

# Code of Conduct Policy

Version 2

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## 1. General

### 1.1 Purpose

This NTT DATA Business Solution AG Code of Conduct describes the mission statement regarding our group-wide, uniform understanding of our values, our conduct in the business environment and our fellow employees in the company.

**Note:** *Where employee statements are addressed to employees, they apply not only to dealings between managers and their employees but also to dealings between employees.*

### 1.2 Scope of Application

The scope of this Code of Conduct covers NTT DATA Business Solutions AG, divisions operating under it and all affiliated companies of NTT DATA Business Solutions AG in which the Amount of Holding of NTT DATA Business Solutions AG, directly or indirectly, is at least 90%. Excluded from the scope of application is BIL Leasing GmbH & Co. ITYS KG, which is managed by NTT DATA Business Solutions AG VC-Holding GmbH.

## 2. Welcome Statement

Dear Reader,

We owe our corporate success and our continuous growth to the great individual achievements of each and every employee. Long-term corporate success requires a group-wide, uniform understanding of our values, our conduct in the business environment.

To ensure a common understanding, this Code of Conduct describes our mission statement in this regard. In particular, the personal responsibility and integrity as well as the legally compliant and ethically correct conduct of each of us play a decisive role. Our main concern in this context is to ensure the sustainable success of our Company for the future by conducting our business in accordance with current business, legal and ethical practices and by complying with all applicable local and international laws, regulations, and Company guidelines.

This Code of Conduct describes our principles, standards, and values, which we have already acted upon in the past and in accordance with how we must act in all business areas in the future. The Code of Conduct applies equally to the Board, executives, management, and every individual employee. It represents an obligation for us and at the same time a promise to the outside world, to our business partners, government institutions, authorities, and competitors. Unwanted behavior by a person not only harms those directly affected but also jeopardizes NTT DATA Business Solutions AG good reputation as a company.

We have a responsibility to uphold the reputation of our Company, and only together – through the integrity of each individual –we can achieve this. The Code of Conduct is intended to help minimize or avoid risks and conflicts in day-to-day work and business transactions. Clear identification with our values, protects us from harm and secures a successful joint future for all of us.

All employees are therefore required to read the Code of Conduct carefully and to take in its values, standards, and principles. All employees are encouraged to report violations of this Code of Conduct by using available channels not limited to our Whistleblowing program if necessary.

The Management Board of NTT DATA Business Solutions AG

Norbert Rotter

Jürgen Pürzer

### 3. Our Values



#### **Clients First**

We strive to be an ethical and trustworthy partner in every aspect of business relationships. Through our Reputational Risk Management program, we protect our integrity and keep our clients safe.

#### **Teamwork**

We work together under known expectations through clear, defined policies; we encourage involvement and take pride in results achieved through team efforts. We provide global insight to skills of our employees making sure we deliver the best team possible for every task.

#### **Foresight**

We build our strategies with focus on future demands. We identify potential business impacts and opportunities and build resilience with the capability for an effective response.

**We are NTT DATA Business Solutions AG**

## 4. Conduct in the Business Environment

### **Conduct in compliance with the law**

In order to protect our Company and its reputation and to avert liability risks, we always act in accordance with laws and regulations. We respect applicable laws, regulations, business practices, prohibitions, embargos, and other requirements even if this results in contracts being rejected, leading to a short-term economic disadvantage. We place long-term sustainable corporate success above short-term economic advantages.

### **Benefits and Corrupt Behavior**

We do not make or accept any payments, gifts, invitations, donations, or other benefits in violation with our policies or any local or international law, to or from any person, entity, association, or government institution, in order to obtain or grant any contract or benefit. All forms of corruption, bribery and corruptibility pose a particular threat to the reputation of a company and are therefore not tolerated by NTT DATA Business Solutions AG. We never want to be involved in any way in bribery of government officials or employees and representatives of public authorities. We will actively ensure that we will not be part of anti-money laundering, terrorist financing or other illegal financial transactions.

### **Conflict of Interest**

We avoid or prevent situations in which we may be exposed to a conflict of interest or accused of misconduct by refraining from participating in, conducting, or influencing a transaction in which a business partner or representative of the tax authority is related to the employee directly involved in the transaction.

### **Fair Taxation**

The NTT DATA Business Solutions AG complies with tax-related laws and regulations. We established basic guidelines on tax affairs in view of the growing importance of adopting a global perspective on properly addressing and managing tax risks. We aim to maintain and improve compliance in the field of taxation.

### **Information Handling**

We are committed to honesty, credibility and integrity and therefore attach great importance on providing up-to-date, complete, and truthful reporting and communication on the Company's operations. This applies to and towards our executives, employees, customers, sales partners, suppliers, investors and/or government institutions. At the same time, we prevent unauthorized access to confidential information and business documents by unauthorized third parties. Customer information is carefully managed in accordance with agreements, relevant laws, and regulations to protect confidentiality and personal data. We do not publish confidential or copyrighted information or news in social media that violate the trust or rights of any party.

## Data Ethics

We will not engage in development or make use technologies that undermines political elections, freedom rights, democratic institutions, or public governance. When developing and using technologies, such as Artificial Intelligence, that may result in an unintended bias, we will ensure a fair, reliable and explainable approach. We will contribute to the development of society with healthy and harmonious dissemination of new technologies by improving literacy of users and by service designs, which are universal design compliant.

