sources of data:

The organisation is asked to distribute the survey. All other information is collected directly from the participants of the survey.

11. Automated decision-making:

The information will not be used in automated decision-making or profiling.

Data protection officer of the University of Turku: dpo[at]utu.fi

Survey

Certain words were written in bold in the survey and the same typography is followed here. Mandatory questions are marked with an asterisk (). Some questions were open-ended and are indicated here with (open).*

1. How often do you find yourself in work-related multilingual situations where you would not manage with only your native language? *

- Never
- Rarely
- Sometimes
- Often
- Always

2. **Based on the definition above and your own knowledge**, what kind of language policies does your organisation have, if any? *

- The organisation does not have an explicit, written language policy.
- The organisation has some regulation regarding multilingualism, but no comprehensive language policy or practices.
- The organisation has an explicit, written language policy.

3. How satisfied or dissatisfied are you with your organisation's current language policy?

Please consider especially policy regarding **multilingualism**. *

- Very dissatisfied
- Dissatisfied

- Neither
- Satisfied
- Very satisfied

4. If you are dissatisfied, how would you describe your view? If you don't want to comment, please leave this blank. (open)

5. How would you improve the language policies in your organisation? If you would not improve anything, please leave this blank. (open)

6. Was language competence or skills a requirement or desired when you applied for this job?

*

- No
- Don't know
- Yes

7. What kind of language requirement(s) were there? (open)

8. In your opinion, how is language management realised in your work? Are the policies **relevant** to your work? Please mention any examples that come to mind briefly. (open)

9. Is there a specific **corporate language** in your organisation? This can be, for example, a designated language for internal or external communication. *

- No
- I don't know
- Yes, which language?

10. Which claim is closer to your view?

- Language management, policies or practices are needed in my organisation.
- Language can be controlled in my organisation without a separate language policy.

11. If you want to add anything to previous questions or want to share thoughts about this topic, you can write it here freely. Feedback on the survey is also welcome. (open)

12. How long have you worked in this organisation? *

- Less than 6 months
- Over 6 months, under 2 years
- Over 2 years, less than 5 years
- Over 5 years

13. What is your age? *

- 18–24
- 25–34
- 35–44

- 45–54
- 55–64
- Over 65

14. What gender do you identify with?

- Female
- Male
- Non-binary
- Other/prefer not to answer

15. Your native language? *

- Finnish
- Swedish
- Other

16. Please specify your native language. If you are bilingual, you can mention multiple.

(open)

Appendix 3 Privacy notice and survey in Finnish

TIETOSUOJAILMOITUS

26.4.2024

1. Rekisterin nimi:

Työntekijöiden näkemyksiä organisaation kielikäytänteistä

2. Rekisterinpitäjä:

Liina Salo, [phone number], [e-mail address]

Turun yliopisto, Kieli- ja käännöstieteiden laitos, Turku

3. Vastuuhenkilön yhteystiedot:

Liina Salo, [phone number], [e-mail address]

4. Aineiston käsittelyn tarkoitukset ja käsittelyn oikeusperuste:

Tutkimuksessa kerätään vastauksia kyselyyn, jossa kysytään työntekijöiden käsityksiä ja mielipiteitä yrityksen kielikäytänteistä. Kyselyssä kerätään tietoa esimerkiksi kielikäytänteiden muodosta, tarpeellisuudesta, arvostuksesta ja siitä, kuinka monikielisyys ja kielikäytänteet näkyvät työssä.

Henkilötietojen EU:n yleisen tietosuoja-asetuksen 6 artiklan mukaisena käsittelyperusteena on: käsittely on tarpeen tieteellistä tutkimusta varten (yleinen etu 6 art. 1 e-kohta).

5. Käsiteltävät henkilötietoryhmät:

Rekisteriin talletetaan rekisteröidystä seuraavia tietoja:

Ikähaarukka, sukupuoli, työskentelyvuodet yrityksessä, kielitaito (äidinkieli), kokemuksia ja käsityksiä kielikäytänteistä yrityksessä.

6. Aineiston vastaanottajat ja vastaanottajaryhmät:

Tietoja ei siirretä eikä luovuteta tutkimusryhmän ulkopuolelle.

7. Tiedot tietojen siirrosta kolmansiin maihin:

Tietoja ei luovuteta EU:n tai Euroopan talousalueen ulkopuolelle.

8. Henkilötietojen säilyttämisaika tai sen määrittämisen kriteerit:

Kyselylomakkeen tuloksia arvioidaan, ryhmitellään ja lajitellaan tutkimuskysymysten mukaisesti, ja samalla tutkimusaineistosta poistetaan suorat tunnistetiedot. Mahdollisia henkilötietoja säilytetään viisi vuotta opinnäytteen hyväksymisestä.

