



Group Policy

Code of Conduct and Business Ethics

NTT Limited

01 June 2023 | Document Version 4

Risk and Sustainability Zellah.fuphe@global.ntt

Information Asset Classification: General

Document Control

Document Name	NTT Limited Code of Conduct and Business Ethics
Document Owner	Zella Fuphe, Chief Risk and Sustainability Officer
Document Storage	https://nttlimited.sharepoint.com/sites/NTT-RiskManagement/SitePages/Compliance-and-Ethics.aspx
Last Reviewed	April 2023
Next Review Date	June 2024
Approved by	Zella Fuphe, Chief Risk and Sustainability Officer
Version on release	V4

Date	Version	Comments
March 2020	V 1.0	Published
December 2020	V 1.1	Revised draft
March 2021	V 1.2	Marilyn Chaplin, Sean Meisel, Marian Scala, Ashleigh van Kerckhoven review
April 2021	V 1.3	Revised Draft
August 2021	V 2.0	Published
June 2022	V2.1	Annual Review
July 2022	V 3.0	Published
February 2023	V3.1	Annual review and further review to align to NTT Data Code of Conduct and inclusion of Accessibility and Inclusion
June 2023	V4	Published

Supporting Policy or Documentation	Owner
SpeakUp Policy	Zella Fuphe, Chief Risk and Sustainability Officer
Anti-Bribery and Corruption Policy	Zella Fuphe, Chief Risk and Sustainability Officer
Conflict of Interest Policy	Zella Fuphe, Chief Risk and Sustainability Officer
Gifts and Hospitality Policy	Zella Fuphe, Chief Risk and Sustainability Officer
Referral Fee Policy	Larry Levin, Executive Vice President, Group Legal
Acceptable Use Policy	Darren O'Loughlin, Group Chief Information Security Officer
Information Security Policy	Darren O'Loughlin, Group Chief Information Security Officer

Data Privacy and Protection Policy	Ashleigh van Kerckhoven, Vice President Data Privacy and Protection, Group Governance and Risk
Data Subject Rights Policy	Ashleigh van Kerckhoven, Vice President Data Privacy and Protection, Group Governance and Risk
Personal Data Breach Notification Policy	Ashleigh van Kerckhoven, Vice President Data Privacy and Protection, Group Governance and Risk
Anti-Money Laundering Policy	Zellah Fuphe, Chief Risk and Sustainability Officer
Workplace Surveillance Policy	Darren O'Loughlin, Group Chief Information Security Officer
Social Media Policy	Julie Moon, Group Senior Vice President, Marketing and Corporate Communications
External Communications Guidelines	Julie Moon, Group Senior Vice President, Marketing and Corporate Communications
Competition Law Compliance Policy	Larry Levin, Group Executive Vice President, Legal
Group Authorities Matrix	Larry Levin, Group Executive Vice President, Legal
NTT DATA Group Code of Conduct	Toshi Fujiwara, Representative Director, Senior Executive Vice President, Chief Risk Officer

A message from Abhijit Dubey

At NTT, we pride ourselves on our reputation for conducting business in an ethical, open, and honest way and in accordance with the NTT group's shared values of Trust, Integrity and Connecting. We are a trustworthy human company that believes in the value of diversity and inclusion in our people and the world. Our Code of Conduct and Business Ethics ('our Code') guide our actions in conducting business and distinguishes us in the eyes of our people, clients, and communities.

In short, our Code helps us to:

1. **Empower our people to SpeakUp:** We want to create a culture where our people always feel empowered to do the right thing. We want their voice to be heard when they see unethical behaviour or misconduct and to feel safe to report wrongdoing.
2. **Ensure we are a responsible business:** We put people first, always showing respect when interacting with each other. We welcome ideas from all, harnessing diversity and ensuring inclusion to create a more sustainable, better world that helps all our people, clients, and communities to thrive.
3. **Act with integrity:** We take ownership and hold ourselves and others accountable and do the right thing even when no one is watching.
4. **Manage information risk:** We enable a secure and connected future by using "tech for good" and embedding security and privacy in everything we do.

It is essential, therefore, that all our people adhere to the same ethical standards that NTT upholds. In a competitive global environment, we may encounter situations that will test our judgment and integrity. When those situations arise, we can use our Code to help us answer the following questions before we act:

- Is this action legal, ethical, and socially responsible?
- Is this action in line with our Code and policies?
- Is this action in line with NTT's share values?
- Am I authorized to take this action according to my job description?
- How does this action reflect upon NTT's reputation?
- Could this action be disrespectful, hurtful or inappropriate to others?
- Would I be comfortable if this action were reported in news headlines?

I encourage you to read and understand our Code. When faced with an ethical dilemma, we have a responsibility to take action – to do the right thing, not the easy thing. SpeakUp if you see or suspect any activity that violates our Code or makes you feel uncomfortable. Never hesitate to seek help if you are faced with legal, compliance, or ethical issues.

Sincerely

[Abhijit Dubey](#)



Table of Contents

Document Control 2
1. Introduction 7
1.1. Purpose 7
1.2. Our Code Applies To Everyone at NTT 8
1.3. Local Laws, Regulations, and Customs 8
1.4. Non-Compliance With Our Code..... 8
1.5. Training..... 8
1.6. Audit and Compliance 9
1.7. Continual Improvement and Review 9
2. Our Culture and How We Behave 10
3. Your Responsibilities and Speaking Up 11
3.1. Your Responsibilities 11
3.1.1 Act within the limits of your authority 12
3.2. SpeakUp 12
3.3. Additional Policies 13
3.4. Our Dress Code..... 13
4. Being a Responsible Business 14
4.1. Diversity, Equity and Inclusion At Work..... 14
4.2. Health, Safety and Security in the Workplace 15
4.2.1 Possession of weapons in the workplace..... 15
4.2.2 Substance, drug, and alcohol-free workplace..... 15
4.3. Accessibility and Inclusion 15
4.4. Harassment, Bullying and Discrimination 16
4.5. Sustainability and Social Responsibility 18
4.6. Human Rights and Modern Slavery 18
4.6.1 Human rights 18
4.6.2 Modern slavery 19
5. Acting with Integrity 20
5.1. Internal Controls, Audit, Fraud and Company Assets..... 20
5.2. Third Party Relationships 21
5.3. Anti-Bribery and Corruption..... 22
5.4. Conflict of Interest 23



- 5.5. Gifts and Hospitality 24**
- 5.6. Donations..... 25**
 - 5.6.1 Support for Political Organizations25
 - 5.6.2 Support for Charitable Organizations25
- 5.7. Truth in Advertising, Marketing and Go-To-Market..... 25**
- 5.8. Anti-Trust and Competition..... 25**
- 5.9. Competitive Intelligence and Market Analysis 27**
- 5.10. Insider Trading 27**
- 5.11. Public Sector Clients and Contracting 28**
- 5.12. Anti-Money Laundering and Exclusion of Anti- Social Forces 28**
- 5.13. International Trade Compliance..... 29**
- 5.14. Government Requests and Subpoenas..... 29**

- 6. Managing Information Risk..... 30**
 - 6.1. Confidentiality and Information Security 30**
 - 6.1.1 Acceptable use30
 - 6.1.2 Workplace surveillance.....31
 - 6.2. Data Privacy and Protection..... 31**
 - 6.3. Technology Ethics..... 32**
 - 6.4. Intellectual Property..... 33**
 - 6.5. External Communications 33**
 - 6.6. Social Media..... 34**
 - 6.6.1 Social media – business use.....34
 - 6.6.2 Social media – personal use34

- 7. Concluding Thoughts 35**

1. Introduction

NTT Limited and each of its subsidiaries and affiliates ('NTT', 'we', 'us', 'our') are here to enable the connected future. Through technology and innovation we deliver a secure and connected future that empowers our people, clients, and communities.

