

NTT DATA North America Global Code of Ethics – North America Addendum

28 – October 2026

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1 Introduction to the Global Code of Business Ethics – North America Addendum

At NTT DATA North America[1], our commitment to ethical conduct is guided by the NTT DATA Group Code of Business Ethics, which sets the foundation for integrity, respect, and accountability across all regions in which we operate. This North America Code of Business Ethics Addendum serves as a regional extension of the Global Code, reinforcing its principles while addressing the specific expectations, regulatory requirements, and business requirements relevant to North America operations. Any references in other NTT DATA North America policies, agreements, letters or other documents to the "Code of Business Conduct" shall encompass the NTT DATA Group Code of Business Ethics, this Addendum, and any other NTT DATA policies on the topics discussed in the Code of Business Ethics or this Addendum.

This Addendum is designed to support and uphold the values outlined in the NTT DATA Group Code of Business Ethics by providing clear guidance to employees and management in North America on how to apply these principles in their daily work. It emphasizes our shared responsibility to act with integrity, comply with local laws and industry standards, and foster a workplace culture that reflects our global ethical commitments.

All employees and leaders in North America are expected to:

- Understand and adhere to both the Global Code of Business Ethics and this regional Addendum.
- Exercise sound judgment and seek guidance when faced with ethical dilemmas.
- Promote a culture of transparency, respect, and accountability.
- Report concerns or potential violations without fear of retaliation.

By aligning our regional practices with our global values, we strengthen our reputation, build trust with our stakeholders, and contribute to a responsible and sustainable business environment.

1.1 NTT DATA Group Code of Business Ethics

NTT DATA Group Corporation (Global Headquarters of NTT DATA Group) has its own Code of Business Ethics which describes standards and values for NTT DATA Group companies, which includes North America employees, contractors and business partners. The North America Code of Business Ethics Adendum outlines additional compliance and ethics obligations of North America employees, contractors and business parnters.

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[1] For purposes of this Addendum, "NTT DATA North America" or the "Company" means NTT Data International L.L.C., NTT DATA Services International Holdings B.V. and their respective subsidiaries. It also includes NTT DATA (China) Co. Limited, Dalian Branch, NTT DATA (Thailand) Co., Ltd., and PT NTT DATA Indonesia, to the extent related to NTT DATA North America. It also includes the following direct or indirect subsidiaries of NTT Limited: NTT America, Inc., NTT America Cloud Solutions Inc., Nexus IS, Inc., NTT Canada, Inc., Millennium Process Group, Inc., and Millennium1 Solutions Philippines Inc., each of which to the extent related to NTT DATA North America.

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Please review the entire NTT DATA Group Code of Business Ethics, which can be found here:

NTT DATA Code of Business Ethics

Our Addendum is designed to be complementary to the NTT DATA Group Code, If you have any questions about the applicability of the Code or this Addendum, contact the Compliance Team.

1.2 Policy Statement Concerning the Global Code of Business Ethics

It is the Company's policy to conduct its affairs in accordance with the highest moral and ethical principles and to comply with all applicable laws and regulations. This Addendum sets forth legal and ethical standards of conduct for officers and employees (collectively referred to as "Employees") of the Company. Although it is the purpose of the Addendum to present a clear statement of what is expected of all Employees, the Addendum cannot address all possible situations of concern that may arise. The Company has a number of other policies and procedures in place, though, that attempt to fill any gaps.

Employees are expected to be aware of this Addendum and the Company's policies and procedures and to act in accordance with them at all times. Employees are expected to use good judgment and common sense in conducting business on behalf of NTT DATA, and to seek advice and assistance if they are uncertain how best to align to NTT DATA policies and values. This Addendum applies to the Company and all of its subsidiaries and other business entities controlled by it worldwide.

1.3 Responsibilities

The Company has the duty to communicate to all Employees the standards of ethics and conduct set forth in the NTT DATA Group Code of Business Ethics and this Addendum and to enforce these standards at all levels.

Every Employee of the Company has the duty to read, understand, and comply with the NTT DATA Group Code of Business Ethics "the Code" and this North America Addendum "Addendum". Any Employee who has questions about, or suspects violations of, the Code, the Addendum or any other NTT DATA policy must follow the Reporting Concerns as outlined in Section 2.1.

The Company requires that all Employees, directors, contractors and agents comply with all laws, rules and regulations applicable to the Company wherever it does business. If anyone becomes aware of the violation of any law, rule or regulation by the Company, whether by its directors, officers, Employees, or any third-party doing business with or on behalf of the Company, it is the Employees' responsibility to promptly report the matter to their leader, to the Compliance Team, our confidential whistleblowing avenues, or if necessary to a Division Leader.

While it is the Company's desire to address matters internally, nothing in this Addendum discourage anyone from reporting any illegal activity, including any violation of the securities laws, anti-bribery and corruption laws, antitrust laws, and environmental laws or any other federal, state or foreign law, rule or regulation, to the appropriate regulatory authority. Employees and directors shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an Employee because the Employee in good faith

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reports any such violation. This Addendum should not be construed to prohibit Employees from testifying, participating or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

Leaders of the Company have the duty to make certain that all Employees under their supervision are advised of the current provisions of the Code and this Addendum are periodically reminded of the importance of adhering to the principles set forth therein, and to create and maintain an environment where each Employee feels responsible for and comfortable with complying with the Code and this Addendum and reporting actual or suspected violations, without fear of retribution or retaliation.

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2 Our Work Environment

2.1 Reporting Concerns

Anyone having knowledge of, or questions or concerns about, an actual or possible violation of the provisions of the Code and this Addendum must immediately report the matter to their leader or via one of the options below.

- Online via the anonymous and confidential SpeakUp channel: SpeakUp
- Over the phone by dialing your country specific number outlined here: Global Phone Numbers
- The Compliance Team: Compliance.Team@nttdata.com
- The Employee Relations CoE, via the Employee Service Center
- The HR Business Partner assigned to your team
- Internal Audit

Remember, if an Employee does not feel comfortable talking to their leader about a known or suspected violation of NTT DATA policy or the law, for instance because their leader already knows of or has approved the conduct in question, the Employee nevertheless needs to report such matter through one of the above alternative avenues. Similarly, if an Employee is not comfortable with the response they received or the action taken by their leader, they need to elevate such issue by one of the above alternative avenues.

NTT DATA strictly prohibits discrimination or retaliation in any form against Employees for making good faith reports of their concerns.

2.2 Equal Opportunity

The Company is dedicated to the fair and equal treatment of its Employees and to providing employment opportunities on the basis of individual merit, consistent with local laws. To that end, the Company condemns and will not tolerate discrimination against its Employees or applicants on the basis of race, color, national origin, religion, sex, sexual orientation, disability, age, genetic information, ancestry, marital status, veteran status, creed, citizenship status, gender identity or expression or other basis protected by applicable law, including, without limitation, United States federal, state and local laws. The Company's nondiscrimination policy applies to recruitment, hiring, training, compensation, benefits, promotion, demotion, transfer, termination and all other terms, conditions and privileges of employment.