## Data Protection and Information Security

The protection of personal data, particularly that of employees and all business partners, is of special significance to us. We take all necessary precautions to ensure that information security is maintained and to prevent the occurrence of data protection violations, unauthorized access, or other illegal actions with this data. We only collect and/or process personal data if this is necessary or legally required to fulfil the respective operation or agreement. Personal data may not be collected or processed without the consent of the data subject or without other legal legitimacy.

## Dealing with Suppliers and Business Partners

We act with integrity, without abusing any superior position. We comply with laws and regulations applicable to transactions with Suppliers and Business Partners. For Suppliers we ensure the integrity imposing our binding Supplier Code of Conduct through our supply chain.

## Dealing with Competitors

We limit ourselves to those actions, so that we do not act in a way that hinders competition including not engaging in actions such as defamation, dumping, cartel formation and other unfair/anti-competitive conduct. We protect our own intellectual property and respect the intellectual property of others.

## Avoiding Conflicts of Interest

Conflicts of interest due to private concerns or other motives are always avoided in the business environment. Business decisions are made exclusively in the interest of the Company. Where conflicts of interest arise, they are transparently disclosed, communicated and appropriate measures are taken. We do not engage in any form of insider trading.

## Our Environmental Footprint

We support and prefer IT systems and solutions that help reduce environmental impact. We strive to reduce the environmental impact of our operations. We are raising our awareness of biodiversity and engage in activities to protect the natural environment. We comply with the environmental laws and regulations for our services.

## **No Tolerance towards Infringements**

Intentional irregular behaviour by an employee which jeopardizes a risk to the reputation of the Company or causes noticeable disadvantages to the Company will not be tolerated and will be sanctioned accordingly. In order to protect our employees from unintentional misconduct, we provide guidelines that show employees how to behave in accordance with the rules and carry out appropriate training measures. Our compliance management system as well as our other control functions ensure compliance with the rules.

## **5. Behaviour in the Company**

### **Dealing with Shareholders**

We operate a solid corporate governance and represent the interests of our owner. We pursue a timely and appropriate disclosure policy of management information to ensure transparent corporate governance.

### **Occupational and Health Safety**

Our employees are our most important assets. The safety, health and the well-being of each individual employee is our top priority. For this reason, occupational safety and health protection are an integral part of all operational processes and are included in technical, economic, and social considerations.

### **Equal Opportunities and Development Opportunities**

We respect the individuality and personality of each employee. Offering our employees equal opportunities and showing perspectives results in satisfaction, motivation, and commitment. A culture of mutual trust and respect is very important to us. As an international company, we are committed to a personnel policy that is free from discrimination and harassment of any kind. This begins in the employee hiring process and applies to promotions and approval of training and further education. We treat all employees equal, regardless of gender, age, race colour, culture, ethnic origin, sexual identity, disability, religion, or belief. Sexual harassment will not be tolerated.

### **Human and Labor Rights**

We support compliance with internationally recognised human rights, including the Universal Declaration of Human Rights, which is reflected in the International Labour Organisation's eight core conventions. We recognise the right of employees to form trade unions and employee representation on a democratic basis within the framework of their respective national regulations. Remuneration and other benefits are at least in line with the respective national and local legal standards. We maintain fair and equal treatment of employees and provide employment opportunities based on individual merit in a safe working environment, free from discrimination, violence, or child labour. With awareness of our responsibilities, we show respect for human



rights by trying to avoid negative impacts on people and rights holders, and we react quickly, appropriately and considered when negative impacts on human rights occur. We expect such behaviour from our business partners, too.

### **Protection of Company Property**

We protect the tangible and intangible property of our Company against loss, theft, or misuse. The intellectual property and trademark rights of our Company are of special importance, which we defend against any unauthorized access or use by unauthorized persons. We do not use company property for personal purposes unless explicitly permitted. All employees are responsible for ensuring that the nature and extent of business trips are always commensurate with the purpose of the business trip.

### **Open Dialogue**

A trusting relationship with and among our employees is an important aspect of a positive corporate culture. We support open dialogue shaped by our values, which are supported by all employees.

## **6. Implementation of the Code of Conduct**

The Code of Conduct sets the framework for the actions of the Executive Board, managers, supervisors, and all employees of the Company. It sets the standard for responsible action in the interest of sustainable corporate success, for actions within the Company and in business dealings with our business partners, customers, government institutions and associations.

The Executive Board, managers and all supervisors actively promote the communication of the requirements resulting from the Code of Conduct. Further specific rules are contained in the guidelines, process descriptions, contracts, agreements, and other instructions of NTT DATA Business Solutions AG and of all branches and subsidiaries. These apply directly to and are binding for all employees.

Any violation of the requirements of the Code of Conduct may jeopardize the Company's reputation, sustainable success and thus the continued existence of the Company as an employer for a large number of employees. For this reason, all employees are requested to be proactive in ensuring that the Code of Conduct and rules derived therefrom is not violated.

In the event of questions regarding the understanding of the provisions of the Code of Conduct for employees, managers are available as the first point of contact due to their special responsibility. In addition, further questions can be directed to the respective compliance officers. Information on possible violations of laws or serious infringements of guidelines can be reported confidentially via our internal or external whistleblowing

options. The corresponding contact details can be accessed via the intranet. It is NTT DATA Business Solutions AG promise not to take any disadvantageous measures against those who have reported in good faith as a whistleblower.

In the event of questions regarding the understanding of the provisions of the Code of Conduct for interested parties, please contact us through the contact options on our webpage: [www.nttdata-solutions.com](http://www.nttdata-solutions.com)