This Code shall be read in conjunction with [NTT DATA Group Code of Conduct](#).

We want to create a more sustainable, better world that helps our communities thrive. We are purpose-led and performance-driven and pride ourselves on our reputation for conducting business in an ethical, open, and honest way, in line with our core values, and commitment to high standards, laws and regulations. Our values and Code of Conduct and Business Ethics ('our Code') guide our actions in conducting business in a sustainable, socially responsible. And ethical way.

We need to ensure that we act with integrity and conduct our business ethically with respect for all our people and the clients for and communities within which we work. This will distinguish us in the eyes of our people, clients, and communities.

It is essential, therefore, that all our people adhere to the same ethical standards and values that NTT upholds. This is key to protecting our brand and reputation and collectively building a purpose-led and performance-driven organization. As a company and as individuals, we respect the law and each other, protect the environment, achieve professional excellence, and benefit the communities in which we work.

1.1. Purpose

The purpose of our Code is to help us:

- create an honest and ethical culture that empowers our people to do the right thing and feel comfortable to SpeakUp when they see unethical conduct;
- create a purpose-led organization that is inclusive, celebrates diversity and brings together the best skills, resources, and minds to create a more sustainable, better world that helps our people, clients and communities thrive;
- hold ourselves and others accountable and do the right thing even when no one is watching; and
- enable a secure and connected future by using "technology for good" and embedding security and privacy in everything we do.

1.2. Our Code Applies To Everyone at NTT

Our Code of Conduct has been adopted by the board of directors of NTT Ltd and constitutes an official code that is adopted by the board of directors, or an equivalent decision-making body of each subsidiary in the NTT Ltd Group.

We have also adopted the [NTT DATA Group Code of Conduct](#). Please review the entire NTT DATA Group Code as well, which can be found on the NTT DATA Group website. Our Code is designed to be congruent and complementary with the NTT DATA Group Code.

Our Code applies to all NTT employees, executives, directors, and contractors ('our people', 'employees', 'you', 'your') and third parties (including joint ventures, vendors, suppliers, service providers, partners and consultants) worldwide. We are all responsible for ensuring that we understand our Code and uphold the ethical standards of NTT, in all that we do.

1.3. Local Laws, Regulations, and Customs

We comply with applicable laws and regulations in the countries and regions where we do business, and we have zero tolerance for any form of corporate criminal offences and illegal misconducts. Furthermore, we respect international standards and act in a highly ethical manner, in accordance with the social responsibility expected of a global company. These are our fundamental principles of behaviours necessary for us to gain trust from society, enhance our corporate values, and safeguard our own sustainable development.

We engage in our day-to-day business activities always in accordance with our fundamental principles.

Where local laws, regulations, applicable industry codes or business-specific standards are stricter than our Code, or prohibit any activities outlined in our Code we comply with the relevant laws and regulations. However, if local business practice (i.e., norms and customs, not legal requirements) conflicts with our Code, we follow our Code to ensure that we are conducting ourselves in an ethical way.

We are all expected to comply with both the letter and the spirit of our Code and the laws and regulations that apply to our business. It is important that you are aware of, and never intentionally violate, relevant laws and regulations. Violating relevant laws, regulations, or our Code, or encouraging others to do so, exposes NTT to risk and possible reputational damage.

1.4. Non-Compliance With Our Code

Failure to comply with our Code, the NTT DATA Group Code of Conduct, NTT policies and any applicable legal and regulatory requirements may result in disciplinary action and/or any action permitted under law, up to and including dismissal.

Violations of laws and regulations may also result in legal proceedings and penalties, including civil and criminal penalties that could affect you personally, in addition to the adverse consequences to NTT.

1.5. Training

We are committed to building a transparent and ethical culture that ensures that our people and third parties act with integrity in all that we do.

All of our people and third parties must be aware of, understand and follow our Code.

Our people will be expected to complete annual mandatory training on our Code. In particular, all new employees will be required to complete mandatory training on our Code during induction.

1.6. Audit and Compliance

Compliance with our Code is monitored on a periodic basis and reported to the NTT Ltd. Board, Group Audit and Risk Committee, Group Risk and Compliance Committee and senior management.

1.7. Continual Improvement and Review

Our Code is monitored and updated by Group Risk and Sustainability at least annually.

2. Our Culture and How We Behave

In a dynamic, rapidly changing world, it is our people who are the heart and soul of our company and make everything happen.

Our behaviours reflect our culture and help to ground us by guiding our day-to-day actions with each other, our clients and our communities:

- We are **people centric** - finding strength in diversity, and include everyone: together, we innovate better, so we welcome ideas from all.
- We are **client focused** – putting our clients at the center of all that we do and use our global capabilities and local insight to help them achieve their ambitions.
- We **make a difference** - working to create a better and more sustainable world that helps our communities to thrive.
- We are **accountable** - we do the right thing, even when no-one is watching and we hold ourselves accountable and empower our teams to take ownership, be more agile and to see things through to completion.
- We are **innovative** - curious and always eager to learn, as this attitude is what keeps us fast, flexible, and relevant, always ready to take bold steps into the future.
- We are **team oriented** - we do all this while pursuing excellence and having fun. Together we do great things.

These are underpinned by and aligned to the values and behaviours of NTT Holdings: **integrity, trust, connect.**

Our Code holds these behaviours at its heart and provides important guidance to each of us when we conduct our day-to-day business activities.

3. Your Responsibilities and Speaking Up

We want to create an ethical culture that empowers our people to do the right thing and feel comfortable to **SpeakUp** when they see illegal behaviour or misconduct.

3.1. Your Responsibilities

The purpose of our Code is to set out what is expected of all our people in order to ensure that our actions are always in line with our values and that we maintain the trust of the clients and communities with whom and within which we work. Each of us must think about how we behave, the risks associated with our role and how to manage them in line with our Code.

We hold ourselves accountable for our actions and expect you to:

- At all times act in a way that supports our values and those of NTT Holdings, our Code and our policies, standards, and processes;
- Read and understand our Code;
- Read and understand our policies, standards and processes and your responsibilities;
- Comply with relevant laws and regulations that apply to our business and your role;
- Act within the limits of your authority;
- Complete your annual mandatory compliance training when required;
- Know where to find our Code and who to contact in need;
- Look out for business conduct and ethics updates;
- Reach out to your line manager, HR, local Governance, Risk and Compliance or Legal team, or Group Risk and Sustainability if you have any questions; and
- **SpeakUp** when you see illegal behaviour or misconduct in the business.

Our Code helps guide our conduct when doing business. Many of the principles described in our Code are general in nature and do not address every situation that may arise. Use common sense and good judgement when applying our Code and seek guidance where you have questions.

Before taking any action, you should consider the following questions:

- Is this action legal, ethical, and socially responsible?
- Is this action in line with our Code and policies?
- Is this action in line with NTT's share values?
- Am I authorized to take this action according to my job description?
- How does this action reflect upon NTT's reputation?
- Could this action be disrespectful, hurtful or inappropriate to others?
- Would I be comfortable if this action were reported in news headlines?