Additionally, and consistent with applicable law, the Company will make reasonable accommodation for qualified individuals with disabilities unless doing so would result in an undue hardship to the Company. An applicant or Employee who requires an accommodation in order to perform the essential functions of the job should contact their management team or a Human Resources representative, or utilize the Employee Service Center, in order to request such an accommodation.

Any Employee who has any questions, issues, or suggestions concerning this policy should contact their leader, the Compliance Team, or Human Resources via Employee Service Center (ESC) ticket.

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For further information see NTT DATA Group Code of Business Ethics 2.6 “Creating an equal and discrimination-free workplace”

2.3 Security Obligations

All Employees have a right to work in an environment that is safe, secure, and free of violence. Employees have an obligation to work with the Company to achieve this goal by supporting access control practices, escorting visitors, and reporting unauthorized or suspicious activity and persons to their management or to the Facilities Manager if at a corporate office. Certain customers and subsidiaries of the Company have more detailed security policies and procedures, which Employees are obligated to understand and follow when performing work for such customers and subsidiaries.

2.4 Policy Against Harassment

The Company is committed to providing a productive and professional work environment. Accordingly, harassment of Employees occurring in the workplace or other work-related settings that is based on race, color, national origin, religion, sex, sexual orientation, disability, age, genetic information, ancestry, marital status, veteran status, creed, citizenship status, gender identity or expression or other basis protected by federal, state, local, or other applicable laws, will not be tolerated by the Company. Similarly, sexual harassment occurring in the workplace or other work-related settings will not be tolerated by the Company. Each Employee is responsible for treating other Employees with dignity and respect and ensuring that their personal conduct and comments in the workplace support a professional environment that is free from unlawful harassment.

Any incident of harassment should be reported to the Employee’s leader, Employee Service Center (ESC), an HR Business Partner, the Compliance Team, or by calling the Company’s Ethics Hotline. Leaders who receive complaints or who observe harassing conduct should immediately inform Human Resources.

Complaints of harassment or other unlawful behavior are serious matters. The Company expects Employees to report such behavior and leaders to promptly act upon such allegations. If an investigation confirms improper conduct, the Company will take appropriate action. It is a violation of the Code and this Addendum to retaliate against any Employee for filing a good faith complaint of harassment or for cooperating in good faith in an investigation of such a complaint.

Employees should also familiarize themselves with any local Company Policy Against Harassment specific to their country or location.

For further information see NTT DATA Group Code of Business Ethics 2.4 “Rejecting All Forms of Harassment”

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2.5 Drugs and Alcohol

It is the intent of the Company to maintain a workplace that is free of illegal drugs and alcohol and to discourage drug and alcohol abuse by its Employees. The Company specifically prohibits the following acts while in the workplace or on Company business:

- The unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or dispensing of alcohol, illegal drugs, or other controlled substances;
- The purchase, sale, manufacture, distribution, transportation, or dispensing of any legal prescription drug in a manner inconsistent with law;
- Being under the influence of drugs that are illegal under any law that applies to the individual;
- Being under the influence of alcohol while working. In certain limited instances, such as at Company sponsored events or during a business-related dinner, moderate use of alcohol may be permitted, but in all such instances proper business decorum must be maintained; or
- Working while impaired by the use of a legal drug whenever such impairment might endanger the safety of the Employee or some other person, pose a risk of significant damage to Company property, or substantially interfere with the Employee's job performance.
- In certain instances, such as when working in a safety-sensitive position, Employees and/or applicants may be requested to take a drug test, to the extent permitted by applicable law. In addition, Employees and applicants may be required to submit to drug and alcohol testing, to the extent permitted by applicable law, before being permitted to work on certain customers' projects, or at the customers' request.

All Employees should familiarize themselves with the Company's Drug-Free Workplace Policy. Among other requirements, if an Employee is convicted of violating a drug statute while on Company property or business, and that Employee is assigned to work under a government contract, that Employee must report this fact to their leader within five days of the conviction.

For further information see NTT DATA Group Code of Business Ethics 2.3 "Maintaining Workplace Safety"

2.6 Global Health & Safety

It is the Company's policy to conduct its business in a manner compliant with applicable health and safety laws and regulations. The Company is committed to continuous efforts to identify and eliminate or manage safety risks associated with our activities. For additional information pertaining to health and safety matters, please see the NTT DATA Group Code of Business Ethics, Section 2.3 and the **NTT DATA North America Health and Safety Policy** which further addresses this important issue.which further addresses this important issue.which further addresses this important issue.

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3 Conflicts of Interest

3.1 Activities Outside the Company

Generally, the Company has no interest in preventing Employees from engaging in lawful activities outside of work. However, Employees must make sure their outside activities do not conflict or interfere with their responsibilities to the Company. A conflict of interest occurs or may occur when a personal interest interferes, or potentially interferes, with the interests of the Company, or otherwise has or could have an impact on an Employee's obligation to exercise impartial judgment in the interests of the Company. The personal interest need not be financial to create a conflict of interest. For purposes of considering conflicts of interest, the term "Family Member" includes immediate family members, including individuals related by marriage, or members of the Employee's household.

All actual or potential conflicts must be disclosed promptly, truthfully, and accurately.

If an Employee has a question about a potential conflict of interest, the Employee should discuss it with their leader or the Compliance Team. Directors and certain other employees of the Company must follow approval requirements spelled in Section 3.7.

Employees should exercise caution before deciding to serve on the Board of Directors of a for-profit company, or any Advisory Board of any for-profit enterprise, and an Employee must receive written approval to do so from the Compliance Team to do so. Officers and Directors of the Company must follow the approval requirements outlined in Section 3.4.

For further information see NTT DATA Group Code of Business Ethics 3.6. "Avoiding Conflicts of Interest" and the Conflict of Interest policy and any other applicable NTT DATA compliance policy

3.2 Community and Charitable Activities

The Company encourages all Employees to be actively involved in their communities through volunteer service to charitable, civic, and public service organizations and through participation in the political process.

Employees must make sure, however, that their service and that any charitable contributions are consistent with their employment with the Company and does not pose an actual or perceived conflict of interest. This is particularly important before accepting any leadership position (such as membership on the board of a charitable or civic organization) and before seeking or accepting political office.

If Employees have any questions about whether a charitable activity or contribution creates an actual or potential conflict of interest, they should submit a request to the Compliance Team.

For further information see NTT DATA Group Code of Business Ethics 4.4 "Contributing to a Sustainable Environment and Society" and any other applicable NTT DATA compliance policy

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3.3 Questions About and Reporting Conflicts of Interest

It is the Employee's responsibility to disclose any transaction or relationship that reasonably could be expected to rise to an actual or perceived conflict of interest to the Compliance Team. Employees, as determined by management, must certify that they do not have any conflicts, or have obtained the necessary approvals for certain relationships, in the annual certification process required by the Company's Conflict of Interest policy.

