



Policy Statement

to protect human rights
and the environment



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1. General

1.1. Our commitment

As a global company, NTT DATA Business Solutions AG and its affiliated companies (hereinafter “NTT DATA” or “we”) believe that our business activities should have a positive impact on society and therefore strive to create a safe and prosperous work environment. NTT DATA is committed to upholding the UN Guiding Principles on Business and Human Rights and the German Act of Corporate Due Diligence Obligations in Supply Chains.

We respect human rights in the context of our business activities and environmental protection. We build trusting relationship and cooperation with our stakeholders in order to better understand the perspective of those affected by our business activities and to respond appropriately. In a rare event that our business activities have a negative impact on human rights and the environment resulting from a violation of any applicable laws, we will take prompt and appropriate measures to remedy the violation in the quickest manner possible and take measures to prevent future violations. Our membership in the UN Global Compact and the Business for Social Responsibility Human Rights Working Group demonstrates our commitment to this goal.

1.2. Purpose of Policy Statement

The purpose of this policy statement is to articulate and publicize our commitment to respecting human rights and the environment through clearly defined due diligence activities to promote understanding and, where appropriate, implementation by relevant stakeholders.

1.3. Scope of application

This policy statement is applicable to various parties. The parties covered by the scope may fall into one of the following categories, among others:

- all NTT DATA employees;
- Employees of other companies who are assigned to NTT DATA's business activities, regardless of whether they work in one of NTT DATA's offices or elsewhere;
- Business partners, such as contractors, vendors, suppliers or agencies (and their employees),
- who provide goods or services to NTT DATA;
- NTT DATA customers; and
- all other persons associated with NTT DATA.



2. Due diligence procedure

2.1. Risk management

At NTT DATA, responsibility for managing the protection of human rights and the environment lies with the compliance and sustainability teams, who work closely with the procurement and human resources departments.

The Chief Compliance Officer, who also acts as NTT DATA's Human Rights Officer, holds monthly meetings with the Chief Financial Officer to report on relevant activities and challenges in the areas of human rights and environmental protection.

The Legal, Risk and Compliance department is responsible for developing strategic concepts, planning appropriate measures and working closely with the relevant specialist departments to implement human rights-related initiatives and manage the whistleblowing system. The sustainability team is also dedicated to strategic development, the planning of measures and interdisciplinary cooperation to ensure the sustainable protection of human rights and the environment.

Our internal audit department regularly assesses group companies to ensure that human rights and environmental initiatives are being implemented as planned and to identify any additional issues that may arise.

2.2. Risk analysis

2.2.1. Risk analysis process

The risk analysis in our group company was designed on the basis of the information and materials available on the website of the German Federal Office of Economics and Export Control. These are the FAQs and the handouts.

2.2.1.1. Our own business division and existing suppliers

Our risk analysis consists of three steps, both for our own business area and for existing suppliers.



1. Abstract risk analysis

We map our company locations worldwide as well as our active suppliers. We then analyze them according to the criteria of country and industry-specific risks.



2. Concrete risk analysis – part 1

In addition to the first step, we include further criteria in our analysis: Type and scope of business activity, probability of occurrence, severity of the breach (by degree, number of people affected and irreversibility), scope for influence and the company's contribution to causing the breach. Based on these criteria, we classify our sites and suppliers into the categories of low, medium and high risk.

For existing suppliers, we also take into account the risks associated with indirect suppliers.



3. Concrete risk analysis below

a. Own business area: We have created a questionnaire that covers a wide range of human rights and environmental issues as well as operational issues of strategic relevance. This is sent to all our locations in order to obtain information about the situation on site and identify existing measures to avoid potential risks.

b. Existing suppliers: All suppliers with a high risk and some with a medium risk from the first part of the risk analysis receive our supplier-related questionnaire.

This risk analysis process is carried out regularly, at least once a year, and on an ad hoc basis as required.

2.2.1.2 New suppliers

All new suppliers are checked for their human rights and environmental practices before commencing business activities. We use a compliance management tool for this purpose. In addition, suppliers with a high environmental and human rights risk receive a questionnaire that reviews their actual risks.