3.1.1 Act within the limits of your authority

In addition to understanding and following our Code, each of us must understand the level of authority of our position. You must be careful to act within the limits of that authority, as defined in the various authorities' matrices applicable to each area of our business.

You may only bind NTT to contract terms if you are authorized to do so by your job title and function, as defined in the authorities' matrix. You must not act, or appear to act, on behalf of NTT beyond the scope of your role.

Our [NTT Group Authorities Matrix can be found here](#).

If you need to refer to your local authorities' matrix, please reach out to your line manager.

3.2. SpeakUp

Each of us has a duty to SpeakUp promptly if we suspect that anyone in NTT has violated our policies or our Code or are acting in a way that is not in keeping with our values. We rely on each of you to SpeakUp and tell us about any known or suspected misconduct or illegal behaviour so that we can act to protect our people, clients, communities, and NTT.

Report any activity that you feel is unethical, unsafe or that could damage our reputation by contacting one of the below:

- Your line manager;
- Your HR team;
- Your local Governance, Risk and Compliance or Legal team;
- Group Governance, Risk and Compliance: business.conduct@global.ntt ; or
- Our 24/7 anonymous and confidential SpeakUp platform as follows:
 - For our people: www.speakupfeedback.eu/web/ntt
 - For our clients, third parties or other external stakeholders: www.speakupfeedback.eu/web/nttexternals

As an alternative to the above, you may report directly to the NTT DATA Global Whistle Line by sending an email to NTTDATA_whistleline@ogaso.com.

We are committed to ensuring that when you SpeakUp you remain anonymous and that the information in your report is kept confidential and shared only on a need to know basis. We ensure that we have established processes in place to investigate SpeakUp reports and that investigations are performed by qualified personnel who have been trained to conduct investigations ethically, lawfully, confidentially, and professionally.

We operate a strict non-retaliation policy for all reports made honestly and in good faith, meaning that any act or threat of retaliation for reporting concerns (such as dismissing, transferring, demoting or publicly attacking someone) will not be tolerated and will be treated as a serious violation of our Code.

3.3. Additional Policies

Our Code is not the only source of guidance and information about how we do business. Our policies, standards and processes also provide guidance about specific activities in our business. You are responsible for ensuring that you have read, understood and act in accordance with our policies and those policies that apply to your role.

We have a dedicated [Business Conduct and Ethics Portal](#) that includes our key business conduct and ethics policies and guidelines, our Code, additional resources and links to key policies and portals.

3.4. Our Dress Code

Our dress code policy is designed to provide a consistent and appropriate appearance to our clients, partners, and colleagues. It is important because our appearance reflects on ourselves and our business. The goal is to be sure that we maintain a positive appearance and do not offend anyone.

We should at all times:

- present a clean and professional appearance. Everyone is expected to be well groomed and wear clean clothing, free from holes, tears, and signs of wear;
- avoid wearing clothing with inappropriate or offensive slogans and graphics and/or clothing that is too revealing; and
- dress appropriately for the work situation. For example:
 - If you are visiting a client, where their dress code is more formal, then please adopt a more formal dress code.
 - If you are in the office, for internal meetings, adopt a more casual style, but still neat.
 - If you are working from home, attending video conferences, a more relaxed style is appropriate, while still respecting your colleagues.

Each of us must use our own judgment in the choice of clothing to wear to work. If you are uncertain about what is acceptable, professional business attire for a client, the office or working from home reach out to your line manager or local HR team for guidance. The general rule is that if in doubt; always choose to dress up rather than down.

4. Being a Responsible Business

We are purpose-led and “Together we enable the connected future”.

This means that we:

- collaborate with our people, clients, and communities to make the world a better place through technology
- enable our people, clients, and communities to fulfil their potential in a constantly changing world
- celebrate our differences and strive to be an inclusive and diverse organization that brings together the best skills, resources, and minds
- connect people, ideas, and technology to ensure we make a difference to the world today and a sustainable future for the next generations

4.1. Diversity, Equity and Inclusion At Work

Equity and inclusion are crucial to the wellbeing of our people and each of us is responsible for creating a culture of trust and respect that promotes a positive work environment, free from discrimination of any kind. In doing so, we create a culture that promotes collaboration and allows everyone to fulfil their potential.

For us to continuously succeed, we need to make the most of our diverse people. We need to attract the right skills and the best resources and minds – we can only do this if we leverage our diverse workforce and celebrate our differences.

We are committed to the principles of equal employment opportunity, inclusion and respect and have a zero-tolerance policy for any form of discrimination in the workplace. We prohibit discrimination in employment, employment-related decisions or in our business dealings based on an individual's:

- race and ethnicity;
- ancestry;
- nationality, citizenship or place of birth;
- socio-economic background;
- religion and philosophical beliefs;
- political affiliation and beliefs;
- age;
- language;
- sex, gender, and sexual orientation;
- marital status;
- social status;
- family structure or lifestyle;
- pregnancy;

- state of health and disability; or veteran status.

No form of discrimination, harassment or offensive behaviour will be tolerated.

4.2. Health, Safety and Security in the Workplace

Health and safety is defined as the actions we complete with our people to promote a safe workplace environment, along with safe methods of working and safe colleagues, to prevent illness and injury at work. NTT is committed to risk-based health and safety management, where our people at each level of NTT shall assume responsibility for those aspects of health and safety over which they have control.

All incidents with a real or potential health and safety consequence shall be reported immediately. We strive to learn from incidents to help prevent them happening again.

4.2.1 Possession of weapons in the workplace

Possession of weapons on the job or on NTT's premises is prohibited.

4.2.2 Substance, drug, and alcohol-free workplace

We strive to maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol and/or controlled substances. These substances shall not be used in a manner that impairs a person's performance of assigned tasks or impedes generally acceptable social behaviour. Illegal substances in the workplace are not tolerated.

Where alcohol is used on work premises for internal work-related events, use of alcohol by employees must be responsible and alcohol must not be abused. Accountability for the responsible use of alcohol will lie with each individual employee, who must at all times act in accordance with our Code of Conduct and in line with local laws and regulations.

4.3. Accessibility and Inclusion

Within NTT we are building an accessible and inclusive environment, where every individual is respected for the value and the contribution they make to our business.

We are committed to creating an organization in which every individual is respected for who they are, has access to the tools and are part of a culture that allows them to flourish.

We also believe that the technology we use and deliver to our clients can be a powerful and essential asset, that removes barriers, to enable the improved accessibility and inclusion for people living with disabilities.

We are committed to taking actions to ensure that people with disabilities will be able to move about safely and easily at all NTT premises and make full use of our facilities, both in person and virtually.

At NTT our commitment is to:

- Create an environment where every employee is encouraged and feels safe to share details of limitations or considerations specific to their individual needs;

- Provide guidance to all employees about best practices to ensure our entire audience, either internal or external, can perform their roles equally;
- Provide an established global team to provide support and guidance for those with any type of accessibility and inclusion requirements; and
- Provide operating technology that is optimized to enable all accessibility features.

At NTT we are striving for Accessibility and Inclusion in the following areas:

- Employment practices, including the on-boarding processes;
- Physical design of our offices and data centres; and
- The technology we use both internally and with our partners and prospects.