9. Rekisteröidyn oikeudet:

Rekisteröidyllä on oikeus pyytää pääsy häntä itseään koskeviin henkilötietoihin sekä oikeus pyytää tietojensa oikaisemista tai poistamista taikka käsittelyn rajoittamista tai vastustaa niiden käsittelyä. Oikeutta henkilötietojen poistamiseen ei sovelleta tieteellisessä tai

historiallisessa tutkimustarkoituksessa silloin, kun poisto-oikeus todennäköisesti estää käsittelyn tai vaikeuttaa sitä suuresti.

Poisto-oikeuden toteuttamista arvioidaan tapauskohtaisesti.

Rekisteröidyllä on oikeus tehdä valitus valvontaviranomaiselle.

10. Tiedot siitä, mistä henkilötiedot on saatu:

Kyselyn lähettämiseksi pyydetään viestin välitysmahdollisuutta yritykseltä sen sisäisesti.

Muut tiedot kerätään suoraan kyselyyn osallistuvilta.

11. Tiedot automaattisen päätöksenteon ml. profiloinnin olemassaolosta:

Tietoja ei käytetä automaattiseen päätöksentekoon tai profiloinnin tekemiseen.

Turun yliopiston tietosuojavastaava: dpo[at]utu.fi

Survey

Certain words were written in bold in the survey and the same typography is followed here. Mandatory questions have been marked with an asterisk (). Some questions were open-ended and are indicated here with (open).*

1. Kuinka usein löydät itsesi monikielisistä tilanteista työssäsi (=tilanteita, joissa et pärjäisi pelkällä äidinkielelläsi)? *

- En koskaan
- Harvoin
- Joskus
- Usein
- Jatkuvasti

2. Perustuen yllä olevaan **määritelmään ja omiin tietoihisi**, minkälaista kielipolitiikkaa tai käytänteitä organisaatiollasi on? *

- Organisaatiolla ei ole avointa, sanoitettua kielipolitiikkaa tai -käytänteitä.
- Organisaatiolla on joitakin monikielisyyteen liittyviä linjauksia, mutta ei laajempaa kielipolitiikkaa tai käytänteitä.
- Organisaatiolla on avoin ja sanoitettu kielipolitiikka ja/tai -käytänteet.

3. Kuinka tyytyväinen tai tyytymätön olet organisaatiosi tämänhetkiseen kielipolitiikkaan?

Pohdi erityisesti **monikielisyyteen** liittyviä linjauksia. *

- Erittäin tyytymätön
- Tyytymätön

- En tyytyväinen enkä tyytymätön
- Tyytyväinen
- Erittäin tyytyväinen

4. Jos olet tyytymätön organisaatiosi tämänhetkiseen kielipolitiikkaan, miten perustelisit vastauksesi? Jos et halua kommentoida, voi kysymyksen jättää tyhjäksi. (open)

5. Miten kehittäisit organisaatiosi kielipolitiikkaa? Jos koet, ettei muutoksille ole tarvetta, voit ohittaa tämän kysymyksen. (open)

6. Oliko kielitaito vaatimuksena tai toiveena työhön hakiessasi? *

- Ei
- En tiedä
- Kyllä

7. Minkälaisia kielitaitoon liittyviä vaatimuksia tai toiveita kohtasit? (open)

8. Miten kielen hallinta toteutuu työssäsi tai työyhteisössäsi? Ovatko nämä kielikäytännöt mielestäsi relevantteja työssäsi? Voit mainita mieleen tulevia esimerkkejä lyhyesti. (open)

9. Onko organisaation käytössä jokin tietty yrityskieli? Tällä tarkoitetaan kieltä, joka on määritelty sisäisen tai ulkoisen viestinnän kieleksi. *

- Ei
- En tiedä
- Kyllä, mikä kieli?

10. Kumpi väite on lähempänä omaa mielipidettäsi?

- Kielenhallinta, -käytännöt ja -politiikka ovat tarpeellisia organisaatioissani.
- Kieltä voi hallita organisaatiossa ilman erillistä, sanoitettua kielipolitiikkaa.

11. Jos koet, että jotakin jäi kysymättä tai mietityttämään, voit kirjoittaa siitä vapaasti tähän.

Voit myös halutessasi antaa palautetta kyselystä. (open)

12. Kauanko olet työskennellyt tässä organisaatiossa? *

- Alle 6 kuukautta
- Yli 6 kuukautta, alle 2 vuotta
- Yli 2 vuotta, alle 5 vuotta
- Yli 5 vuotta