2.2.2. Result of the risk analysis

- a. Own business division: Our current risk analysis has shown that disregard for health and safety in the workplace and unequal treatment at workplace are the key risks that we need to be aware of. No specific risks requiring immediate action were identified. We continue to work on improving our risk management in our offices as well as in our data centers.
- b. Supply chain: Based on our current risk analysis, we have not identified any imminent risks among our direct suppliers. However, some of them have room for improvement in terms of their general risk management practices.

In contrast, our indirect suppliers continue to be exposed to a certain degree of risk, as the lower levels of their supply chains are exposed to a broader range of risks, some of which could pose an immediate threat.

2.3. Preventive measures

We plan our preventive measures mainly on the basis of the results of the risk analysis, the complaints submitted via our whistleblowing system and the results of the internal audit. We also take information from our external partners into account. We are a member of the United Nations Global Compact and Business for Social Responsibility. We regularly participate in organized meetings where we receive the latest information on due diligence activities. Our aim is to continuously optimize our preventive measures.

2.3.1. Existing measures

Several measures are already in place.

a. Own operations		
GUIDELINES	TRAINING	ACTIVITIES (e.g.)
<ul style="list-style-type: none">• Code of Conduct• Human Rights Policy• Safe workplace- Anti-sexual Harassment Policy• Code of Conduct for Suppliers	<ul style="list-style-type: none">• Accompanying training is offered for the above guidelines, which all employees must complete (with the exception of the Code of Conduct for Suppliers)• Training on safety in the workplace• First aid training	<ul style="list-style-type: none">• World Health Day• World Mental Health Day• World Bicycle Day• Soccer Club• Active breaks• Yoga sessions• Mindfulness training• Fire drills• Offer of medical examinations

b. Supply chain		
GUIDELINES	COMMUNICATION	PROCESSES
<ul style="list-style-type: none">• Code of Conduct for Suppliers	<ul style="list-style-type: none">• Media alerts	<ul style="list-style-type: none">• Global compliance due diligence process

2.4. Remedial measures

If we learn of and confirm potential or actual violations of human rights and the environment, we will take appropriate remedial action to stop or minimize these violations. Indications of violations will be investigated immediately and the necessary authorities will be involved.

Violations in own operations

In our own business operations, the remedial measures should lead to the resolution of a violation and proper sanctioning of a violation, depending on the individual case. We communicate with all parties involved and endeavour to find the best solution for those affected.

Violations at direct suppliers

In the event of violations at direct suppliers, the responsible purchasing managers work together with the suppliers. Possible measures may include drawing up a corrective action plan with a timeframe, monitoring its implementation and/or suspending the contractual relationship with the supplier. If no improvement is found in the case of violations by direct suppliers, we reserve the right to terminate the business relationship as a last resort.