4.4. Harassment, Bullying and Discrimination

We have a zero-tolerance policy for any form of actual or threatened violence, harassment, bullying or discrimination.

As part of our commitment to diversity, inclusion and the provision of a safe and healthy working environment, any form of actual or threatened violence against our people or anyone who is on our premises or has contact with our people in the course of their duties, is strictly prohibited and, if confirmed, will be grounds for immediate termination. Prohibited conduct includes harassing or threatening phone calls, email, social media posts or messages, written or verbal communication directed towards an employee or his or her friends or family members; stalking; and destruction of personal and/or company assets.

Harassment consists of unwelcome conduct, whether verbal, physical or visual that is based on a person's status, such as sex, gender, colour, race, ancestry, religion, national origin, age, physical or mental disability, medical condition, marital status, military or veteran status, citizenship status, sexual orientation, or any protected group.

Harassment and bullying, either verbal or physical, are also forbidden, and any behaviour of this nature will result in disciplinary action. Harassment is conduct which inappropriately or unreasonably interferes with work performance, diminishes the dignity of any person, or creates an intimidating, hostile or otherwise offensive work environment.

Examples include:

- sexual advances, requests for sexual favours, sexually explicit language, jokes, remarks about a person's body or sexual activities;
- displaying sexually suggestive pictures or objects, suggestive looks, leering or suggestive communication in any form; and
- inappropriate and/or unwelcome touching.

We also prohibit other forms of harassment, such as:

- using slurs, insults, or negative stereotyping;
- verbal kidding, teasing, or joking;
- intimidating acts, such as bullying, shouting, swearing, or threatening; and

- any other conduct that shows hostility toward, disrespect for or mistreatment of an individual.

No line manager has the authority to demand that any employee or other person co-operate with or submit to any form of harassment, or to retaliate against any person for refusing to do so.

You are strictly prohibited from engaging in harassing conduct against our clients or third parties, with whom you come into contact during or as a result of your employment with NTT. Similarly, we will not tolerate harassment of our people by any third parties.

Maintaining a welcoming and inclusive culture means that we:

- always treat others with respect;
- avoid comments or behaviours that could humiliate or intimidate others;
- avoid comments or jokes that could be considered inappropriate, offensive, or culturally insensitive;
- challenge anyone who exhibits disrespectful, hostile, or intimidating behaviour; and
- SpeakUp if we experience or witness anything that you feel is not in line with our Code on bullying, harassment, and discrimination.

4.5. Sustainability and Social Responsibility

We are committed to building a purpose led and performance driven organization. In a purpose-led organization the business objective is not only to produce profits, but profitable solutions to the problems of people and planet.

Central to our purpose is focusing our business on sustainable development in the steadfast belief that a connected future is a sustainable future. We are committed to sustainable development, whether it is using technology to make the world a better place by creating smarter cities or more effective hospitals, or building a sustainable business by developing the most energy efficient data centers in the world. We are driving sustainable business performance by enabling ethical value chains and being an equal and fair employer and a sustainable business partner. In all these areas, we are committed to making a positive impact on the world.

We endeavor to do our part with respect to global environmental issues for the benefit of all people and future generations through the Group's businesses and corporate initiatives.

In addition to our sustainability and social responsibility programs, we encourage all our people to contribute meaningfully in their personal capacity to their communities by supporting and participating in charitable programs and outreach initiatives. Together each of us can make a difference to society, the planet and business that enables a sustainable future for all.

4.6. Human Rights and Modern Slavery

4.6.1 Human rights

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect.

We respect all labour laws in every territory in which we operate and maintain stringent controls to ensure that our value chain is free from any form of forced labour and that we are never involved, either directly or indirectly, in the infringement of human rights.

We comply with the Universal Declaration of Human Rights and other international treaties and conventions which are discussed and adopted from a global perspective, as common standards that all people and countries should achieve.

All suppliers are required to agree to our position on human rights and commit to ensuring that they never make use of child or forced labour.

4.6.2 Modern slavery

We are committed to preventing any form of modern slavery within our business and our value chain and only contract with third parties who demonstrate a serious commitment to the health and safety of their people and operate in compliance with human rights laws and principles. We do not use or condone the use of slave labour or human trafficking, denounce any degrading treatment of individuals or unsafe working conditions, and support our products being free of conflict minerals.

All third parties that we engage must comply with modern slavery laws and have adequate controls in place to ensure that they are not exposed to or complicit in human trafficking and modern slavery. We work closely with our third parties on an ongoing basis to ensure that they are acting responsibly.

5. Acting with Integrity

It is critical that we always act with integrity when we are engaging our clients, third parties and other stakeholders. This is key in protecting the brand and reputation of NTT and ensuring that we conduct our business in a transparent and ethical way.

5.1. Internal Controls, Audit, Fraud and Company Assets

We maintain robust financial and accounting controls to ensure that all financial information is handled in an accurate and timely fashion. Maintaining complete, accurate, valid, and auditable records of all transactions is essential both to comply with legal requirements and to ensure that we do not mislead investors or the public about NTT's financial position.

All financial statements produced by NTT must comply with both Generally Acceptable Accounting Principles ('GAAP') and NTT's accounting policies. Any attempt to conceal or misstate financial information in company records is a serious offense and may result in disciplinary action and criminal prosecution.

We rely on our internal controls and the integrity of our people to protect company assets against damage, theft, and unauthorized use. Our values state that we must do the right thing, even when no-one is watching. We must guard against the waste and abuse of company assets, as this harms our organization and risks our reputation.

Reliable internal controls are critical for proper, complete, and accurate accounting and financial reporting. Each of us must understand the internal controls relevant to our positions and follow the policies and procedures related to those controls. If you have any concerns that a control does not adequately detect or prevent inaccuracy, waste or fraud please raise it with your line manager immediately or contact Internal Audit.

Audits performed by our internal and external auditors help to ensure compliance with established policies, procedures, and controls and to identify potential weaknesses for prompt remediation. All of us are required to cooperate fully with internal and external audits, and to provide clear and truthful information requested during the audit process.

Any attempt to mislead or defraud an individual, organization, or authority, whether of money, property or services, violates our Code, values, and the law, and carries severe penalties. These may include criminal prosecution and termination of employment.

The following are examples of activities not allowed:

- maintaining undisclosed or unrecorded funds or assets for any purpose;
- making, or asking others to make, false, misleading, or artificial entries on an expense report, time sheet or any other report;
- giving false quality or safety results;
- recording false sales or recording sales outside of the period in which they occurred;
- understating or overstating known liabilities and assets;
- delaying the entry of items that should be current expenses;
- hiding the true nature of any transaction; or
- providing inaccurate or misleading information to business benefit programs.

Every employee has a responsibility to report any actual or suspected violations of applicable accounting policies and any concerns that fraudulent activity may be taking place. These should be reported to your line manager, Internal Audit, your local Governance, Risk and Compliance or Legal team, or Group Governance, Risk and Compliance by emailing business.conduct@global.ntt. Concerns may also be raised anonymously through our SpeakUp platform:

- For our people: www.speakupfeedback.eu/web/ntt
- For our clients, third parties or other external stakeholders: www.speakupfeedback.eu/web/nttexternals

Please note that some regions may be authorized to deviate from our Code to the extent that certain provisions of our Code are shown to be inconsistent with local laws and regulations. Where a conflict arises between the requirements of our Code and local laws or regulations, legal requirements take precedence over our Code.

