

Group statement

Modern slavery statement

NTT Ltd

19 March 2024 | Document Version 0.01

Zellah Fuphe

Zellah.fuphe@global.ntt

Contents

1.	Introduction	5
2.	Our Organization	6
3.	Supply Chains	7
4.	Policies in relation to slavery and human trafficking	8
5.	Our supplier requirements	9
6.	Risk assessment and management	10
7.	Training	11
8.	Key performance indicators to measure effectiveness of steps being taken	12
9.	Board Approval	14

List of abbreviations

Abbreviation	Meaning

Document history

Issue	Date	Comments	Pages Affected
1.00		Original	All
2.00			

Message from Zella Fuphe, Chief Risk and Sustainability Officer (CRSO), NTT Ltd.

NTT Ltd. (NTT) will ensure that we do not knowingly participate in any activity or organization that involves any form of modern slavery.

We maintain a long-standing commitment to respecting human rights, including the elimination of slavery and human trafficking in our supply chain and business operations. We welcome the transparency that the Modern Slavery Act encourages.

We realize that modern slavery is a complex and growing global issue that affects millions of people around the world. NTT is committed to ensuring that we have the right policies, processes and procedures in place to protect our organization and people. Further, and as importantly, we seek to foster an environment where respect for the individual and their rights is a core value.

We encourage any individual who has concerns about the alignment of our operations to this statement or unethical behavior in any part of our business or operations to speak up, and to do so without fear of retaliation.

This statement, which is made in accordance with the UK Modern Slavery Act 2015, is our third under the Act and is applicable relates to the financial year ending 31 March 2024. We fully support the aims of the Act and associated standards, such as the UN Guiding Principles on Business and Human Rights, and are committed to tackling slavery and human trafficking wherever we can.

Zella Fuphe

Chief Risk and Sustainability Officer, NTT Ltd.

1. Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person of their liberty and dignity for another person's gain. It is a real problem for millions of people around the world, who are being kept in and exploited under various forms of slavery.

At NTT, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our operations and supply chain. We have taken concrete steps to tackle modern slavery, as outlined in this statement.

This statement, which is in line with requirements that are set out under section 54, part 6, of the United Kingdom (UK) Modern Slavery Act 2015, applies to all NTT Companies for the financial year ending 31 March 2024.

1.1. Our Modern Slavery Framework entails the following:

- 1.1.1. Visibility – having a good understanding of high-risk industries, high risk locations and supply chain complexity in our business.
- 1.1.2. Policy – having a policy framework that addresses human rights and ethical topics in our business.
- 1.1.3. Remedies and solutions – risk assessments for pro- active approach and confidential reporting channels available internally and externally to investigate any suspected concerns or violations.
- 1.1.4. Transparency and accountability - reporting of metrics in relation to our defined key performance indicators.

1.2. Our approach to combatting Modern Slavery entails the following:

- 1.2.1. Commit to the combatting of Modern Slavery by adoption and annual review of this statement and related policies by our Board of Directors;
- 1.2.2. Enable our people to assess risks by providing tools and training to facilitate risk assessments and identification of ethical concerns slavery concerns;
- 1.2.3. Take action by strengthening risk assessments and risk response practices, programs and tools to identify, investigate and mitigate any associated modern slavery risks.

2. Our Organization

NTT is a leading, global technology services company. To help our clients achieve their digital transformation goals, we use our global capabilities, expertise and full-stack technology services, delivered through our integrated services platform.

As their long-term strategic partner, we help them enhance their customer and employee experience, transform their cloud strategy, modernize their networks and strengthen their cybersecurity. And, across their transformation priorities, we automate their business processes and IT, drawing insights and analytics from their core business data.

As a global ICT provider, we employ more than 50,000 people across 57 countries, trade in 73 countries and deliver services in over 200 countries and regions. Together we enable the connected future.

3. Supply Chains

We collaborate with the industry's most trusted strategic alliance partners to provide access to the latest technologies and premium technical support. This allows us to provide specialist technology infrastructure solutions. Our supply chains include providers and resellers of voice and data networks, and a broad range of ICT products and services, including hosting.

We aim to establish a relationship of trust and integrity with all our suppliers, built upon mutually beneficial factors.

During May 2022 we launched our Supplier Code of Conduct which is based on the NTT Group Guidelines for Sustainability in Supply Chain. NTT will contribute to realizing a sustainable society by doing procurement with the emphasis on human rights, the environment, safety and other critical issues, in compliance with laws and social norms.

These Guidelines describe matters that each company in our supply chain should actively address in order to realize a sustainable society. The term 'supplier' refers to any business entity that provides products, people, or services to the NTT Group.

We haven't been made aware of any allegations of human trafficking or slavery activities against any of our suppliers. In the event that we were to be made aware of such, we would act immediately against the supplier and report them to the authorities.

4. Policies in relation to slavery and human trafficking

We expect our employees to work in accordance with our business values and principles.

Our policies and procedures ensure that our employees have appropriate employee rights and are employed in accordance with applicable legislation. We provide online training and access to all our policies, which are readily available to employees on our Governance, Risk and Compliance SharePoint site. Should an employee fail to meet the standards expected by NTT, we will fully investigate the matter in line with the relevant terms of employment and disciplinary procedures. If needed, we will take appropriate disciplinary action.