13. Mikä on ikäsi? *

- 18–24
- 25–34
- 35–44
- 45–54

- 55–64
- Yli 65

14. Mihin sukupuoliin identifioitunut?

- Nainen
- Mies
- Muunsukupuolinen
- Muu/en halua kertoa

15. Mikä on äidinkielenä? *

- suomi
- ruotsi
- muu

16. Valitsit muun, mikä? Jos olet kaksikielinen, voit mainita useamman kielen. (open)

Appendix 4 Finnish summary

Tässä pro gradu -tutkielmassa tarkastellaan monikansallisen yrityksen kielipolitiikkaa ja työntekijöiden näkemyksiä sen linjauksiin liittyen. Monikansallisia yrityksiä voidaan pitää monikielisinä jo pelkän määritelmänsä perusteella (Angouri 2013, 565), koska ne toimivat useissa maissa ja käyttävät todennäköisesti eri kieliä tai kielimuotoja. Monialainen kieleen keskittyvä kansainvälisen liiketoiminnan tutkimus tarkastelee kielellistä monimuotoisuutta kansainvälisessä liiketoiminnassa (Piekkari, Gaibrois ja Johansson 2022, 145). Tämä tutkielma osallistuu keskusteluun tutkimalla kielipolitiikkaa ja kielilinjauksien merkitystä kvalitatiivisesti ja monimenetelmäisesti.

Tutkielman tarkoituksena on ymmärtää kielipolitiikan toimivuutta suomalaisessa kansainvälisesti toimivassa yrityksessä ja erityisesti sitä, miten yksittäinen työntekijä kokee sen. Toimivuus tässä yhteydessä linkittyy siihen, kuinka hyödyllinen politiikka on ja kuinka hyvin se palvelee yksittäistä työntekijää tai yritystä kokonaisuudessaan. Aiempi tutkimus on käsitellyt tätä aihetta, mutta on tärkeää tuoda esiin työntekijöiden näkökulmaa. Suomalainen yritysmaailma on hyvin edustettuna viimeaikaisessa tutkimuskirjallisuudessa monikielisten käytäntöjen osalta (Tenzer, Terjesen ja Harzing 2017, 831). Tätä tiettyä yritystä tai tätä ajallista kontekstia Suomessa ei ole kuitenkaan ei ole vielä tutkittu.

Kohdeyrityksenä tässä tutkielmassa on suomalainen monikansallinen yritys, UPM-Kymmene Oyj:n (jatkossa ”UPM”). Yrityksen päätoimiala on metsäteollisuus, ja se on myös laajentanut toimintaansa biokemikaaleihin ja biopolttoaineisiin (UPM 2024). Yritys toimii 46 maassa maailmanlaajuisesti, ja sillä on tuotantoa 11 eri maassa. Tuotantolaitosten määrän mukaan UPM:n on toimittava vähintään 11 kielellä, joten jo sen perusteella yritys on monikielinen. Viime vuosina metsä- ja paperiteollisuus on ollut tarkastelun kohteena liiketoiminnan ympäristövaikutusten osalta. Nykyinen mediaympäristö Suomessa metsäteollisuuteen liittyen tekee tästä tutkimuksesta ajankohtaisen, sillä kielenkäyttö on keskeinen osa mediasuhteiden hoitamista. UPM:ää ei ole aiemmin tutkittu kielitieteellisen tutkimuksen näkökulmasta, mikä jättää aukon tämän tutkielman täytettäväksi.

Konsernin kielipolitiikkaa pyritään ymmärtämään mahdollisimman kokonaisvaltaisesti kyselyn ja tulkintaan pohjautuvan politiikan analyysin (*interpretive policy analysis, IPA*) (Yanow 2000) avulla. Tutkielmassa pohditaan vastausta seuraavaan kolmeen tutkimuskysymykseen:

1. Miten yksittäinen työntekijä kokee UPM:n kielipolitiikan?
2. Miten UPM sanoittaa kielipolitiikkansa?
3. Mitä yritys voisi ottaa huomioon kehittäessään tätä politiikkaa?

Ensimmäiseen ja toiseen tutkimuskysymykseen vastataan kyselyn ja IPA:n avulla. Näiden kahden kysymyksen analyysin perusteella voidaan löytää ratkaisuja kolmanteen tutkimuskysymykseen, eli mahdollisia keinoja politiikan jatkokehitykseen. Organisaation työntekijöiden näkemyksiä kartoitettiin 16-kysymyksisen kyselyn avulla. Kyselyssä kysyttiin muun muassa työntekijöiden tyytyväisyyttä konsernin nykyiseen kielipolitiikkaan, kielenkäyttöön heidän työssään ja kieleen liittyviä haasteita. Kyselyn vastauksia verrattiin konsernin kielipolitiikkaan mahdollisten epäjohdonmukaisuuksien tai ristiriitojen löytämiseksi. Tutkielman hypoteesina onkin, että yhtiön kielipolitiikka ei välttämättä vastaa kaikkiin henkilöstön kielellisiin tarpeisiin riittävästi kattavasti.

Toiseen tutkimuskysymykseen etsittiin vastauksia seuraavien kolmen metodin avulla: kielipolitiikkadokumenttien lähiluku ja kielipolitiikan luokittelu yhdistettynä tulkinnalliseen politiikan analyysiin. Kielipolitiikan analyysissa hyödynnettiin Johnsonin luokittelutapoja (2013, 10), jotka mahdollistivat politiikan kategorisoinnin sen ilmenemismuodon perusteella. Kolmanteen tutkimuskysymykseen puolestaan vastattiin kahden ensimmäisen tutkimuskysymyksen löydöksiä perusteella. Kielipolitiikan ja henkilöstön näkemyksien analysoiminen, eli kielipolitiikan mahdollisimman laaja-alainen ymmärtäminen, loi edellytykset tarjota yritykselle kehitysehdotuksia sen kielipolitiikkaan.