If you are in any doubt as to the appropriate course of action in such a situation, please consult your line manager or Group Governance, Risk and Compliance by emailing business.conduct@global.ntt

5.2. Third Party Relationships

We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behaviour and uphold our values. We rely on our third parties to help us accomplish our goals. They are part of our team and should be treated according to our values.

We offer fair opportunities for prospective third parties to compete for our business. The way we select our third parties and the character of those we select reflect the way we conduct our business.

Our procurement decisions are made on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, and price. This means that we:

- use established global or regional master services agreements;
- obtain competitive bids when global master services agreements do not exist;
- confirm the financial and legal status of the third party;
- verify the quality and service claims of the third party on a regular basis;
- ensure that agreements clearly state the services or products to be provided, the basis for earning payment and the applicable rate or fee;
- verify that invoices clearly and fairly represent goods and services provided; and
- avoid reciprocal agreements or exchange of favours.

The fee or price paid for goods and services by us must represent the value of the actual goods or services provided.

NTT will not knowingly use third parties who participate in the following activities:

- supply unsafe products or services;
- violate applicable laws or regulations;
- use child or slave labour; or

- use physical punishment to discipline employees, even if it is allowed by local laws.

5.3. Anti-Bribery and Corruption

A bribe is the offer, whether direct or indirect, of any advantage (which can include anything of value such as gifts, money, promises, meals, personal services, business or employment opportunities or other incentives) in order influence or induce action, and/or secure an improper advantage.

Bribery within a commercial setting of any kind, regardless of the location, is illegal and a severe violation of our Code which will result in disciplinary action potentially leading to dismissal, and, in some jurisdictions, criminal prosecution.

You must never offer or accept any bribe or facilitation payment (in any form, whether direct, indirect, or concealed), even if local custom encourages this. (A facilitation payment, or grease payment is an unlawful, or at least questionable, payment to foreign officials which is not considered to be bribery according to the legislation of some states as well as in international anti-bribery conventions).

All our people are required to have read, understood and comply with the [Anti-Bribery and Corruption Policy](#) ('**ABC Policy**'), which should be consulted for further information.

Due to our presence in the United States ('**US**') and United Kingdom ('**UK**'), NTT is legally bound to comply with both the UK Bribery Act (2010) and the US Foreign Corrupt Practices Act (1977). Additionally, we must ensure that we comply with any relevant anti-bribery and corruption laws and regulations within each country in which we operate. All employees with responsibilities involving transactions in any country in which we operate must be familiar with these laws.

All third parties must also adhere to our ABC Policy. Any breach of the ABC Policy will result in immediate termination of our commercial agreements with them.

If you witness any corrupt behaviour or suspect that bribery may be taking place, either within our own organization or on the part of a third party or client, you must report it immediately to your line manager, HR representative, local Governance, Risk and Compliance or Legal team, or Group Governance, Risk and Compliance. You may also report your concerns through our anonymous SpeakUp platform:

- For our people: www.speakupfeedback.eu/web/ntt
- For our clients, third parties or other external stakeholders: www.speakupfeedback.eu/web/nttexternals

5.4. Conflict of Interest

At all times, each of us must act in the best interest of NTT and exercise objective judgement in making business decisions free from any external influences. This means that we must all ensure that we are free from any actual, potential, or perceived conflicts of interest and maintain our independence in all our business decisions and relationships.

A conflict exists when your personal, social, or financial interests, duties, obligations, or activities, or those of a family member are, or may be, in conflict, incompatible with or have an impact on your obligation to exercise impartial judgement in the interest of NTT. Conflicts of interest expose our personal judgment and that of NTT to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us.

Potential conflicts of interest that must be declared in accordance with our [Conflict of Interest Policy](#) are in relation to the following:

- **Financial interests:** owning, directly or indirectly, a financial interest in any client, third party or organization that does business, seeks to do business, or competes with NTT; other than normal share dealings through a recognized stock exchange that do not exceed more than 1% of the market capitalization of the company.
- **Outside employment and other interests:** holding a second job that interferes with your ability to perform your role at NTT or with a business that competes with NTT is prohibited.
- **Board memberships:** employing, consulting, or serving on the board of a competitor, client, or third party.
- **Recruitment of family members and friends:** recruiting a family member or person with whom you have a close personal relationship with into a role that has a direct reporting relationship to you, or in the same line of authority where one employee makes decisions involving a direct benefit to the other employee.
- **Employment of family members and friends:** hiring a third party that is managed or owned by a relative or close friend.
- **Gifts and hospitality:** soliciting or accepting any cash, gifts, hospitality, or benefits that are more than modest in value from any competitor, third party, or client.
- **Incentives and commissions:** receiving any commissions, kickbacks, money, or items of value other than regular remuneration and incentives as provided in your terms of employment, either directly or indirectly, for negotiating, procuring, recommending, or aiding in any transaction entered into on behalf of NTT.
- **Corporate opportunities:** taking personal advantage of corporate opportunities resulting from your position or knowledge gained during your employment with NTT in such a manner that a conflict of interest or perception thereof could arise between the interests of NTT and your personal interests.
- **External seminars:** presenting or participating in panels in any external business seminars or conferences on behalf of NTT. External seminars is not considered a conflict of interest but requires approval.

If you believe that you may have a conflict of interest, whether actual or potential, you must protect both yourself and NTT from any suspicion of misconduct by being transparent and completing a [Declaration of Interest Form](#) promptly and truthfully, and providing details of the potential conflict of interest prior to accepting, undertaking or performing the conflicted activity.

The Declaration of Interest Form must be submitted to the Senior Vice President, Group Governance and Risk for approval. Any activities or interests relating to the potential conflict of interest may not be accepted, undertaken, or performed without prior approval from the Senior Vice President, Group Governance and Risk and, where required, the NTT Ltd. Board. Even if approved, a Declaration of Interest Form does not authorize you to engage in behaviour which conflicts with the interests of NTT.

5.5. Gifts and Hospitality

We must not give, offer, or promise a gift or hospitality of any value to a person or organization where it could reasonably be interpreted that the purpose of the gift or hospitality was to induce improper performance, to obtain or retain business, or gain an advantage in the conduct of business for NTT.

Our [Gifts and Hospitality Policy](#) describes the circumstances and conditions under which gifts or hospitality may be offered to or accepted from our clients, third parties or other organizations. It also describes the circumstances and conditions where gifts or hospitality may not be offered or must be turned down.

Gifts and hospitality may be offered and accepted in the ordinary course of business in the following circumstances:

- the gift or hospitality offered is reasonable and proportionate in amount and does not exceed the monetary cap set forth in the relevant gifts and hospitality policy;
- authorization has been obtained in writing, in accordance with the relevant gifts and hospitality policy, and the gift and hospitality offered or received has been recorded in the gifts and hospitality register; or
- gifts or hospitality offered to public officials is prohibited, unless approved in advance and in writing by the Group Senior Vice President, Governance and Risk. Public officials refer to a wide range of personnel, including executives, staff members and representatives of state-owned enterprises, government agencies, ministries and other public organizations.