NTT has the following policies for identifying and preventing slavery and human trafficking in our operations:

- **Code of Conduct and Business Ethics:** Our code encourages employees to do the right thing even when no one is looking. It clearly states the actions and behavior expected of them when representing NTT. We strive to maintain the highest standards of employee conduct and ethical behavior when operating abroad and when managing our supply chain.
- **SpeakUp Policy:** We encourage all employees, clients and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a 24/7 confidential SpeakUp service to protect the identity of reporters.
- **Supplier Code of Conduct:** We expect our suppliers to operate in line with the standards set out in the Supplier Code of Conduct, which also provides details of the SpeakUp service that NTT has in place for employees, contractors and suppliers. Suppliers will therefore have an anonymous route to report modern slavery or other concerns about NTT's supply chain.
- **NTT Group Guidelines for Sustainability in Supply Chain** (NTT Corporation).
- **Third Party Risk Management (TPRM) program:** We are in the process of implementing enhanced diligence through the deployment of TPRM enabling technology.

5. Our supplier requirements

Under our Supplier Code of Conduct, we require that:

- Suppliers don't use any form of forced labor
- Suppliers respect the human rights of workers and shall not subject them to inhumane treatment
- Suppliers shall not employ children who are under the minimum working age as defined by the International Labour Organisation or as defined local law, whichever is higher
- Suppliers shall not employ children who are under the minimum working age as defined by the International Labour Organisation or as defined by local law, whichever is the higher.
- Suppliers shall comply with all applicable legislation regarding compensation paid to workers
- Suppliers must not allow workers to work beyond limits defined by legislation in the country where they work and shall appropriately manage working hours and holidays of workers considering international standards set by the international standards set by the International Labor Organization
- Suppliers shall comply with local legislation, and respect the worker's rights to freedom of association and collective bargaining
- Suppliers who supply raw materials as part or provide services shall conduct human rights due diligence as necessary in order to check that there are no such violations.

6. Risk assessment and management

We are committed to identifying and addressing modern slavery that could be connected to both our business and supply chain. Due to the controls and practices we've adopted, as well as the planned enhancements (the TPRM program), we believe the risk of modern slavery in our business is very low.

As a global technology services company, we believe that Modern Slavery risk within our organization is medium to low. The majority of workers employed by NTT are skilled workers and our supply chains are uncomplex, and mostly will be directly with the Original Equipment Manufacturer. Levels of unskilled labour amongst our suppliers are also negligible. Although we do operate in countries that may have greater exposure to Modern Slavery risks, we believe the overall risk within NTT ~~is still~~ remains low, given our negligible use of unskilled workers.

There is a greater use of unskilled workers in our data center operations, where unskilled laborers may be involved in construction work, for example. However, this work is largely outsourced and NTT has vigorous checks and balances in place to ensure fair treatment of all unskilled laborers as well as vigorous due diligence processes in the appointment of any third party.

7. Training

NTT raises awareness of modern slavery issues through onboarding, communication and annual mandatory training that focuses on our Code of Conduct and Business Ethics.

Our Code and our Modern Slavery and Human Trafficking Policy highlight our commitment to the fight against modern slavery, how we deal with potential red flags for cases of slavery or human trafficking, and how employees should report suspicions of modern slavery.

We require all new and existing employees to complete our mandatory training within 60 days of their date of enrollment.

8. Key performance indicators to measure effectiveness of steps being taken

8.1. Current actions

NTT has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organization and supply chain. These include:

- Number of employees who have completed the mandatory training gives us an indication that our employees understand our position on and the risks associated with modern slavery and human trafficking (Insert % of employees that completed COC training)
 - 92% of employees completed our Code of Conduct training for the financial year ending 31 March 2024, which including the specific topic of Modern Slavery.
- Remedial actions implemented following reports made by our employees relating to ethical matters, gives an indication of how we respond to ethical concerns
 - Zero (0) reports of Modern Slavery or labor abuse were reported in relation to NTT or any of its suppliers for the financial year ending 31 March 2024.
- Our enhanced controls following reports of an ethical nature also give evidence of how we combat risks that may relate to modern slavery and human trafficking.
 - Given zero reports of any Modern Slavery incidents, no control improvements were identified for this financial year.
- Our continued assessments of the Modern Slavery landscape across our business give an indication of changes to risk materiality and required improvements in those areas.
 - A high level risk assessment was conducted in January 2024 to assess highest areas of Modern Slavery Risk in the business.
 - NTT has committed to joining international governance bodies which provides for knowledge sharing and tools for in relation to human rights and modern slavery topics.
 - NTT joined the Sustainable Business Network and Consultancy in the financial year ending 31 March 2024.

8.2. Future actions

8.2.1. Due diligence

- We currently undertake due diligence when considering new suppliers and regularly review existing suppliers. We have taken the approach to conduct due diligence at a group level through the development of a group wide Third-Party Risk Management tool. The tool has been under development during the course of the financial year ending 31 March 2024, and we are currently piloting the tool in four countries. Piloting will continue into the first quarter of the financial year ending 31 March 2025.

The TPRM program will assess risks specific to Modern Slavery, including the following:

- Geographical location risk of where the supplier is situated
- Policies and training communicated by the Supplier to their staff
- Employment of child workers
- Restriction of employee movements
- Working hours, overtime and basic minimum pay
- Any human rights or modern slavery incidents or reports raised in the Supplier's organization.

8.2.2. Improvement of metrics and risk assessments

- NTT will explore how technology can be used to better scrutinize and assess supply chain complexities as well as recruitment chain complexities.
- NTT will also explore how due diligence can be conducted for new and existing clients, to assess whether clients operate in high-risk industries or locations.

8.2.3. Streamlined training

- Based on risk self- assessments, NTT is currently identifying areas of the business that would benefit from streamlined Modern Slavery training in the financial year ending 31 March 2025.

9. Board Approval

This statement was approved by the NTT Ltd board on the 18 March 2024 for the financial period 1 April 2023 to 31 March 2024.

Policy Owner: Zella Fuphe,
Chief Risk and Sustainability Officer,
Risk Management & Sustainability