Kielipolitiikan määritelmä on monitulkintainen, ja termi on kompleksinen sekä suomeksi että englanniksi. Kielipolitiikkaa ovat esimerkiksi ”lait, säädökset, säännöt ja käytännöt”, jotka pyrkivät muuttamaan kielenkäyttöä millään tavalla (Kaplan ja Baldauf 1997, xi). Kielipolitiikkaa voidaankin pohjimmiltaan pitää interventiona kielenkäyttöön (Spolsky 2003, 8). Näin ollen kielen hallinta, kielilinjaukset ja -suunnittelu voidaan nähdä läheisesti kielipolitiikkaan liittyvinä termeinä (ibid.). Kaplanin ja Baldaufin (1997, xi) mukaan kielenkäytön suunnitteluun liittyvät toimenpiteet voivat johtaa kielipolitiikan luomiseen. Kieli-ideologiat ohjaavat kielenkäyttöä ja sen sääntelyä, ja myös tähän perehdytään tässä tutkielmassa.

Tässä tutkielmassa keskitytään erityisesti yrityskielipolitiikkaan. Sen tutkimiseen voidaan käyttää pitkälti samoja metodeja kuin kielipolitiikan tutkimuksessa laajemminkin. Kielipolitiikkaa ja -käytäntöjä voidaan luoda organisaatioissa ylhäältä alas tai alhaalta ylös, ja

ne voivat säädellä kielenkäytön eri osa-alueita. Yritykset voivat arvottaa kielisääntelyä ja -käytäntöjä eri tavoin. Ne voivat pyrkiä korostamaan kielellistä monimuotoisuutta tai pyrkiä yhtenäistämään kielenkäyttöä rohkaisemalla työntekijöitä käyttämään yhteistä *lingua franca* -kieltä, joka on usein englanti. Yrityksen äänensävy puolestaan viittaa siihen, miten viestin vastaanottajaa puhutellaan ja mitä strategioita organisaatio käyttää viestin välittämiseen (Oh ja Ki 2019, 321). Suurten yritysten käyttämät viestintästrategiat ja äänensävy liittyvät yritysten yhteiskuntavastuuseen (*corporate social responsibility, CSR*). Se liittyy monikansallisten yritysten vastuisiin, kuten velvollisuuksiin sidosryhmiä kohtaan, sosiaalisiin ja eettisiin vastuisiin sekä johtamisvastuisiin (Maignan ja Ferrell 2004, 4).

Kieli-ideologiat ovat rakennettuja ja rakentuneita tapoja, joita käytämme kielestä puhumiseen ja ajattelemiseen (Seargeant 2009, 26). Kieli-ideologiat vaikuttavat kielipolitiikkaan ja -suunnitteluun ja päinvastoin (Spolsky 2003, 14). Samoin kieliasteet vaikuttavat kieli-ideologioiden muodostumiseen (Palviainen ja Huhta 2015, 193). Asteet ovat subjektiivisia ja ohjaavat joskus tiedostamatta ihmisten päätöksentekoa (ibid.). Yksi keskeinen kieli-ideologia tässä tutkimuksessa on englanti *lingua francana* (*English as lingua franca, ELF*). Barbara Seidlhoferin (2011, 7) mukaan englannin kieltä käytetään ”kontaktikielenä” tilanteissa, joissa henkilöiden ainoa yhteinen kieli on englanti. Englanti liiketoiminnan *lingua francana* (*English as a business lingua franca, BELF*) pitää sisällään liiketoiminnan kielenkäytölle ominaisia piirteitä, mikä tekee siitä omanlaisensa kielivariantin ja -ideologian. Toinen vaihtoehto BELF-ideologialle on *monikielisyden* suosiminen. Monikielisyys on teoriassa BELF:n vastakohta.

Tutkielman kielipolitiikan analyysi perustui Dvora Yanowin (2000) tulkinnalliseen kielipolitiikan analyysiin, joka pyrkii politiikan tai linjausten kokonaisvaltaiseen ymmärrykseen. Tulkinnallisuuden ja subjektiivisuuden erityinen huomioiminen tutkimuksessa pohjautuu hermeettiseen tiedontuotantoon. IPA-viitekehys sisältää viisi vaihetta, joista kolme ensimmäistä olivat oleellisia tämän tutkielman kannalta. Ensimmäisenä Yanow (2000, 11) pyrkii tunnistamaan politiikkaan tai linjauksiin liittyvien yhteisöjen (*communities*) rakentumista ja rakenteita. Nämä yhteisöt voivat koostua esimerkiksi politiikkojen laatijoista, ihmisistä, joita politiikka koskettaa suoraan tai yhteiskunnallisesti relevanteista toimijoista. Toisena vaiheena analyysissä tutkitaan politiikkaan liittyviä artefakteja (*artifacts*) (Yanow 2000, 21). Näillä artefakteilla tarkoitetaan politiikalle relevanttien toimijoiden luomia tuotoksia, kuten konkreettiset politiikkadokumentit.