Gifts and hospitality are prohibited and must be denied and/or returned in the following circumstances:

- any direct or indirect financial payment (including any incentives, irregular commissions, or kickbacks) made to you in your personal capacity;
- offering any financial gifts to clients, third parties or organizations on behalf of NTT;
- where gifts or hospitality exceed the monetary cap and have not been approved in writing, in accordance with the relevant gifts and hospitality policy;
- where gifts or hospitality offered are intended to or may be interpreted as being for the purpose of influencing the recipient to act in favour of NTT, inducing improper performance, obtaining, or retaining business, or acquiring an advantage in the conduct of business for NTT;

- where gifts, hospitality or other financial advantage is given, offered, or promised to public officials, auditors (whether internal or external) or any relatives or close friends of such officials or auditors in order to influence their duties or decisions;
- where gifts or hospitality are offered to your family members or close friends from a client, third party or organization that does business, seeks to do business, or competes with NTT; or
- where gifts, hospitality or donations of any kind are offered or made to a political party, unless prior written approval has been obtained from the NTT Ltd. Board.

5.6. Donations

5.6.1 Support for Political Organizations

Support for political organizations, support for candidates for public offices by NTT must be for appropriate purposes and be carried out with adequate transparency and in any case in compliance with applicable laws and regulations.

NTT does not, in principle, engage in political contributions related to NTT's business or other political activities, unless permitted under applicable laws and regulations, our [Anti-Bribery and Corruption Policy](#) and relevant NTT Policies and Procedures.

5.6.2 Support for Charitable Organizations

Support for charitable organizations by NTT must be for appropriate purposes and be carried out with adequate transparency and in any case in compliance with applicable laws and regulations.

We will, in the event of providing donations or support to charitable organizations related to NTT's business, conduct such activities in accordance with the steps specified in our [Anti-Bribery and Corruption Policy](#) and relevant Policies and Procedures and after conducting necessary due diligence.

5.7. Truth in Advertising, Marketing and Go-To-Market

We keep our promises to our clients and the communities in which we operate. Therefore, it is each of our responsibility to accurately represent NTT and our products, services and solutions in our marketing, advertising, and go-to-market materials. Deliberately misleading messages, omissions of important facts or false claims about our products, services, solutions, people, or competitors is inconsistent with our values and a breach of our Code.

Our marketing, advertising and go-to-market materials must be aligned to our NTT brand identity and messaging guidelines as outlined on our [brand portal](#); and sales catalogues and key go-to-market collateral on our [sales enablement portal](#).

5.8. Anti-Trust and Competition

We believe in free and open competition. In addition, in most countries where we operate, strict laws are in place that prohibit collusive or unfair business behaviour that restricts free competition.

All our people are required to have read, understood and comply with the [Competition Law Compliance Policy](#), which should be consulted for further information.

To protect our reputation we do not allow, employees under any circumstances

to enter agreements with competitors to:

- fix prices;
- establish a joint discount/rebate policy;
- rig bids;
- access competitor information including pricing in a bidding situation;
- exchange sensitive business information on prices, cost, sales or production;
- divide or allocate markets, territories, or clients; or
- boycott third parties or clients.

In addition, attempts to discriminate in price among our clients, or to otherwise restrict the freedom of our clients to compete, may be illegal.

Anti-trust or competition laws prohibit the entering into agreements, or discussing the entering into agreements, with a competitor or other third party, if the agreement restricts fair competition by any means.

We must be very careful when engaging with any employees or representatives of our competitors and must understand the rules for communicating or exchanging information with them. Agreements with competitors do not need to be written to violate applicable antitrust or competition laws. Informal, verbal, or implicit understandings (i.e., knowing winks) may also be violations.

We may not:

- discuss and/or obtain prices, discounts, go-to-market, marketing or sales strategy or policies, or client selection with/of competitors;
- make any formal or informal agreements with a competitor regarding prices, discounts, or terms of service; or
- divide clients, territories, or markets with competitors (agreeing not to compete for a client/territory/market), where the purpose or result of such discussion or agreement would potentially be collusive behaviour and/or would be inconsistent with applicable anti-trust or competition laws.

Depending on business justification and effect on competition, other practices not involving competitors may result in violations of anti-trust or competition laws. These practices include:

- exclusive dealing;
- reciprocal business arrangements;
- bundling or package offerings;
- resale restrictions; and
- selective discounting.

If you have any doubts or queries about communications with competitors or other practices in the business that may constitute anti-competitive behaviour, consult your line manager, local Governance, Risk and Compliance or Legal team or Group Governance, Risk and Compliance

The consequences of violating anti-trust or competition laws can be extremely serious for NTT and its employees, including fines for NTT, and fines and/or imprisonment for the individuals involved in anti-competitive behaviour.

If you become aware of any potential violations, contact Group Governance, Risk and Compliance or make a report on our SpeakUp platform:

- For our people: www.speakupfeedback.eu/web/ntt
- For our clients, third parties or other external stakeholders: www.speakupfeedback.eu/web/nttexternals

5.9. Competitive Intelligence and Market Analysis

Gathering information about our competitors, often called competitive intelligence, is a legitimate business practice. Doing so helps us stay competitive in the marketplace. However, we must never use any illegal or unethical means to get information about our competitors.

Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the internet.

You may also gain competitive information appropriately from clients and other third parties (unless they are prohibited from sharing the information) and by obtaining a license to use the information or purchasing the ownership of the information. When working with third parties ensure that they understand and follow our policy on gathering competitive information.

5.10. Insider Trading

During your employment with NTT, you may receive confidential company information about NTT, its clients or third parties before it is made available to the broader public. Some of that information may be considered significant, or "material", and could be important to an investor deciding to buy, sell or hold securities in NTT, its clients or third parties. Examples of information that could be material are:

- information about possible business deals, such as a merger, purchase, sale, or joint venture;
- financial results or changes in dividends;
- important management changes;
- major raw material shortages or discoveries;
- significant product or manufacturing process developments;
- gain or loss of a significant client's customer or supplier;
- major lawsuit or regulatory investigation; and
- any other information that may positively or negatively affect the stock price of NTT, its clients or third parties.

It is illegal to buy or sell securities of any company if you have material, non-public information about that company.

We may not use such information about NTT, NTT Holdings, or any companies that do business with NTT, for personal gain, nor may we pass such information on to others.

If you provide a tip based on material, non-public information which you have obtained from your employment to someone who then buys or sells securities, both of you can be convicted of insider trading.

If you are in any doubt as to whether non-public information you have is material, you should seek guidance from your line manager or your local Governance, Risk and Compliance or legal team.

5.11. Public Sector Clients and Contracting

When doing business with public sector or government entities, we must ensure all statements and representations to public sector or government procurement officials are accurate and truthful, including costs and other financial data. If your assignment directly involves the public sector or government or if you are responsible for someone working with the public sector or government on behalf of NTT, be alert to the special rules and regulations applicable to our public sector or government clients. Additional steps should be taken to understand and comply with these requirements.

Payments, gifts, hospitality, or other favours given to a public sector or government official or employee are strictly prohibited as it may appear to be a means of influence or a bribe. Engaging in any of these activities may expose the public sector or government agency, the government employee or official, our company, and you to substantial fines and penalties. For these reasons, any sale of our products, services or solutions to any public sector or government entity must be in accordance with our policies.

5.12. Anti-Money Laundering and Exclusion of Anti-Social Forces

Maintaining relationships with criminals, terrorists and other anti-social forces who threaten the social order and security through criminal acts such as violence, force, fraud, trafficking of illegal drugs, and terrorism, can undermine the trust in NTT and puts the NTT Group and ourselves at risk. Anti-social forces may also attempt to use sophisticated business transactions involving NTT to launder illegally obtained funds.

