

Reporting period: 1 April 2025 – 31 March 2026

FY25 CSRD-aligned Voluntary Report

Sustainability statement of non-financial sustainability information prepared in alignment with the European Sustainability Reporting Standards (ESRS)

Get started

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CEO & CSO Foreword

A shared responsibility for our future

We are entering an era in which two transformations are accelerating at the same time: the rapid expansion of artificial intelligence and the growing need to build a more resilient, sustainable economy. For NTT DATA, these are not separate agendas. Together, they are reshaping how we invest, innovate, operate and create value for our clients and society.

At the same time, we are living through a period of extraordinary technological change. Artificial intelligence is opening possibilities that only a few years ago seemed beyond reach, with the potential to accelerate discovery, improve services and help solve complex global challenges. It is reshaping industries, redefining value chains and changing the nature of work itself.

But progress is rarely without consequence. As demand for AI and digital infrastructure grows, so does our responsibility to understand and address the environmental and social impacts of that growth. As NTT DATA works to build the leading AI-native services company of the future, AI must sit at the core of how we innovate and serve our clients.

The growth of AI does not weaken our sustainability commitments; it makes them more important. Our responsibility is not to choose between technological progress and sustainability, but to ensure they advance together. The NTT DATA Net-Zero Vision to achieve net-zero in our data centers by 2030 (Scopes 1 and 2), in our offices and other facilities by 2035 (Scopes 1 and 2), and in our value chain by 2040 (Scope 3) continues to guide our actions, reflecting our belief that technological progress and sustainability must advance together.

Technology can also accelerate the transition. AI, data, digital twins and intelligent platforms can help organizations better understand the connections between climate, water, resources and nature, moving sustainability beyond measurement and disclosure toward better decision-making, optimization and measurable outcomes.

This report is also an important step forward in how we hold ourselves accountable. Although we are not yet required to report under the European Union's Corporate Sustainability Reporting Directive, we have chosen to voluntarily align with its principles ahead of the mandatory timeline. Transparency should not begin when regulation demands it. By acting now, we can strengthen the quality of our data, governance and decision-making, while identifying where we still need to improve. This is not simply preparation for future compliance; it is part of building a stronger and more accountable business today.

This reflects an important evolution in our approach: from compliance to value creation, from managing sustainability primarily as a risk to understanding its contribution to performance, and from commitments to measurable outcomes.

Planet Positive

Our Planet Positive commitment remains central to our strategy. We continue to decarbonize our operations, increase renewable energy, improve resource efficiency and circularity, and develop more sustainable digital infrastructure.

We recognize that AI increases demand for computing power and digital infrastructure. The rapid growth of AI makes this work more urgent. More computing capacity means greater demands on energy. Our response must be to improve efficiency, increase renewable energy use, strengthen circularity and build digital infrastructure responsibly and resiliently.

Technology can also accelerate the transition itself. AI, data, digital twins and intelligent platforms can help move sustainability beyond measurement and disclosure toward better decision-making, optimization and measurable outcomes, enabling organizations to understand complex systems and act on them with greater speed and precision.

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Prosperity Positive

Our Prosperity Positive pillar focuses on creating lasting value through sustainable innovation, responsible technology and stronger partnerships across our value chain. We are already demonstrating how responsible innovation can create both business and societal value — from AI-enabled cancer research and smarter infrastructure to responsible AI, sustainable supply chains and secure digital services.

These examples also demonstrate a broader opportunity for NTT DATA. Sustainability can strengthen our relevance with clients, differentiate our capabilities and create new technology-enabled opportunities. Our Intelligence to Impact ambition is particularly relevant here: helping close the gaps between complexity and clarity, ambition and value, by combining human insight, technology, data and AI.

We also strengthened responsible technology and AI ethics governance through the implementation of the NTT Group AI Charter and responsible-use policies for AI platforms; these are critical for responsibly embedding AI in strategic decision-making. In parallel, we deepened engagement with priority suppliers to improve emissions transparency, strengthen decarbonization and circularity collaboration, and inform future supply chain priorities.