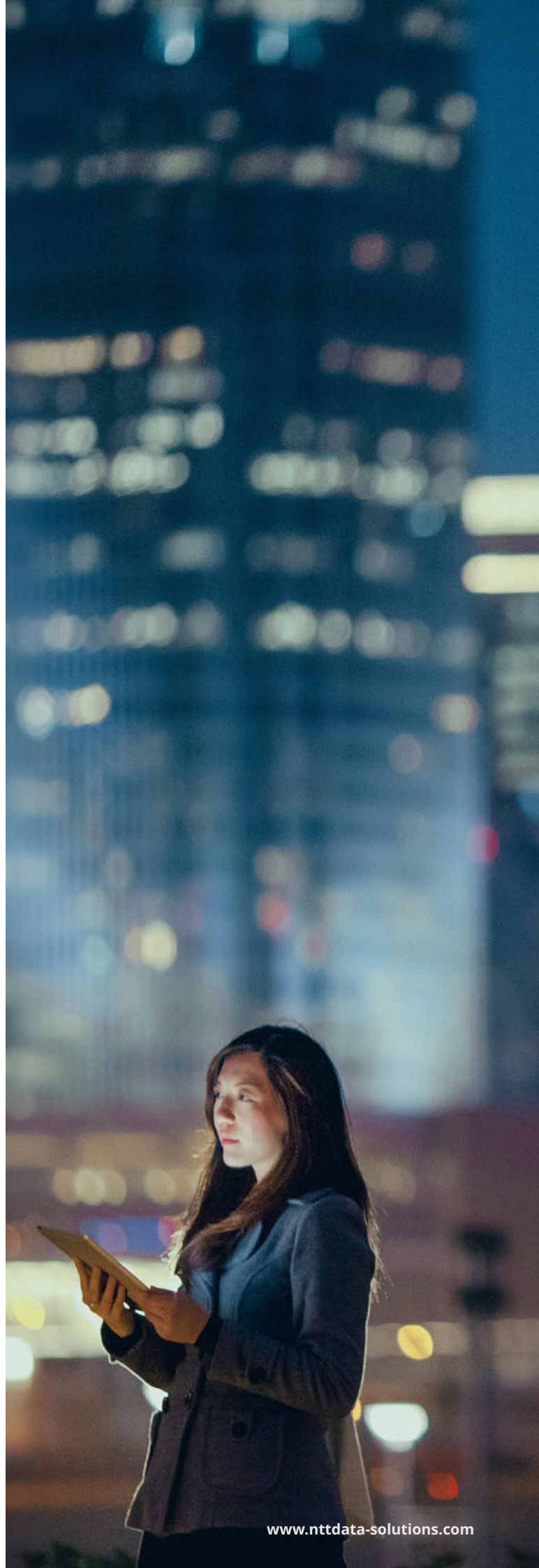
Violations by indirect suppliers

In the case of indirect suppliers, we develop and implement a plan to prevent or minimize violations. In addition, we strive to work together with other companies or organizations to jointly implement the plan. If no improvement is found in the case of violations at indirect suppliers, we reserve the right to terminate the business relationship as a last resort.

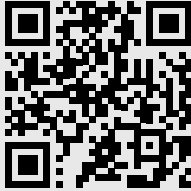
2.5. Complaints procedure

We have set up a complaints management system and corresponding whistleblowing offices with the aim of being informed about any violations, complaints or related concerns and having the opportunity to investigate them. We guarantee the confidential treatment of all reports, which - provided no legal regulations are violated or the person submitting the report consents to being named - remain anonymous. Honest and well-intentioned reports are subject to protection for the reporter from disciplinary action and retaliation, even if the allegations are unfounded.

Our [rules of procedure for the whistleblower system](#) explain in simplified language how our complaints procedure works.



2.5.1. Our reporting channels

Complaints channels	For whom	Contact information	Description
SpeakUp	Everyone	ntt.speakup.report/NTT 	<ul style="list-style-type: none"> • Available in different languages • Managed by the Risk and Compliance department of NTT DATA Inc.
Global NTT DATA Ethics Helpline	Everyone	E-Mail: Ethicshelpline-solutions-de@bs.nttdata.com	<ul style="list-style-type: none"> • Managed by Global Legal, Risk & Compliance
Local reporting channels	Internal	<ul style="list-style-type: none"> • Your supervisor • <u>Regional or local compliance managers</u> (see contact persons under "Reporting Contacts") • Global Legal, Risk & Compliance Team • Human Rights Officer / Chief Compliance Officer 	<ul style="list-style-type: none"> • Contact us directly by phone, e-mail or in person

2.6. Documentation and reporting obligations

The fulfilment of due diligence obligations to protect human rights and the environment is continuously documented by NTT DATA. An annual report on the fulfilment of due diligence obligations is prepared and made available on our [website](#).

2.7. Continuous review

NTT DATA will critically review compliance with and effectiveness of the due diligence obligations on a regular basis and make further adjustments if necessary.

3. Approval

The Management Board of NTT DATA Business Solutions AG, represented by Chief Executive Officer Nobert Rotter and Chief Financial Officer Nicola Czymek-Lauer, approved this declaration of principles by signing it.

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Nobert Rotter
Chief Executive Officer

DocuSigned by:

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Nicola Czymek-Lauer
Chief Financial Officer

Learn more about NTT DATA Business Solutions

www.nttdata-solutions.com

We Transform. SAP® Solutions into Value We understand the business of our clients and know what it takes to transform it into the future. At NTT DATA Business Solutions, we drive innovation – from advisory and implementation to managed services and beyond. With SAP at our core and a powerful ecosystem of partners, we continuously improve solutions and technology to make them work for companies – and for their people.