3.4 Additional Requirements for Executives Officers, and members of the Company's Board of Directors

An officer of the Company, an Employee with the position of vice president or above, or director of the Company (together, "Certifying Employees") shall not assume or maintain a financial interest in or relationship with another person or entity that constitutes a conflict of interest. A conflict of interest exists if Certifying Employee or their spouse has an interest in, or relationship with, any person, firm or corporation that is a supplier, customer, or competitor of the Company. For purposes of this section:

Any financial interest should not cause divided loyalty or speculation about why the Certifying Employee has the interest. Specific factors which should be evaluated are:

- Position within the Company;
- Relationship of the investment amount to the Certifying Employee's financial needs;
- When and where the investment was made; and
- The nature and extent of the relationship.

A conflict of interest is ownership, directly or indirectly, of an interest in any corporation, partnership or other business which:

- Conducts activities in competition with the Company;
- Sells supplies, services or other materials to the Company;
- Purchases the Company's products and/or services;
- Acts as an agent or jobber for the Company;
- Sells or leases real estate to the Company; or
- Otherwise represents the Company in dealings with others.

A conflict of interest also exists if a Certifying Employee:

- Holds any position as an officer, partner or director in any such corporation, partnership, or organization;
- Violates the Company's policy concerning offering or accepting gifts and gratuities;
- Is in a Personal Relationship with a direct report or is in a Personal Relationship with an Employee within the Certifying Employee's line of authority;
- Uses Company knowledge or information for personal gain; or
- Is involved in an activity for personal gain which for any reason conflicts with the Company's business interests or interferes with the Employee's ability to perform their job.

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Based on the foregoing examples, any business relationship by Certifying Employees which may be reasonably construed to be in violation of this policy should be reported to the Compliance Team and the Chief Financial Officer.

Furthermore, an officer (other than the CEO) must receive prior approval from the Board of Directors, the CEO, or the Compliance Team before accepting a position as a director, officer or Advisory Board member with another company, whether or not it is a supplier or competitor, for profit or non-profit, while serving as an officer of the Company. The CEO must receive prior approval from the Board of Directors before accepting any such position.

This section is not intended to preclude ownership by Certifying Employees or members of their immediate family of stock in publicly owned corporations, provided such ownership does not present substantial influence on the activities of the corporations which do business with or are in competition with the Company. This section is also not intended to preclude Certifying Employees or members of their immediate family from having a direct or indirect financial interest in or relationship with any person, firm or corporation, provided such interest does not present substantial influence on the activities of the persons, firms or corporations which do business with or are in competition with the Company. However, all such interests must be reported annually in the form referenced below.

At least annually, each Certifying Employee within the scope of this policy as designated above, shall present an executed “Conflicts of Interest Certificate” to the Chief Financial Officer or Controller, the results of which shall be summarized and presented to the Board of Directors.

For further information see NTT DATA Group Code of Business Ethics 3.6. “Avoiding Conflicts of Interest” and any other applicable NTT DATA compliance policy

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4 Technology Use, Privacy and AI

The Company provides various Technology Resources (defined below) to authorized Employees to assist them in performing their job duties for the Company. Each Employee has the responsibility to use the Company's Technology Resources in a manner that increases productivity, enhances the Company's public image, and is respectful of other Employees.. Failure to follow Company policies and procedures regarding Technology Resources may lead to limitation or removal of access to these Resources, as well as disciplinary measures, up to and including termination of employment.

For further information see NTT DATA Group Code of Business Ethics 4.2 "Responsible Use and Safeguarding of Our Assets"

4.1 Authorization

Access to the Company's Technology Resources is within the sole discretion of the Company. Generally, Employees are given access to the Company's various Technology Resources consistent with their job functions. The Company reserves the right to limit such access by any means available to it, including revoking access altogether.

4.2 Use of Technology Resources

The Company's Technology Resources are to be used by Employees only for the purpose of conducting Company business. Employees may, however, make use of the Company's Technology Resources for the following incidental personal use so long as such use is reasonable, does not interfere with the Employee's duties, is not done for monetary gain, does not conflict with the Company's business, and does not violate any Company policy or procedure or any applicable law or regulation:

- To send and receive occasional personal communications, including using the telephone system to make occasional brief personal calls;
- To prepare and store incidental personal data (such as personal calendars, personal address lists, and similar incidental personal data) in a reasonable manner; and
- To access the Internet for brief personal searches and inquiries during mealtimes or other breaks or outside of work hours, provided that Employees adhere to all other Technology Resource usage policies.

Any incidental use must not impede or overload the performance of any of the Company's or its customers' Technology Resources.

The Company assumes no liability for loss, damage, destruction, alteration, disclosure, or misuse of any personal data or communications transmitted over or stored on the Company's Technology Resources. The Company accepts no responsibility or liability for the loss or non-delivery of any personal electronicmail or voicemail communications or any personal data stored on any Company Technology Resources or property. The Company discourages Employees from storing important personal data on the Company's Technology Resources.

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4.3 Use of AI in the Workplace

Employees may use AI (including generative AI, machine learning, and AI agents) for Company business only through Company-approved tools and for approved purposes. Employees must comply with NTT DATA AI governance policies and applicable approval processes. New AI technologies, newly enabled AI capabilities, and business use cases involving AI must be submitted through the Global New Technology Approval Process (GNTAP) before use, as required by Company policy.

- Use only Company-approved AI tools, accounts, and data sources. Do not use public, personal, or other unapproved AI tools for Company work.
- Protect Company, client, Employee, and third-party information. Do not enter Confidential Information, Personal Information, Personal Health Information, client data, or protected intellectual property into an AI tool unless the use is authorized and the tool is approved for the data involved.
- Employees remain responsible for work performed with AI. Apply appropriate human review before relying on, sharing, or acting on AI-generated content, and do not assume AI output is accurate, complete, unbiased, or appropriate.
- Do not use AI to make or materially influence employment or other significant decisions about individuals unless the use case is specifically approved, complies with applicable law, and includes required human oversight and Legal, Data Privacy, Information Security, and AI governance review.
- Promptly report suspected AI-related security or privacy incidents, harmful or unexpected behavior, policy violations, or material changes to an approved AI use case through the applicable Company reporting channels.

For further information see NTT DATA AI Governance, Risk and Compliance resources and the Global New Technology Approval Process (GNTAP).

4.4 Information Security and Data Privacy

The Company has an Information Security and Data Privacy Policies applicable to all Employees, which prescribes how Personal Information and Personal Health Information of Company Employees and clients should be protected and handled (as defined in NTT DATA Information Security and Data Privacy Policies). It is the Company's policy to treat Personal Information and Personal Health Information of Company Employees and clients as confidential. Such Personal Information and Personal Health Information should be accessed only by those Company Employees authorized to do so in the course of their employment, and transmitted and disposed of in accordance with NTT DATA Information Security and Data Privacy Policies

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For further information see NTT DATA Group Code of Business Ethics 4.2 “Responsible Use and Safeguarding of Our Assets”

4.5 No Expectation of Privacy; Company Right of Access to Technology Resources

As a general rule, and to the fullest extent permitted by applicable law, Employees should understand that they have no right of privacy with respect to any messages or information created, maintained, or sent on the Company’s Technology Resources, including personal information or messages. The Company reserves all rights, to the fullest extent permitted by law, to inspect the Company’s facilities, property, records and systems, including without limitation all messages sent and received and all data and information stored on the Company’s Technology Resources, including the Company’s e-mail system, voicemail system, and computer systems, regardless of the content. The best way to guarantee the privacy of personal information is to not store or transmit it on the Company’s Technology Resources.