We take a firm stance against anti-social forces, refuse to accede to unreasonable demands and will never maintain a relationship with any such forces.

We all have a responsibility to protect our reputation and avoid any exposure to situations in which we could inadvertently become involved in any transactions that facilitate money laundering or unlawful diversion. Money laundering occurs when the proceeds of criminal activity are disguised by being funneled through legitimate business dealings, or when legitimately generated funds are used to finance criminal activities, including terrorism.

We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions in accordance with our [Anti-Money Laundering Policy](#). Anti-money laundering laws require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable clients and third parties involved in legitimate business activities and transactions.

This means that we must:

- never knowingly deal with any client or third party involved or suspected of involvement with criminal activity or the proceeds of crime;
- follow and perform all due diligence requirements when sourcing new third parties or engaging new clients to ensure that we only deal with legitimate and ethical companies;
- ensure that any business transactions conducted on behalf of NTT never involve acquiring or using the proceeds (monetary or property in nature) of criminal activity; and
- report any suspicions of money laundering immediately to either the Senior Vice President, Group Governance and Risk, Group Governance, Risk and Compliance by emailing business.conduct@global.ntt or through our SpeakUp platform:

- For our people: www.speakupfeedback.eu/web/ntt
- For our clients, third parties or other external stakeholders: www.speakupfeedback.eu/web/nttexternals

5.13. International Trade Compliance

As a global entity, NTT must comply with all relevant import restrictions, customs and export controls, trade sanctions and other applicable trade compliance laws and regulations. Failure to comply with these trade compliance laws and regulations can carry serious penalties including civil and criminal liability, fines, and reputational damage. It is therefore essential that we ensure that all sales and transactions are accompanied by the appropriate licenses or authorization.

To ensure that all compliance requirements are met, you should:

- never cooperate with or participate in illegal boycotts;
- actively maintain a working knowledge of the customs or export control classification for any goods, hardware, or software that you manage. This includes understanding the encryption capabilities of any software or technology that we trade;
- obtain appropriate documentation for items subject to controls, such as certificates of origin and end-user certificates;
- follow company-specific policies for trade and travelling with any company owned equipment;
- ensure that any third parties with whom we work have been screened against relevant sanctions lists;
- ensure that you are aware of any country specific sanctions and embargoes that may apply;
- comply with all record keeping requirements when transacting; and
- ensure that you know the contact details of your local or regional Trade Compliance Officer and seek their advice if you have any doubts or concerns to raise.

5.14. Government Requests and Subpoenas

We may be requested by law enforcement or other authorities to provide information regarding possible violations of applicable laws and regulations and/or support in the investigation of criminal activities. Whenever we receive requests from law enforcement or other authorities, we must immediately contact your local and regional executive teams and the Senior Vice President, Group Governance and Risk, where permitted under local laws and regulations.

Any information you provide to law enforcement or relevant authorities must be completely honest and truthful. If you receive a subpoena related to NTT or your work, immediately contact your local and regional executive teams and the Senior Vice President, Group Governance and Risk.

If you become aware of pending, imminent or contemplated litigation or a government examination or investigation, you must immediately contact your local Legal team. You must also save all records and documents that may be relevant to the subpoena, litigation, or investigation, including any records that may otherwise be automatically destroyed or erased (such as e-mail and voice mail messages).

6. Managing Information Risk

Data sits at the heart of our business and is integral to our intelligent technology solutions. Intelligent means that our solutions are data driven, connected, digital, and secure. It is critical that we embed security and privacy in everything that we do to ensure that we protect our information assets, NTT and its clients against any reputational damage resulting from unauthorized access, loss, or misuse of information assets.

6.1. Confidentiality and Information Security

During your employment with NTT, you may use or have access to information relating to NTT, its clients, or third parties, as well as applications, systems, databases, computing and mobile devices, infrastructure and network resources owned, operated, managed, hosted, or accessed by NTT (**information assets**).

We believe that any cyberattacks could impair or leak important information assets belonging to our clients or NTT, which may result in loss of credibility, as well as social disruption due to the suspension of social infrastructure systems.

We identify, protect, handle, and label our information assets in accordance with our [Asset Management and Classification Policy](#) and standards. We have identified four classes of information, including: 'Public', 'General', 'Confidential' and 'Personal Data'. Whenever you use or have access to our information assets, you must ensure that you are familiar with the applicable information classification and act to protect and handle the information in accordance with our policies and standards. Any unclassified information will be considered 'General' information and will be protected and handled accordingly.

We must all be cautious and discreet when using information categorized as 'Confidential' or 'Personal Data'. This information should be shared only with authorized individuals who have a legitimate need to know. Outside parties should only have access to this information if they are subject to binding confidentiality agreements and/or data processing agreements.

We endeavor to use information assets appropriately and implement cybersecurity in accordance with the NTT Information Security Policy in order to protect important our information assets and those belonging to our clients from cyberattacks.

6.1.1 Acceptable use

Our [Acceptable Use Policy](#) describes the proper and effective use and protection of our information assets. Each of us is expected to ensure that we understand what is considered acceptable and unacceptable use of our information assets and act in accordance with our Acceptable Use Policy at all times.

When we use our information assets, we must ensure that we:

- use information assets in an ethical, lawful, and appropriate way;
- only use authorized systems and media (including instant messengers, cloud, and portable storage) to store, process or transfer information relating to NTT, its clients, partners or third parties;

- only access and process (which includes but is not limited to copying, transfer, use of, storage) information assets for which we have authorization for an approved business requirement;
- use strong passwords and do not share these with others;
- secure our laptops and workstations when not in use;
- do not bypass any information security controls or procedures;
- comply with our information classification and handling policies and standards and maintain security classification and protection rules for handling electronic and physical information and media;
- comply with the terms of use of all software licenses;
- do not use personal services (non-business managed email accounts, cloud storage platforms, services, or devices) for information relating to NTT, its clients, partners or third parties;
- only use information assets for limited private use;
- immediately report any information security incidents;
- securely dispose of all unwanted or unrecognized physical and removeable media (including CD, DVD, USB sticks, external hard disks etc.) according to classification rules; and
- return and/ or delete all information assets to NTT when no longer required for business use.

6.1.2 Workplace surveillance

NTT may conduct surveillance and monitor individuals in the workplace (including on NTT premises, client premises, other places of work or at home) to protect against misconduct, manage productivity, and increase workplace safety. Guided by applicable jurisdictional laws and regulations, we are committed to ensuring that any workplace surveillance or monitoring is performed in a transparent, fair, ethical and lawful way and is consistent with generally accepted business practice. At all times we are committed to ensuring that we respect the dignity and privacy of individuals and do not undertake surveillance and/or monitoring activities that are unnecessary, overly invasive, or disproportionate to the intended purpose for which the surveillance or monitoring activities are performed.

NTT does not engage in blanket surveillance of individuals but reserves the right to, and in accordance with applicable law, conduct surveillance, and monitor, review and retain copies of all information assets (including communications and stored files) on a case-by-case basis, through the use of manual or automated techniques. Surveillance and monitoring of individuals may only be performed with appropriate authorization and information gathered during these activities is confidential and may only be accessed by authorized persons on a need-to-know basis.