Kolmantena analyysissa tulkitaan politiikkaan liittyvää kielenkäyttöä, keskusteluja tai tilanteita (*discourses*), joissa yhteisöjen näkemykset käyvät ilmi. Näitä keskusteluja tai diskursseja päästiin tulkitsemaan kyselyn avulla. Neljäntenä analyysissa pyritään löytämään ja tunnistamaan mahdollisia konflikteja (*points of conflict*) kolmen ensimmäisen askeleen perusteella. Viidennessä vaiheessa analyysin pohjalta tehtyjen havaintojen avulla voidaan suorittaa väliintulo (*intervention*), esimerkiksi korjausehdotusten tekemisen ja toimeenpanemisen muodossa. Tämän tulkintaan perustuvan analyysin perusteella voidaan nimetä UPM:n kielipolitiikalle oleellisia ja ajankohtaisia kehitysehdotuksia.

Aineistona tutkielmassa hyödynnettiin UPM:n kielipolitiikkaa, nettisivuja sekä kyselyn vastauksia. Lisäksi analyysia syvensi organisaation Toimintaohjeiden (Code of Conduct) tutkiminen. Tutkielmaan sopivan yhtiön löytämiseksi otettiin sähköpostilla yhteyttä kolmeenkymmeneenkuuteen yritykseen. Yhtiö luokiteltiin monikansalliseksi sen perusteella, oliko sillä toimistoja sekä Suomessa että ulkomailla. Listaa ”Ulkomaalaisomistus osakkeista” (Euroclear Finland 2024) käytettiin viitteenä siitä, kuinka suuri osa yhtiön omistuksesta oli kansainvälistä ja kuinka suuri osa suomalaisomistuksessa. Lopulta UPM päätyi tutkielman kohdeyritykseksi.

Webropol-kysely jaettiin UPM:n viestintäosastolla, johon kuului noin 140 ylemmän tason työntekijää maailmanlaajuisesti. Kyselyyn saatiin 12 vastausta, ja siinä pyydettiin vastaajilta taustatietoja, mutta pienen otoskoon vuoksi näiden muuttujien välisiä eroja ei ollut mielekäästä vertailla keskenään. Näin ollen avoimien kysymysten analysointi osoittautui hedelmällisemmäksi. Suurin osa vastaajista puhui suomea äidinkielenään: suomi: 9, ruotsi: 1 ja muu, tarkennettu saksa: 2. Kysymyksessä 12 kysyttiin, kuinka kauan vastaajat olivat työskennelleet yrityksessä, ja kaikki olivat olleet osa yritystä yli 6 kuukautta. Tämä ei kuvaa heidän uransa pituutta, vaan osoittaa, että kaikki olivat työskennelleet nimenomaan UPM:ssä jonkin aikaa. Näin ollen useimmilla osallistujilla oli ollut mahdollisesti aikaa perehtyä erityisesti tämän yrityksen käytäntöihin ja toimintatapoihin.

Seuraavaksi tiivistetään kyselyvastausten pääteemat. Yleisesti ottaen asenne organisaation kielipolitiikkaa kohtaan oli positiivinen. Jotkut vastaajat toivoivat enemmän käännöksiä ja monikielisyyttä yrityksen viestinnässä sekä paikallisesti tuotantolaitoksissa että globaalisti. Eräs osallistuja sanoitti ajatuksensa seuraavasti: ”Ihmiset kaipaavat informaatiota ensisijaisesti omalla äidinkielellään, etenkin tehdas- ja tuotantotyössä, jossa englannin kielen osaaminen ei välttämättä ole niin yleistä.” Vastaajat esittivät näkemyksiä sekä yksityiskohtaisen

kielipolitiikan puolesta että sitä vastaan, mutta monikielisemmät käytännöt näyttivät olevan toivottuja.

Seuraavaksi tarkastellaan Johnsonin (2013, 10) nimeämää neljää kielipolitiikan luokittelutapaa. Ensimmäisenä tarkastellaan kielipolitiikan syntytapaa, eli onko politiikka kehitetty ylhäältä alas kuten johtotason linjaukset, vai alhaalta ylös kuten ruohonjuuritasolta nousevat tarpeet ja säännöt, jotka muodostuvat politiikaksi. UPM:n kielipolitiikan pääteltiin olevan syntynyt ylhäältä alas -prosessin kautta, sillä sen kehittäneet työntekijät olivat organisaation ylemmiltä tasoilta tai johtoasemassa. Toisaalta he olivat kuitenkin myös osa yhteisöä, jota kielipolitiikka koskettaa suoraan, ja heillä oli selkeä ymmärrys organisaation kielitarpeista. Toisena kategoriana Johnson (2013, 10) luokittelee kielipolitiikan keinoja ja tavoitteita sen perusteella, kuinka julkisesti ne ovat ilmaistu. Analyysin perusteella UPM:n kielipolitiikka on julkinen ja avoimesti ilmaistu.