Consistent with applicable law, the Company may routinely monitor or examine Employee use of its Technology Resources. The Company further reserves, to the fullest extent allowed by law, the right to access, retrieve, review, intercept, read and disclose any information stored or made available on any of its Technology Resources, including Employee and Company computer files, electronic mail, voicemail, and usage information, at any time, at the Company’s sole discretion. The Company also reserves to the fullest extent allowed by law the right to monitor its Technology Resources at any time in order to determine compliance with its policies, for purposes of legal proceedings, to investigate misconduct, to locate information, or for any other business purpose.

4.6 Prohibition Against Harassing, Discriminatory, Threatening, and Defamatory Use of Email

Electronic communication is generally a less formal method of communication than written memoranda. Employees must therefore take care to avoid permitting informality to deteriorate into improper use.

Under no circumstances may an Employee use the Company’s Technology Resources to transmit, request and receive, or store any information that is discriminatory, harassing, threatening, indecent, or defamatory in any way, or that, in any way, violates the Company’s policy against discrimination or harassment.

4.7 Prohibition Against Violating Copyright Laws

Employees may not use the Company’s Technology Resources to copy, retrieve, forward, or sendcopyrighted materials unless the Employee has the author’s permission or is accessing a single copy only for the Employee’s reference. The downloading of software, tools, or other copyright protected material from the Internet without prior, written approval from the Company’s Chief Information Officer or the Chief Information Officer’s designee is prohibited. Impermissibly downloading material in violation of applicable copyright laws may lead to disciplinary measures, up to and including termination of employment. The Company reserves

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its rights to hold the Employee personally accountable for any resulting liability or damage to the extent permitted by applicable law.

For further information see NTT DATA Group Code of Business Ethics 3.9. "Protecting Intellectual Property"

4.8 Other Prohibited Uses

Employees may not use any of the Company's Technology Resources for any illegal purpose, in violation of any Company policy, in a manner contrary to the best interests of the Company, in any way that discloses Confidential Information of the Company or third parties (as defined in Section 4.11 below), in a manner that creates security risks (such as downloading or using software or hardware whose primary purpose is testing or exploiting Technology Resources), or for personal or monetary gain.

4.9 The Internet and Online Services

The Company provides authorized Employees access to online services such as the Internet. As noted earlier, the Company expects that Employees will use these services in a responsible way and for primarily business-related purposes. Unless expressly permitted by applicable law, Employees are at all times prohibited from using the Company's Technology Resources to access, download, or contribute to the following:

- Gross, indecent, or sexually oriented materials;
- Illegal drug-oriented sites;
- Gambling and game sites;
- Malicious or potentially harmful content, code, or applications; or
- Job-search sites (other than in connection with Company business).

4.10 Use of Social Networking and Personal Websites

In general, the Company respects the rights of its Employees to use social media for personal use (e.g., Twitter, Facebook, LinkedIn, Instagram, WhatsApp, YouTube, TikTok, Snapchat, personal websites, blogs, wikis, etc.) (together, "Social Media") as well as their rights to develop websites, micro-sites or landing pages for personal use (collectively "Personal Websites"). However, all Employees are expected to observe the following guidelines when creating, posting, commenting, communicating, participating, sharing, or engaging in any form of conduct with respect to Social Media or Personal Websites, whether using the Company's Technology Resources or not:

- Follow Company policy. All Employees should adhere to the Code, this Addendum, and other applicable Company policies, procedures, agreements and applicable law and regulations.
- Employees are responsible for their Personal on-line content. Employees are personally responsible for the content they publish on-line via Social Media or on Personal Websites. Employees may not post content on Social Media or Personal Websites that is vulgar, obscene, hateful, discriminatory, threatening, intimidating, or knowingly or recklessly false.

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- Protect the Confidential Information of the Company and of Company clients. Employees may not use Social Media or Personal Websites to disclose Confidential Information (which includes client information disclosed to the Company, as defined in Section 4.11).
- Respect copyright, fair use and financial disclosure laws. An Employee may not use Company logos or trademarks or reference any of the Company's current, former, or prospective clients, teaming partners, or suppliers, in a way which suggests that the Employee is representing the Company or while engaging in Social Media activity that is unlawful or violates Company policy. Employees may not make postings that include confidential or copyrighted information (in whatever format) belonging to third parties.
- Only Authorized Company Representatives may speak for the Company. Unless specifically instructed otherwise, an Employee is not authorized to speak, write, or post on behalf of the Company, even to correct misinformation.
    - If an industry analyst contacts an Employee, please refer the analyst or analyst firm representative to the Analyst Relations team at dl-analystrelations@nttdata.com.
    - If a member of the news media or blogger contacts an Employee about a Social Media statement that concerns the business of NTT DATA, please refer that person to Corporate Communications & Public Relations, at public.relations@nttdata.com.
    - If an Employee makes a statement concerning or related to the Company's business on Social Media, that Employee must clearly identify themselves as an NTT DATA North America Employee, and include a disclaimer that the views expressed are those of the Employee and not those of the Company (e.g., "the statements made on this blog are mine and do not necessarily reflect the views of NTT DATA"). Leaders in the Company have an additional responsibility when using Social Media and/or non-Company websites, as, even with a disclaimer, personal statements posted on the internet may be misunderstood as expressing NTT DATA's position. Employees should not knowingly or recklessly make false statements on Social Media or Personal Websites about the Company, including the Company's directors, officers, Employees, clients, products, services, business relationships, and finances.
    - Only Authorized Company Representatives may create websites for the Company. Unless specifically instructed to do so in the course of employment and on behalf of the Company, an Employee is not authorized to create a website or other on-line content for the Company.
    - Do not let Social Media use impact job responsibilities. Employees should make sure that use of Social Media does not interfere with performing their job responsibilities.
    - Use common sense and good judgment when using Social Media. Common sense is the best guide if an Employee decides to post information on Social Media. If an Employee is unsure about whether posting a particular statement will be in accordance with this section of the Addendum, the Employee should contact Human Resources via Employee Service Center (ESC) or the Communications & PR department for guidance.

This section of the Addendum is intended for the protection of the Company, its clients, and its Employees. The Company respects an individual's right to self-expression and opinion. This section of the Addendum will not be construed, applied, or interpreted in any way so as to infringe upon the rights of Employees to self-organize, form, join, or assist labor organizations,

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or to bargain collectively. Nothing in this section of the Addendum is intended to prohibit Employees from communicating in good faith about wages, hours, or other terms and conditions of their or their co-worker's employment. Employees will not be disciplined or retaliated against for exercising their rights protected under the U.S. National Labor Relations Act or other similar laws. However, violations of Company policies or actions that otherwise damage the Company's business may result in disciplinary action, up to and including termination.