Our [Workplace Surveillance Policy](#) describes our workplace surveillance and monitoring activities, purpose, and the circumstances under which these activities may take place.

6.2. Data Privacy and Protection

At all times NTT must ensure that it collects, uses, stores, shares, transfers, and destroys ('uses') information about individuals ('**personal data**') in a transparent, fair, ethical and lawful way. This means that we:

- are clear, open, and honest with individuals and our clients about how, why, where and when we use personal data;
- use personal data in ways that individuals and our clients would reasonably expect, where we have a legitimate business reason and do not use it in any way that would have unjustified negative effects on them;
- use personal data in a way that empowers our people, clients and communities and promotes universal values and human rights; and
- comply with the requirements of data protection laws and regulations, and other laws that may apply to us, when we use personal data.

When use personal data in a transparent, fair, ethical, and lawful way, we ensure that:

- we respect the rights of individuals to privacy and the information they entrust to us;
- we comply with data protection laws and regulations that apply to our business and avoid penalties and fines; and
- we protect the NTT brand.

The General Data Protection Regulation ('**GDPR**') is our global benchmark for data privacy and protection and must be applied throughout our business. By adopting the GDPR as our global standard, we ensure consistency in our data privacy and protection practices in all our businesses around the world. This allows us to better support and enable the connected future for our global clients who expect the same level of protection no matter where we service them from. It also helps us to ensure that we provide the same standard of care and protection to our people, no matter where they are located around the world.

Many countries in which we do business have data protection laws and regulations in place with which we are required to comply. These laws and regulations may vary in parts, but ultimately require us to ensure that we use personal data in a transparent, fair, ethical, and lawful way.

We need to be aware of the data protection laws and regulations that apply to our business to ensure that we act in a compliant way and set up our systems, applications, and processes for compliance. While we do not expect you to be an expert in all data protection laws and regulations, we do expect you to understand your local requirements and the GDPR.

Each of us must comply with our Acceptable Use Policy, Information Security Policies and Data Privacy and Protection Policies.

You can find our policies at the following links:

- [Acceptable Use Policy](#)
- [Information Security Policies](#)
- [Data Privacy and Protection Policy](#)
- [Data Subject Rights Policy](#)
- [Personal Data Breach Notification Policy](#)

6.3. Technology Ethics

We engage in a variety of research and development activities. The new technologies that are created through such research and development activities must be able to maintain the symbiosis between humans and nature. To this end, we believe that it is necessary to deepen our understanding of the characteristics of new technologies, constantly explore them, and pursue research and development activities, utilization, and implementation of

new technologies to society with high ethical standards such as respect for human rights and consideration for nature.

In particular, Artificial Intelligence (AI) will become more prevalent in society and will affect people's behaviour and decision-making. For the purpose of reducing the number of negative incidents potentially arising from AI, and realizing a human-centered society in which humans and AI truly coexist, NTT, in a position to promote research, development, operation, and utilization of AI, will promote the development activities and application of AI technology to business in accordance with applicable laws and regulations.

We will promote innovation through dialogue and collaborations with diverse stakeholders by realizing fair and trustworthy AI, while preventing potential discrimination and use of biased data and giving due consideration to privacy and security.

6.4. Intellectual Property

Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights, patents, trademarks, trade secrets, design rights, logos, expertise, industrial designs and other intangible industrial or commercial property. We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties.

Each of us is responsible for ensuring that we protect the intellectual property of NTT, our clients and third parties by:

- using the NTT brand and trademarks in compliance with our corporate guidelines;
- not knowingly infringing upon the intellectual property rights of others;
- not reproducing any copyrighted materials or trademarks such as software, music, artwork, audio, books, presentation, training materials, documentation and/or other works;
- reporting any new products, services, solutions, or other innovations to the relevant management and/or legal team;
- ensuring that all relevant product information or licenses are provided when marketing items directly to an end-user;
- ensuring that NTT's intellectual property and trademarks are protected when shared with third parties by putting in place adequate confidentiality and non-disclosure agreements, and implementing effective controls to protect NTT's commercial rights;
- never accepting any third-party confidential information without permission and appropriate agreements being in place; and
- complying with all relevant local laws on the protection of intellectual property.

6.5. External Communications

Only authorized NTT employees may speak with the media, investors and analysts on behalf of NTT, in accordance with our [External Communications Guidelines](#). Unless authorized, do not give the impression that you are speaking on behalf of NTT Ltd. in any communication that may become public. This includes posts to online forums, social media sites, blogs, chat rooms, bulletin boards and comments to the media.

6.6. Social Media

Social media is key to how we communicate as a company and as individuals. We encourage all our people to participate in social media activities in accordance with our [Social Media Policy](#).

6.6.1 Social media – business use

Only authorized employees who have completed relevant training and been approved as a spokesperson are permitted to post material on a social media website under the NTT Ltd. name. Posting without approval could lead to disciplinary procedures.

Employees are publicly representing NTT when contributing to its social media activities and the same safeguards that would be used with any other form of communication about NTT in the public sphere should be followed.

6.6.2 Social media – personal use

We respect every employee's right to a personal life and to an opinion. In fact, we celebrate diversity in opinion and thoughts if they are shared in a respectful and considered manner.

Whenever you use social media, use common sense and if you are unsure whether a post (whether professional or private) has the potential to offend or damage your or NTT's brand or reputation reach out to your line manager or marketing team. At all times we must consider how our posts may affect NTT's brand and relationships with its people, clients, and communities.

When posting content on social media we expect you to ensure that you do not:

- bring NTT into disrepute;
- breach confidentiality;
- breach copyright;
- break any applicable laws or regulations;
- bully or harass anyone; or
- publish offensive or discriminatory content or opinions.

When publishing to a professional blog or some form of social media, which is not a social media website in the NTT Ltd. name, write in the first person and make it clear that you are speaking for yourself and not on behalf of NTT Ltd.

7. Concluding Thoughts

Our Code is key to building a purpose-led and performance driven organization. It encompasses our values, our ethical standards, vision, and purpose for NTT. As a purpose-led, performance-driven organization, we begin with our purpose – ‘Together we enable the connected future’. It is at the heart, it is why we exist, it’s our reason for being.

To achieve our purpose, each of us needs to uphold our Code in all our business interactions. This means that we:

- **Know our responsibilities and SpeakUp:** by creating an honest and ethical culture that empowers our people to do the right thing and feel comfortable to SpeakUp when they see unethical conduct.
- **Build a responsible business:** by creating a purpose-led organization that is inclusive, celebrates diversity and brings together the best skills, resources, and minds to create a more sustainable, better world that helps our people, clients and communities thrive.
- **Act with integrity:** by holding ourselves and others accountable and doing the right thing even when no one is watching.
- **Manage information risk:** by enabling a secure and connected future by using “technology for good” and embedding security and privacy in everything we do.

Our legal and ethical obligations extend beyond the explicit requirements included in our Code.

We must comply with both the letter and the spirit of the many laws and regulations that affect the way we do business, but we must go beyond merely complying with minimum requirements to ensure that our actions fully reflect our values and ethical standards.

There will almost certainly be times when the best course of action can be decided only by ensuring that our behaviour is consistent with our values and ethics.

Doing so will help us to deliver a secure and connected future that empowers our people, clients and communities.

TOGETHER WE DO GREAT THINGS