Kolmas kategoria, dokumentointi, viittaa siihen, kuinka eksplisiittisesti tai implisiittisesti kielipolitiikka on ilmaistu kirjoitetuissa linjauksissa (Johnson 2013, 10). UPM:n kielipolitiikka on eksplisiittisesti ilmaistu kirjoitetussa tekstissä. Neljäntenä luokittelussa tarkastellaan sitä, perustuuko politiikka ”lakiin” (*de jure*) vai ”käytäntöön” (*de facto*). Tämä kahtiajako viittaa siihen, seurataanko asetettuja käytäntöjä, vai onko niiden rinnalla olemassa muitakin kielipolitiikkoja. Tämän tutkielman analyysin perusteella UPM:n kielipolitiikan voidaan katsoa olevan ”lakiin perustuva” eli seuraavan dokumentissa nimettyjä sääntöjä. Toisaalta voidaan myös olettaa, että kyseisen kielipolitiikkadokumentin ulkopuolella voi olla olemassa muitakin kielisäännöksiä tai -toimintatapoja.

UPM:n kielipolitiikka on saatavilla yhtiön sisäisillä verkkosivuilla, ja se sisältää tekstiä kahdella sivulla. Kielipolitiikassaan UPM luo hierarkioita kielten välille: kaksi virallista yrityskieltä, ensisijainen kieli ja ”pääkielet”. Englanti ja suomi ovat viralliset kielet, ja englanti on ensisijainen. Joko tämä kielipolitiikkadokumentti on ainoa kielipolitiikka, joka koko yrityksellä on, tai kuten politiikassa todetaan, vastuu siirretään yksittäisille liiketoiminnoille, ja ne ovat luoneet omat politiikkansa erikseen. Sana ”responsibility”, viitaten yksikön tai yksilön vastuuseen sisällön tuottamisesta, mainitaan kymmenen kertaa suhteellisen lyhyessä dokumentissa.

Yanowin IPA:n ensimmäisen vaiheen artefakteiksi tunnistettiin konsernin kielipolitiikka, nettisivut ja nettisivuilta löytyvät Toimintaohjeet (*Code of Conduct, CoC*). Artefaktit ilmentävät ihmisten ja organisaatioiden arvojen abstraktimpia merkityksiä. Artefaktit

erotellaan ja analysoidaan IPA:ssa, jotta LP ymmärretään laajemmassa kontekstissa. UPM:n verkkosivut sisälsivät paljon informaatiota konsernin toiminnasta, ja siitä oli useita kieliversioita. UPM tekee laaja-alaista brändityötä, ja verkkosivujen olennaisimmaksi dokumentiksi osoittautui yhtiön Toimintaohjeet. Toimintaohje on multimodaalinen dokumentti, joka muistuttaa muodoltaan diaesitystä sisältäen sekä tekstiä että havainnollistavia kuvia. Yhtiön CoC sisälsi joitakin kieleen liittyviä mainintoja, jotka ovat voineet vaikuttaa kielipolitiikan luomiseen.

Toisessa vaiheessa kielipolitiikkaan liittyvien yhteisöjen ymmärtämiseksi pohdittiin yhtiön sisäisiä ja ulkoisia yhteisöjä erikseen. Seuraava luettelo sisältää kielipolitiikkadokumentin juoksevassa tekstissä mainitut sisäiset yhteisöt: ”UPMers” (eli kaikki UPM:n työntekijät), tuotantotyöntekijät, johtajat, toimistotyöntekijät, globaalit projektijohtajat, sisällönomistajat ja nimetyt viestijät (”dedicated communicators”). Erityisesti kaksi viimeistä yhteisöä luettelossa ovat kiinnostavia tässä analyysissä, koska niitä ei määritellä tarkemmin kielipolitiikassa.

”Content owners” on häilyvä käsite, sillä sisällön omistajuus voi olla monitahoista.

”Dedicated communicator”-käsite on yhtä epävarma, koska näiden henkilöiden päättämisen tai nimeämisen prosessia ei ole määritelty asiakirjassa. Vaikka nämä yhteisöt voivat olla sisäisesti määriteltyjä yrityksen sisällä, kielipolitiikka ei itsessään tarjoa niille suuntaviivoja. Tämä viittaa osaltaan implisiittiseen tietoon, jota ei ole kerrottu itse dokumentissa.

