

# Rules of procedure for the whistleblowing system



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## 1. Introduction

Since January 1, 2023, NTT DATA Business Solutions AG (NDBS) has been obliged to implement the provisions of the Act on Corporate Due Diligence Obligations in Supply Chains (SCA). NTT DATA Business Solutions has therefore supplemented the existing whistleblowing system with regards to the requirements of the SCA. These rules of procedure are a supplementary document to the NDBS Whistleblowing Policy.

## 2. What is the purpose of the whistleblowing system?

The whistleblowing system is intended to fulfill two purposes:

1. It serves as an early warning system through which problems are reported as a complaint, recognized and ideally solved before they escalate or become significant.
2. It provides access to appropriate remedies when needed.

## 3. To which NDBS companies do these Rules of Procedure apply?

These Rules of Procedure apply to (NDBS) and all domestic and foreign companies in which NDBS directly or indirectly holds more than 50 percent of the shares or in which it has management responsibility.

## 4. Who can report complaints?

The complaints procedure applies to all parties, regardless of whether the complaint is made within the company or within the supply chain, at home or abroad. All parties have a responsibility to report any potential grievance to the whistleblowing system. The persons concerned may fall into one of the following categories, among others:

- All NDBS employees including external workers
- Employees including external workers at direct or indirect suppliers
- Employees including external workers at NDBS customers
- Individuals who reside near NDBS offices or place of performance
- External stakeholders such as non-governmental organizations (NGOs), trade unions, etc.
- Any other persons associated with NDBS



## 5. What can be reported?

Suspected and possible violations of laws or internal regulations, including those already announced in the NDBS Whistleblowing Policy, such as corruption or financial irregularities, can be reported. Violations of human rights and environmental obligations can also be reported. Below is a list of possible items to report; however, these are not exhaustive:

- Child labor
- Forced labor and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of association, the rights to organize and the right to collective bargaining
- Unequal treatment in employment
- Withholding of an appropriate wage
- Environmental damage due to soil, water and air pollution as well as noise pollution and excessive water consumption
- Unlawful forced evictions and unlawful deprivation of land, forests and waters

- Commissioning or use of private / public security forces that can lead to impairments due to lack of instruction or control
- Violation of a prohibition from the Minamata Convention on Mercury
- Import and export of hazardous waste within the meaning of the Basel Convention
- Production and / or use of substances within the scope of the Stockholm Convention on Persistent Organic Pollutions (POPs) and non-environmentally sound handling of waste containing POPs

## 6. Who is responsible for reports for complaints?

The Global Legal, Risk & Compliance department is centrally responsible for the operations of the complaint's procedure for NDBS and is the internal reporting office. All employees entrusted with handling the complaints procedure are trained impartial specialists who are not bound by instructions due to their work in this area and are subject to a special duty of confidentiality.

They report directly to the Chief Compliance Officer, who is also the Human Rights Officer and has a direct reporting line to the NDBS Executive Board.

To contact the Global Legal, Risk & Compliance department, an e-mail can be sent to the following address.

The identity of the whistleblower will be protected in all cases to the extent permitted by law.

### **NTT DATA Business Solutions AG**

Königsbreede 1  
33605 Bielefeld

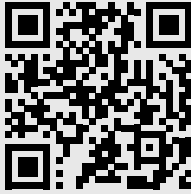
Global Legal, Risk & Compliance  
department: [Ethicshelpline-solutions-de@bs.nttdata.com](mailto:Ethicshelpline-solutions-de@bs.nttdata.com)

Local and regional reporting contacts are available to our employees via [SharePoint](#).



## 7. Are there different complaint channels for submitting complaints?

Yes, there are various reporting channels at NDBS for reporting complaints. These channels can be used free of charge by anyone potentially involved.

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

## 8. What information should complaints contain?

The whistleblower should provide as much information as possible, for example:

- Type of incident (chronological)
- Evidence or witnesses
- Description of relevant documents
- Time frame (time, place, company name)

## 9. How does the complaints procedure work?

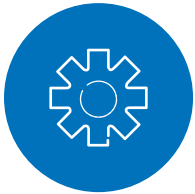


### Receipt of the complaint

The complaint will be received and documented by the respective responsible person who received the report.

A whistleblower who discloses his or her identity (known whistleblower) will be contacted by the person responsible as soon as possible, but at the latest within two weeks of receiving the report. In some cases, the investigation may require the report to be forwarded to an internal or external investigator for assistance.

If the whistleblower submits the report anonymously, NDBS will not be able to contact the whistleblower for further information or follow-up discussions. The whistleblower who reports anonymously has no right to receive further information in relation to their report.



### Determination

The complaint is reviewed immediately, appropriately and legally to determine whether there may be a breach of duty within the meaning of the SCA or a breach of other laws or internal policies ("initial suspicion") and the further procedure and responsibilities are determined. In the event of a rejection, the known whistleblower is provided with a statement of reasons.

All complaints are handled fairly and transparently. During the investigation, the person responsible has the opportunity to interview alleged witnesses and/or the whistleblower and gather all necessary information.

Depending on the nature and severity of the suspected offence, NDBS may or may not be required to refer the matter to a supervisory authority or law enforcement agency.

The Chief Compliance Officer (CCO) may choose to involve the NDBS Ethics Committee to form an independent opinion on the approach under the circumstances and the results found during the investigation.

The whistleblower can obtain information on the status of the procedure at any time (the whistleblower can contact the respective contact person at any time e.g., by e-mail or phone or directly to the respective contact person)



### Remedial measures

At the end of the investigation, the CCO or the respective responsible Compliance Manager submits a confidential report to the Board of Directors or top management of the respective country, which ultimately decides on the measures to be taken.

Every complaint will be discussed with a known whistleblower accordingly. The known whistleblower receives a proposal for remedial action. The known whistleblower will be informed on the follow-up measures no later than three months after receipt of the notification.

The **NDBS Ethics Committee**, appointed by the Board of Directors on the recommendation of the Chief Compliance Officer, consists of five to seven employees. It provides ethically sound opinions and suggestions. The committee is composed of different departments and locations to ensure diversity. There must be a balance between managers and non-managers. The Ethics Committee acts when requested by the Board of Directors or the Chief Compliance Officer and provides an independent assessment and opinions. The term of office is two years, unless otherwise specified.



## 10. How am I protected as a whistleblower?

NDBS ensures that all reports made to the CCO, or the respective compliance contact persons are treated with the utmost confidentiality. As long as the confidentiality of the report does not constitute a violation of applicable laws – and NDBS is therefore not obliged to involve the country's law enforcement authorities – the identity of all whistleblowers remains anonymous.

All complaints made honestly and with the best intentions are free from any consequences and disadvantages for the whistleblower. A whistleblower and anyone who assists him or her in making a report are protected from disciplinary action, even if the allegations prove to be unfounded. All reports made under these Rules of Procedure therefore protect whistleblowers from any form of retaliation.

### Learn more about NTT DATA Business Solutions

[www.nttdata-solutions.com](http://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.