For further information see NTT DATA Group Code of Business Ethics "3.7. Communicating Responsibly"

4.11 Software Use License Restrictions

All software in use on the Company's Technology Resources is officially licensed software. No software is to be installed or used that has not been duly paid for and licensed appropriately for its intended use. No Employee may load any software on the Company's computers, by any means of transmission, unless authorized in advance by the Executive Head of IT North America. Authorization for loading software onto the Company's computers will not be given until the software has been thoroughly tested for compatibility with installed or accessed Company business systems and software is scanned for viruses. Unauthorized downloading of software for use in violation of the applicable license (e.g., using a software with a private license for commercial use) may lead to disciplinary measures, up to and including termination of employment. Employees should familiarize themselves with the applicable Enterprise Architecture Governance procedures.

4.12 Confidential Information

The Company is very sensitive to the protection of trade secrets and other confidential and proprietary information of both the Company and third parties, including suppliers and customers (together "Confidential Information"). Employees are expected to use good judgment and to adhere to the highest ethical and legal standards when using or transmitting Confidential Information, whether on the Company's, a customer's, or another party's Technology Resources.

Examples of Confidential Information includes, but is not limited to, non-public information, (whether written or oral) pertaining to: trade secrets; methodologies; presentations, marketing and sales plans and forecasts, discoveries, ideas and know-how; business and strategic plans; pricing information and rate structures; merger and acquisition activity; financial plans and forecasts; plans for new service offerings and products; customer lists; customer proposals; phone lists, organization charts and e-mail lists; and the personal information or personal health information (as defined by the Company's Information Security Policies or applicable law) of Company Employees, suppliers and customers.

Unauthorized copying, use, disclosure or circulation of Confidential Information is strictly prohibited. Confidential Information may only be used within the ordinary course of employment with the Company. Confidential Information should not be accessed through the Company's Technology Resources in the presence of unauthorized individuals. Similarly,

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Confidential Information should not be left visible or unattended. Employees should use caution when sending Confidential Information over the Internet. Employees also should verify electronic mail addresses or facsimile numbers before transmitting any messages or Confidential Information.

Any Confidential Information transmitted via the Company's Technology Resources should be marked with a confidentiality legend. Any Confidential Information that constitutes personal information or personal health information (as defined by the Company's Information Security and Data Privacy Policies or applicable law) of Employees or third parties must be handled, stored, transmitted, and destroyed in accordance with applicable law and the Company's Information Security and Data Privacy Policies.

Nothing in this Code prevents a US-based non-management, non-supervisory employee from engaging in protected concerted activity under §7 of the National Labor Relations Act or similar state law such as joining, assisting, or forming a union, bargaining, picketing, striking, or participating in other activity for mutual aid or protection, or refuse to do so; this includes using or disclosing information acquired through lawful means regarding wages, hours, benefits, or other terms and conditions of employment, unless the information was entrusted to the employee in confidence by the Company as part of the employee's job duties.

For further information see NTT DATA Group Code of Business Ethics "3.8. Safeguarding Confidential Information"

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5 Gifts, Gratuities, Entertainment, and Other Considerations

5.1 Gifts

Except as set out below, Employees should refrain from giving and receiving business-related gifts. Any exceptions to this guideline must be approved in writing by the Compliance Team.

Any gifts or hospitality offered or received in violation of this policy should be reported immediately to the Compliance Team or through any of the other reporting channels set forth in this Addendum

5.1.1 Receiving Gifts.

No Employee may solicit any business-related gift, or accept any gift or gifts worth more than $250 over the course of a calendar year, from a person or organization seeking to have or who has a business relationship with the Company, or has interests that could be substantially affected by actions of the Company.

Additional approvals may be required for offering or receiving certain gift-related expenses based on the type or amount of expense. If an Employee is uncertain if additional approvals are required, the Employee should confirm with the Compliance Team.

5.1.2 Giving Gifts.

No Employee may give, offer or promise a business-related gift or gifts worth more than $250 over the course of a calendar year to any person or organization on behalf of the Company.

Additional approvals may be required for offering or receiving certain gift-related expenses based on the type or amount of expense. If an Employee is uncertain if additional approvals are required, the Employee should confirm with the Compliance Team.

Note that the rules on this topic relating to U.S. and foreign government personnel are stricter. See Section 5.3 below.

No Employee may give, offer or promise a gift of any value to any person or organization where it could reasonably be interpreted that the purpose of the gift was to induce improper performance or to obtain or retain business, or an advantage in the conduct of business, for the Company.

No Employee should accept a customer, vendor, or supplier discount for themselves unless it is made available to all Company Employees or otherwise approved by the Compliance Team.

Invitations to participate in so-called “directed shares,” “friends and family,” and similar stock purchase programs of customers, vendors, or suppliers of the Company are considered to be gifts. Employees should decline to participate in such programs unless they have sought and received written approval to participate from the appropriate Division Leader and the Compliance Team. Such approval may be granted where the offer to participate was made to the Employee irrespective of any past, present, or future connection with the Company and without the actual or apparent intent to influence the Employee’s objective business judgment.

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For further information see NTT DATA Group Code of Business Ethics "3.1. Standing Against Bribery and Corruption" and any other applicable NTT DATA compliance or expense policy

5.2 Business-Related Meals, Entertainment, and Travel

Employees may provide or accept business meals, entertainment, lodging, and travel, including attendance at sporting or cultural events, as long as it: (1) is associated with an occasion at which business is discussed; (2) is professionally appropriate; and (3) and is provided as a normal part of business, and could not reasonably be interpreted as being for the purpose of inducing performance or obtaining or retaining business, or an advantage in the conduct of business, for the Company.

The value of the activity must be reasonable and permissible under the Company's expense account procedures, regardless of whether or not the Company is paying for the activity. Except for attendance at Company Corporate-sponsored hospitality events, Employees must obtain prior, written approval from their leader before accepting or offering business-related lodging, travel, or attendance at sporting, cultural, or other business entertainment events the value of which exceeds $400. Additional approvals may be required for offering or receiving certain hospitality-related expenses based on the type or amount of expense. If an Employee is uncertain if additional approvals are required, the Employee should confirm with their the Compliance Team. All expenses and expense reimbursements must also comply with the applicable Travel and Expense Policy.

For further information see NTT DATA Group Code of Business Ethics "3.1. Standing Against Bribery and Corruption" the NTT DATA Inc Global Traval & Expense Policy and any other applicable NTT DATA compliance or expense policy

5.3 Gifts and Entertainment Rules with Respect to Government Officials and Employees

The laws and rules concerning doing business with governments and their officials and employees are complex and very restrictive. Many countries have laws that significantly limit or prohibit the ability of government officials or employees to give or accept gifts or business entertainment or meals.