IPA:n kolmannessa vaiheessa tutkitaan artefaktien välittämiä merkityksiä (Yanow 2000, 17). Yhteisöt antavat merkityksiä jäsenten toimille ja näiden toimien lopputuotteille. Nämä merkitykset ovat enimmäkseen symbolisia ja sidoksissa niiden erityiseen kontekstiin (ibid.). Termi toiminta viittaa tässä ”kielenkäyttöön” (van Hulst et al. 2024, 4) tai laajemmin diskurssiin. Nämä toimet voivat myös edustaa osia laajemmista yhteiskunnallisista diskursseista, ja ne voivat olla ideologian vaikuttamia. Pääsy näihin toimiin ja merkityksiin mahdollistui henkilöstöllä kierrätetyn kyselyn avulla.

Ensimmäiseen tutkimuskysymykseen vastattiin kyselyn perusteella. Yleisesti ottaen kyselyyn vastanneiden henkilöiden suhtautuminen organisaation kielipolitiikkaan oli positiivinen. Osa osallistujista toivoi enemmän käännöksiä ja monikielisyttä yrityksen viestintään, sekä paikallisesti tuotantolaitoksissa että globaalisti. Eräs vastaaja nosti esiin sen, että ihmiset tarvitsevat tietoa omalla kielellään, varsinkin tuotantoympäristössä, missä englantia ei välttämättä puhuta yhtä laajalti. Osallistujat esittivät näkemyksiä sekä kielipolitiikan puolesta että vastaan, mutta monikielisyys organisaatiossa vaikutti yleisesti toivotulta.

Toiseen tutkimuskysymykseen vastattiin kielipolitiikan lähilukemisella, jota seurasi tulkinnallinen politiikka-analyysi. Johtopäätösten tekeminen IPA:sta vaati artefaktien, yhteisöjen ja diskurssien sekä niihin liittyvien ideologioiden huomioonottamista. Yrityksen kielenkäyttöön liittyvien eri artefaktien tutkiminen on tuonut esiin kielipolitiikan keskeisiä näkökohtia. UPM:n kielipolitiikassa keskiössä on se *mitä* kieltä käytetään sen sijaan, että huomioitaisiin, *miten* kyseistä kieltä käytetään. Vaikka kielenkäyttö organisaatioissa on keskeistä niiden toimivuuden kannalta, työntekijöiden sääntelyn ja henkilökohtaisen toimijuuden tasapaino on edelleen haaste. Miten voimme ottaa huomioon kaikkien kielitarpeet? Yksi huomioonotettava näkökohta olisi useampien eri tasojen henkilöiden osallistuminen politiikan luomiseen. Osallistaminen ja vastuun jakaminen tasapuolisesti voisi auttaa luomaan toimivan politiikan.

IPA:n kautta tehdyt havainnot voivat viitata joihinkin kieli-ideologioihin. Nousevat teemat liittyvät BELF:iin, monikielisyys ja yritysten yhteiskuntavastuuseen. Mielenkiintoista on, että suomen kielen käytön merkitys erottui kyselyn vastauksissa. UPM:n edustajan haastattelun mukaan työntekijä, joka siirtyy Suomeen ilman aiempia kielitaitoja, kokee usein suomen kielen esteeksi integroitumisessa ja työpaikkavuorovaikutuksessa. Kyselyn vastaukset tukevat tätä näkemystä. Yrityksen työntekijöiden globaali liikkuvuus on laajaa, joten kielellinen monimuotoisuus ja mukautuminen tulisi tunnistaa. Kuitenkin yleinen mielipide viestinnässä käytetyistä kielistä näyttää olevan positiivinen satunnaisista haasteista huolimatta.

Kolmannen tutkimuskysymyksen vastaamiseksi on synteessissä käytettävä hyödyksi aiempien tutkimuskysymysten vastauksia. Yksi ehdotus yritykselle liittyy sen käyttämään äänensävyyn. Tällä hetkellä yrityksen äänensävyä ei ole määritelty kielipolitiikassa, mutta se mainitaan epäsuorasti Toimintaohjeissa. Yhtenä tästä tutkielmasta nousevana ehdotuksena UPM:lle olisi sisällyttää strategisia lausuntoja kielipolitiikkaan. Yritys voisi yhtenäistää viestintänsä määrittelemällä selkeän äänensävyn ja selittämällä konkreettisia tapoja sen ylläpitämiseksi. Organisaatio voi omaksua useita viestintätyylejä, mutta viestinnän tulisi kuitenkin olla johdonmukaista. Lisäksi on tarpeellista tunnistaa kieli-ideologioiden mahdollinen vaikutus kielipolitiikan luomisessa. Kielipolitiikka ja ideologia ovat erottamattomasti yhteydessä toisiinsa (Spolsky 2003, 14). Tämän tutkielman analyysin mukaan UPM on luonut politiikkansa BELF-ideologian mukaisesti, mutta tukee silti huomattavaa määrää muita kieliä. Monikielisyys UPM:ssä on ilmeistä, ja yritys on ottanut huomioon useita kieliä.