With this in mind, Employees may not give or offer to give to any government employees or officials who are prohibited from accepting such consideration any entertainment, meal, travel, gift, or other item of value. Employees who are unsure if a government employee or official is prohibited by applicable law, rule or regulation from accepting such consideration must receive advance written approval from the Compliance Team before offering any entertainment, meal, travel, gift or other item of value to the government employee or official.

If government employees or officials are present at conferences or meetings at which the Company is providing refreshments or a light meal, a contribution basket should be placed conspicuously next to the refreshments so that the government employees and officials may contribute an appropriate amount for the cost of any refreshments or meals they consume.

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For a further explanation of guidelines applicable to doing business with the government, see section 8.1, entitled “Government Contracting”in this Addendum.

For further information see NTT DATA Group Code of Business Ethics “3.1. Standing Against Bribery and Corruption” and any other applicable NTT DATA compliance or expense policy

5.4 Bribes and Kickbacks

Paying, or offering to pay, a bribe or a kickback to anyone, for any reason, by any means, is strictly prohibited. Likewise, Employees may not solicit, agree to receive or accept a kickback or bribe, in any form, for any reason.

This is not limited to cash or other monetary payments. It includes any financial or other advantage. A “financial or other advantage” includes, but is not limited to, money, favors, entertainment, or gifts.

The Company has Anti-Bribery and Corruption polcies applicable to all Employees, which prescribes the Company’s commitment to ethical and lawful conduct.

For further information see NTT DATA Group Code of Business Ethics “3.1. Standing Against Bribery and Corruption” and any other applicable NTT DATA compliance policy

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6 Business Relationships

6.1 Customer Relationships

The Company's customers are of the utmost importance to the Company. Employees should always treat customers and potential customers ethically and according to the highest standards of business conduct.

It is the Company's policy to always sell its products and services on their merits and to avoid making disparaging comments about the products and services of competitors. Employees should refrain from commenting upon the character, financial condition, or potential legal or regulatory problems of competitors. Employees should follow the following guidelines in selling the Company's products and services:

- Sell on the strength of the Company and its services and products, not on the weaknesses of its competitors.
- Do not make claims about the Company's products or services unless the claims are both factual and complete and can be fully substantiated.
- Do not make claims about a competitor's products or services unless the claims are based on the competitor's current published materials or other factual data approved for selling purposes by the Company.
- If a customer or potential customer has a contract with a competitor or has placed a firm order with a competitor, do not suggest or imply in any way that the customer revoke, rescind or breach that contract or order.

6.2 Business Analysts

Only assigned Company spokespeople may engage with or provide information to industry analysts.

- The Analyst Relations team must be informed of all interactions with analysts and included on all written communication with any analyst firm.
- Analyst Relations oversees all contracts with analyst firms, regardless of how the contract is funded. No Company employee may enter a contract with an industry analyst firm without approval from Analyst Relations.
- For additional information, please review the NTT DATA Analyst Relations Policy.

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6.3 Privacy of Customer Communications

The Company's customers trust us with one of their most important assets — information. We must honor this trust by protecting the privacy of customer communications, whether the communication is in electronic, voice, written, or other form.

The Company has established the following guidelines to protect privacy of customer communications:

- Do not eavesdrop on, record, or divulge the contents of any customer conversation, electronic message, document, or other transmission. Never let anyone else do so.
- Do not divulge to any other individual, except an authorized Employee requiring the information for a legitimate business reason, any information about the customer's (or their customers') communications, identity, or other business information or records.
- Do not use any customer information from any non-public source for personal benefit or that of anyone else.
- Do not access customer records or information in any system, for any reason, except for official Company business.

6.4 Selecting Suppliers

The Company's suppliers and companies and individuals that sell products and services to the Company are vital to our business. Employees should always treat suppliers and potential suppliers ethically and in accordance with the highest standards of business conduct.

Suppliers should be selected on the basis of objective criteria, such as value (quality for price), price, technical excellence, service reputation, and production/service capacity with Procurement involvement and in alignment with applicable Procurement Policies. Employees should never say, sign or write anything that a supplier or potential supplier may reasonably interpret as a commitment to do business unless expressly authorized to do so.

Suppliers must adhere to the applicable Supplier Code of Business Ethics and Supplier Standards.

For further information see NTT DATA Group Code of Business Ethics "3.3. Maintaining an Ethical and Sustainable Supply Chain" and any other applicable NTT DATA compliance policy

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6.5 Working with Existing Suppliers

Employees should comply with the following rules when working with existing suppliers, which includes NTT Group companies that are not within the NTT DATA Group family:

- Never interfere with a supplier's contracts or business relations with a competitor of the Company.
- Never reveal Confidential Information about one supplier to another supplier or to anyone outside of the Company. This includes confidential or non-public information about services or products supplied, pricing, service level assurances, purchase volumes, and other terms and conditions.
- Follow the Company's guidelines concerning gifts, gratuities, entertainment, and other considerations of value. Section 5 of this Addendum, entitled "Gifts, Gratuities, Entertainment, and Other Considerations", discusses this subject in greater detail.
- Avoid any interest that conflicts with, or appears to conflict with, their or another Employee's responsibility to the Company. Section 3 of this Code, entitled "Conflicts of Interest", discusses this subject in greater detail.
- Reject any agreement with a supplier that restrains, or may appear to restrain, competition. Such agreements violate Company policy and may violate the law. Employees with procurement responsibilities should review the sections of this Addendum concerning government contracting and antitrust and should be familiar with applicable laws. If an Employee is unsure whether a proposed agreement violates this guideline, contact the Compliance Team.

For further information see NTT DATA Group Code of Business Ethics "3.4. Competing Fairly" and any other applicable NTT DATA compliance policy

6.6 Sales Agents, Representatives, Distributors, and Consultants

Agreements with sales representatives, agents, marketing consultants, distributors, and other parties require adherence to Company policies and applicable U.S. and foreign government laws and regulations. The Company requires appropriate management approval (including, but not limited to, appropriate contract and signature approval policies) and review by the Corporate Legal Department prior to entering into any such agreements.

Any third-party economic incentives, including but not limited to sales incentives and commission structures, offered to the Company or by the Company to resellers, sales agents, or intermediaries, must be disclosed and pre-approved in the deal review process, or in accordance with the Company's applicable policies before being agreed to or implemented. Any such incentive will be independently evaluated as to whether there is an actual or potential conflict of interest.

Employees should take the necessary steps to ensure that the Company's intermediaries, consultants, distributors, agents, and representatives are familiar with, understand, and adhere to the applicable policies contained in thisAddendum.

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6.7 Contracts, Commitments and Scope of Authority

No Employee may agree to or sign any document, contract or agreement binding the Company without express authorization by an authorized Company Employee.

The Company has instituted contract and signature approval policies that identify those Employees who have authority to approve and sign certain contracts binding the Company. Employees may only bind the Company to contract terms if authorized to do so based on job title and function, as defined in the applicable authority matrix. If there are any questions about which Employees have signature authority for a given contract, contact the Corporate Legal Department. In addition, there are policies governing which suppliers the Company may use. All supplier contracts should be reviewed by Procurement.