Tekoälyä, konekäännöstä ja koneoppimisen merkitystä ei voida sivuuttaa nykypäivän liiketoiminnassa. Kielipolitiikka saatiin yritykseltä vuonna 2024, ja on syytä uskoa, että se luotiin jonkin aikaa ennen vuotta 2024, jolloin tekoälyn käyttö oli vielä suppeampaa. Teknologinen kehitys on ollut nopeaa, ja digitalisaation vauhti on kiihtyvää (Jaumotte, Oikonomou, Pizzinelli ja Tavares 2023). Tämän globaalien trendien vuoksi jopa tällä hetkellä vuonna 2025 laaditut politiikat voivat vanhentua suhteellisen lyhyessä ajassa. Silti ohjeistus tekoälyn käytöstä kielessä ja viestinnässä on tärkeää, sillä yritykset ovat usein yhä enemmän sidoksissa tekoälytyökaluihin (Eurostat 2025). Näin ollen yksi vaihtoehto politiikan kehittämiseksi olisi luoda ohjeita ja strategia tekoälyn käytölle.

Tutkielman huomattavin haaste oli kyselyn pieni otoskoko. Vaikka kyselyyn osallistuneet kaksitoista vastaajaa antoivat tärkeitä näkemyksiä ja mielipiteitä, osallistujien määrä on silti liian pieni edustamaan yritystä tai edes sen viestintäosastoa. Koska kyselyn aiheena oli kielipolitiikka, jota ei ehkä laajalti käsitellä tai aktiivisesti pohdita päivittäisessä työssä, kyselylomakkeen laatiminen osoittautui haastavaksi. Kyselyn alussa oli annettava määritelmä termille, ja analyysissä on huomioitava, että määritelmä on voinut vaikuttaa vastauksiin.

Laajempia tuloksia voitaisiin saada haastatteluilla tai integroimalla tutkija yritykseen paremmin. Epätietoisuus siitä, milloin tai miten kyselyä jaettiin yrityksen sisällä, oli melko rajoittavaa. Toisaalta tutkijan suurempi osallisuus voisi tuoda mukanaan muita ongelmia, kuten objektiivisuuden heikentymistä. Tämä kuitenkin avaa mahdollisuuksia tulevalle tutkimukselle monikansallisten yritysten kielipolitiikan ja käytäntöjen tutkimisessa. UPM:n yleinen kiinnostus tutkimukseen on ilmeistä, sillä se on osallistunut useisiin tutkimuksiin ja tekee tutkimusta myös itse. Avoimuus tutkimukselle on arvokasta, ja sitä tulisi rohkaista enemmän yhteiskunnallisesti sekä monikansallisissa yrityksissä.

Tämä tutkielma on osittain käsitellyt Tenzerin, Terjesenin ja Harzingin (2017, 821) ehdottamaa tutkimusagendaa laajentamalla monikansallisen yrityksen yksilötason näkökulmia. Tutkielma on tarjonnut ainutlaatuisia näkemyksiä UPM:n kielipolitiikasta ja käsitellyt mahdollisia tarpeita kielipolitiikan tuleville parannuksille. Vaikka tuloksia ei voida yleistää laajempiin konteksteihin ja ne edustavat vain näiden muutaman henkilön ja tämän tietyn yrityksen kielipolitiikan mielipiteitä, tulokset ovat linjassa aiemman kielipolitiikan tutkimuksen kanssa.

Tämä pro gradu -tutkielma osallistuu kansainvälisten yritysten kielipolitiikan moninaiseen ja monialaiseen keskusteluun. Tutkielman ansiosta kohdeyritys voi harkita sille esitettyjä

kehitysehdotuksia. Tuleva tutkimus voisi käyttää pitkittäistä lähestymistapaa ja esimerkiksi tarkkailla, miten muutokset kielipolitiikassa vaikuttavat työntekijöiden tyytyväisyyteen tai jopa yrityksen taloudelliseen suoriutumiskykyyn. Toinen mahdollisuus jatkotutkimukselle olisi suorittaa laajempi kysely tai haastatteluja yhtiössä.

Kielipolitiikan tulisi perustua yrityksen laajempiin strategioihin ja olla tavoitteellista ainakin jossain määrin, sillä se ei ole olemassa tyhjiössä. Implisiittinen tieto ei ole kaikkien saatavilla, ja läpinäkyvyys on tärkeää, erityisesti yhteisön uusille jäsenille. Tämän tutkielman tuloksia voitaisiin käyttää alustavana kartoituksena yrityksen kielipolitiikan nykytilanteesta. Se toimii ponnahduslautana politiikan ja kielihallinnan tuleville muutoksille. Kuten aiemmin todettiin, tutkimus ei pyri tarjoamaan konkreettisia ratkaisuja. Tämä tutkielma on luonut organisaatiolle reflektiivisen mahdollisuuden tarkastella kielikäytänteitään, ja tarjoaa työkaluja UPM:n kielenhallinnan ymmärtämiseen.