An Employee should never say or write anything including, for example, entering into a letter of intent, memorandum of understanding, letter agreement, or side letter that could be construed by another party as a commitment by the Company, unless expressly authorized to do so. Any questions about what constitutes a legal commitment should be directed to the Compliance Team.

In addition to understanding and following this Addendum, each Employee has an independent obligation to understand the level of authority associated with their position. Employees must be careful to act within the limits of that authority for all business activities. In addition to negotiating and signing contracts, this includes approving employment or business-related requests. Employees must not act, or appear to act, beyond the scope of the authority associated with their role.

For further information see NTT DATA Group Business Code of Business Ethics “4.1 Implementing Good Corporate Governance” and any other applicable NTT DATA compliance policy

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7 Doing Business Globally

7.1 No Payments to Low-Level Non-U.S. Governmental Employees and Officials

U.S. law permits certain “facilitating” payments to obtain or expedite the performance of commonly performed, routine, nondiscretionary government action by a foreign government official (note that facilitating payments to U.S. officials are not permitted). Examples of facilitating payments include obtaining official documents to qualify a person to conduct business; processing government papers such as visas and work orders; providing police protection, mail service, and phone service; and loading and unloading cargo.

The Company adopts a zero-tolerance approach to facilitating payments. Any facilitating paymentsmade by Employees or agents, except in the emergency circumstances outlined below, is a violation of this Addendum.

Employees or agents are only permitted to make a facilitating payment in circumstances where they are exposed to an immediate threat of loss of life, limb, or liberty. Once the immediacy of the situation has been resolved, the matter should be reported to the Compliance Team and fully and accurately recorded on the Company’s books.

If there are questions regarding the reporting of facilitating payments, contact the Corporate Legal Department or a member of the Compliance Team.

For further information see NTT DATA Group Business Code of Business Ethics “3.1. Standing Against Bribery and Corruption” and any other applicable NTT DATA compliance policy

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8 The Government, Securities Laws and the Media

8.1 Government Contracting

The Company is committed to conducting business in accordance with all applicable laws and regulations and with the highest ethical standards. Detailed laws and regulations govern virtually every aspect of doing business with a country's government and their provincial, state, and local governments and agencies. Employees must adhere to the highest standards of honesty and integrity in their relations with government officials and employees, including, without limitation, observing the following principles when disclosing information related to, bidding on, or performing under government contracts:

- Employees should comply with the requirements of all applicable government acquisition and other regulations, including, with respect to the US Government, the Armed Services Procurement Act, the Buy American and Trade Agreements Acts, the False Claims Act (FCA), the Federal Acquisition Regulation, the Procurement Integrity Act, the Truth in Negotiations Act, and all agency-specific acquisition regulations, cost principles, and Cost Accounting Standards. For example, Employees should refrain from engaging in any conduct that could be deemed to violate the FCA or otherwise mislead the US Government or any higher tier prime contractor.
- Employees should: (1) ensure that their time is properly recorded, (2) verify that each invoice for which they are responsible lists the correct product or service, quantity, and price; (3) ensure that products and services comply with applicable contract requirements, including appropriate signature approvals; (4) and refrain from making any representation, certification, or statement unless it is known and approved by the Corporate Legal Department and known for certain to be true.
- No Employee or agent of the Company should engage in prohibited discussions, offer gratuities, or solicit or receive proprietary or source selection information from a government official. No Employee or agent of the Company should subject themselves or the Company to civil or criminal penalties by presenting false claims or false statements to an agency or agent of a government.
- No Employee or agent of the Company should offer or provide money, meals, transportation, gifts, or other consideration to any government employees who are prohibited from receiving such consideration. If government employees or representatives are present at conferences or meetings at which the Company is providing refreshments or a light meal, a contribution basket should be placed conspicuously next to the refreshments so that the government employees or representatives may contribute an appropriate amount for the cost of any refreshments or meals they consume.
- Employees should comply with all government election requirements and adhere to Company practices and policies related to such requirements (including, without limitation, those listed in Section 8.4 of this Addendum) concerning political contributions and their limitations, including reporting requirements, on money, gifts or travel imposed by government legislatures.

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- Employees should comply with applicable regulations concerning the employment of (or discussions concerning possible employment with) current and former officials and employees of governmental agencies, including so-called “revolving door” restrictions. Obtain all appropriate government approvals prior to recruiting or hiring current and former government employees.
- Employees should comply with all export regulations and obtain appropriate licenses prior to exporting or even discussing government customer data and technologies with citizens of other countries, even if they are located in the country where the Employee is located. With respect to export activities occurring in and from the United States, Employees should comply with all applicable government requirements, including without limitation the Export Administration Regulation and the International Traffic in Arms Regulation.
- Employees should adequately safeguard sensitive and classified information belonging to government customers in accordance with the Company’s and its subsidiaries’ security agreements, and practices and policies and do not disclose such information, even to Employees of Company affiliates, except in accordance with applicable government security regulations and as expressly authorized by Company directives and policies.
- Employees should complete in accordance with Company policies and instructions all ethics and other training curriculum that is required by the Company to be completed and made available to Employees.

These guidelines are not intended to be all-inclusive, and Employees who transact business with the government or work on matters relating to government contracts should familiarize themselves and comply with all applicable laws and regulations as well as the Company’s (including, for the avoidance of doubt, its subsidiaries’) security and other agreements, practices and policies on interacting and contracting with government officals, employees, and agencies.

Employees should immediately report to the Corporate Legal Department or the Compliance Team any actual or suspected violation of these important government rules and principles**.** Questions relating to these laws, regulations, or any other aspect of doing business with the government should be referred to the Corporate Legal Department or the Compliance Team.

8.2 Antitrust

Antitrust rules limit what companies can do with other companies and what companies can do on their own. Generally, the antitrust laws are designed to prohibit agreements or actions that reduce competition and harm consumers. Under no circumstances may an Employee enter into an agreement, or discuss entering into an agreement, with a competitor that restricts competition by fixing or controlling prices, wages, salaries, or other benefits, refraining from hiring or attempting to hire each other’s employees, limiting innovation or delaying a new product or service launch, rigging bids, dividing and allocating markets, territories, or customers, boycotting suppliers or customers, sharing competitive sensitive information, or by any other means. United States and foreign antitrust laws also apply to imports and exports.

Additionally, Employees should not engage in the following specific activities without prior approval from the Compliance Team:

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- Sharing marketing plans or business policy matters.
- Submitting a joint bid or “teaming” with another company on projects.
- Working with competitors to establish industry-wide standards.
- Requiring a customer to buy one product or service from the Company in order to be able to buy a second product or service from the Company.
- Requiring a customer to buy products or services only from the Company and not from a competitor.
- Requesting a supplier to buy from the Company in exchange for the Company buying from the supplier.
- Agreeing with a customer or supplier on the price or other terms on which a product or service can be resold.
- Refusing to deal with someone who wants to buy Company products or services or cutting off someone who already buys them.
- Refusing to buy from a supplier that deals with one of the Company’s competitors.
- Trying to persuade a customer or supplier, or any other person to do business with the Company and to stop doing business with a competitor with whom it has a contract or continuing business relationship.

  Any questions regarding these activities or requests for an exception to these rules should be directed to the Compliance Team.

8.3 Political Contributions

No political contributions are to be made using Company funds or assets, or the funds or assets of any Company subsidiary, to any political party, political campaign, political candidate, or public official in the United States or any other country, unless the contribution is lawful and expressly authorized in writing by the Company’s Chief Financial Officer and Corporate Legal Department. In addition, no Employee may make a political contribution on behalf of the Company or its subsidiaries, or with the appearance that such contribution is being made on behalf of the Company or its subsidiaries, unless expressly authorized in writing by the Company’s Chief Financial Officer and Corporate Legal Department.

Nothing in this policy is intended to discourage Employees from making contributions of their own time and/or funds to political parties or candidates of their choice. However, Employees will not be compensated or reimbursed by the Company for any personal contributions.

Rules and laws concerning United States political action committees (“PACs”) govern contributions to and by PACs. In the event the Company permits the formation of one or more PACs, Employees must comply with all rules and laws applicable to contributing to those organizations.

For further information see NTT DATA Group Business Code of Business Ethics “4.4 Contributing to a Sustainable Environment and Society” and any other applicable NTT DATA compliance policy

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8.4 Government Requests for Information, Litigation and other Legal Actions

Employees may be asked by law enforcement or other authorities to provide information in connection with an investigation, lawsuit, or other activity. Employees may also become aware of actual or contemplated litigation or other legal activity potentially involving the Company, whether or not related to a government inquiry.

If an Employee becomes aware of pending, imminent or contemplated government investigation, legal action, or other requests for information in connection with a legal action, they must immediately contact the Legal Department.

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9 Compliance and Reporting

9.1 Reporting Procedures and Other Inquiries

The Company seeks to create an ethical culture that empowers everyone associated with the Company to do the right thing and to speak up when they see or suspect any misconduct. It is essential that all employees, clients, third parties and communities are given the opportunity to raise any concerns about suspected or actual unethical behavior or misconduct without fear or threat of retaliation.

Anyone having knowledge of, or questions or concerns about, an actual or possible violation of the provisions of the Code or this Addendum must immediately report the matter to their leader or via one of the options below.

- Online via the anonymous and confidential SpeakUp channel at SpeakUp
- Over the phone by dialing your country specific number outlined here: Global Phone Numbers
- The Compliance Team: Compliance.Team@nttdata.com
- The Employee Relations CoE, via the Employee Service Center
- The HR Business Partner assigned to your team
- Internal Audit

9.2 Investigations

Employees have an obligation to cooperate fully, truthfully, and candidly with all Company investigations of alleged violations of the NTT DATA Group Code of Business Ethics and this Addendum or other company policies. Failure to cooperate or to be truthful in an investigation may lead to discipline up to and including termination, consistent with local law.

Retaliation against anyone who makes a good faith complaint of improper conduct, or who cooperates with an investigation into such conduct, will not be tolerated.

Investigations into alleged violations of the Code, this Addendum or any Company policy may be conducted by one or more members of the Compliance Team, HR, Internal Audit, and others, including outside counsel or other third parties.

9.3 Discipline

Any Employee who violates the provisions of the Code or this Addendum will be subject to disciplinary action, up to and including termination.

In addition, any Employee who retaliates against someone for reporting a potential violation in good faith, or for participating in an investigation in good faith, may face disciplinary action, up to and including termination.

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9.4 The Compliance Team

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10 Global Whistleblowing Reporting Phone Numbers

Country	Phone instructions	Organization code
Angola	+244 226 425 610 Call charged at local rate	126375
Argentina	+54 11 2039 7280 Call charged at local rate	126375
Australia	+61 2 8284 6262 Call charged at local rate	126375
Austria	0800 909 683	126375
Belarus	8 820 0491 0089	126375
Belgium	0800 89 326	126375
Botswana	800 786 1103	126375
Brazil	+55 (11) 4700 8838 Call charged at local rate	126375
Bulgaria	00800 2100645	126375
Cambodia	1800 209 867	126375
Canada	+1 (514) 395 0496 Call charged at local rate	126375
Chile	+56 22 483 5917 Call charged at local rate	126375
China	400 120 1842 Call charged at local rate.	126375
Colombia	+57 601 242 1247 Call charged at local rate	126375
Czech Republic	800 050 833	126375
France	080 554 3753	126375
Germany	0800 1818 952	126375
Ghana	+233 59 699 3553 Call charged at local rate	126375
Hong Kong	+852 3019 4193 Call charged at local rate	126375
Hungary	06 809 845 89	126375
India	0008 0005 03159	126375
Indonesia	+62 21 8063 0074 Call charged at local rate	126375
Ireland	1800 800 636	126375
Italy	800 147 694	126375
Japan	+81 3 6627 0734 Call charged at local rate	126375
Kenya	+254 20 765 0957 Call charged at local rate	126375
S. Korea	+82 2 3700 5146 Call charged at local rate	126375
Laos	N/A	126375
Luxembourg	+352 342 080 8982 Call charged at local rate	126375

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Country	Phone instructions	Organization code
Macao	N/A	126375
Malaysia	+60 3 7724 3136 Call charged at local rate	126375
Mexico	+52 55 4780 6198 Call charged at local rate	126375
Mozambique	N/A	126375
Myanmar	0800 800 8062	126375
Namibia	+264 83 380 0103	126375
Netherlands	+31 10 700 75 03 Call charged at local rate	126375
New Zealand	+64 9 913 5892 Call charged at local rate	126375
Nigeria	070 8060 1221	126375
Norway	+47 24 14 06 01 Call charged at local rate	126375
Philippines	1800 8394 8474 Can only be connected by Globe Telecom device	126375
Poland	800012953	126375
Portugal	800 831 302	126375
Russia	8 (800) 100 69 94	126375
Saudi Arabia	800 850 1433	126375
Singapore	+65 6403 7051 Call charged at local rate	126375
Slovakia	0800 113 418	126375
South Africa	+27 (21) 427 7937 Call charged at local rate	126375
Spain	+34 900 031 156 Call charged at local rate	126375
Sweden	020 160 4703	126375
Switzerland	080 000 5691	126375
Taiwan	+886 2 7743 8912 Call charged at local rate	126375
Tanzania	0800 11 1020	126375
Thailand	+66 2 844 9693 Call charged at local rate	126375
Turkey	0080 04488 28602	126375
Uganda	+256 41 423 8162 Call charged at local rate	126375
Uruguay	000-413-598-5762	126375
United Arab Emirates	800 0444 0408	126375
United Kingdom	080 0022 4118	126375
United States	+1 (669) 288 7154 Call charged at local rate	126375
Vietnam	+84 1900 3271 Call charged at local rate	126375
Zambia	N/A	126375

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