Credibility, however, starts with us. Through our “Client Zero” mindset, we apply transformation within NTT DATA first — learning from our own experience and using those lessons to create greater impact for our clients. That requires every part of NTT DATA to understand our three Positives and 13 material topics and translate them into decisions and action. We must lead by example. A strong strategy is only the beginning. Execution, accountability and leadership turn ambition into results.



People Positive

Technology is ultimately about people. Through our People Positive pillar, we continue to invest in an environment where people can thrive and in communities where digital access, skills and opportunity can support more inclusive growth.

As technology and AI transform the nature of work, developing our people, strengthening inclusion, protecting human rights and expanding access to digital opportunity become even more important. Technology ultimately creates value through people — and our ability to grow sustainably depends on enabling our people to grow with us.

Around 100,000 employees participated in our One Voice survey, while our refreshed employee promise, “Make this the place where you grow,” reinforced how we attract, engage and develop talent. We increased female manager representation from **28.6% in FY24 to 30.1% in FY25**, and NTT DATA was certified as a Global Top Employer for the third consecutive year across 37 countries and regions.

Beyond our workforce, we supported digital accessibility through upgraded school infrastructure and science, technology, engineering and mathematics (STEM) education in India, reaching more than **61,655 children** in underserved communities. Across 32 countries, our people contributed more than **32,947 volunteer hours,** alongside **$3.6 million in cash donations** and goods donations supporting the communities in which we operate.

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Working together for our sustainable future

Partnerships are fundamental to our approach. The scale and complexity of the challenges ahead mean that no company can address them alone. Through the World Economic Forum, including its Centre for Nature and Climate, we engage in strategic discussions on climate, nature and sustainable infrastructure. As a member of the World Business Council for Sustainable Development, we contribute to workstreams on climate action, nature action and circular products and materials. We are also a member of the Biodiversity Credit Alliance, supporting the development of a credible, transparent and scalable biodiversity credit market.

These partnerships connect NTT DATA to the conversations shaping future markets and, combined with our technology capabilities and global client base, give us an opportunity to translate emerging sustainability priorities into practical solutions at scale.

Our leading performance is also recognized by analysts, with NTT DATA recognized in sustainability-related assessments conducted by Everest Group, Forrester, IDC and ISG, reflecting the strength of our sustainability services, digital innovation and expanding capabilities in areas such as net-zero consulting, sustainable IT, carbon management and circular solutions.

Looking ahead

The future will bring further change, complexity and challenge. AI will continue to test how businesses balance innovation, resource use and societal responsibility. We believe this creates a powerful opportunity for NTT DATA.

The physical impacts we increasingly see around the world are only the visible part of the story. Behind them, resilience, energy, resources, supply chains, regulation, capital and, ultimately, corporate value are being reshaped. Sustainability therefore will not simply become another item on the corporate agenda; it will increasingly become part of how companies compete, invest and grow.

We want to be a business that treats AI strategy as business strategy: never siloed, never secondary, but embedded in the decisions that drive our growth and transformation. And we believe sustainability must be equally embedded — not as a parallel agenda, but as part of how we compete, invest, innovate and grow. By applying these capabilities to our own business first, we can help clients adopt AI with greater confidence, stronger governance and measurable impact, while ensuring long-term prosperity remains inseparable from the health of our planet and the strength of our society.

We have the technology, talent, client trust, partnerships and global reach to help shape what responsible digital growth looks like. Realizing that opportunity will require us to act as one global team and, above all, maintain strong leadership and executive sponsorship. Strategy defines the ambition; leadership and execution convert it into business impact.

Our journey is far from complete. The path ahead will not be simple, but our responsibility is clear: to help shape a digital future guided by human insight, powered by AI and built on trust. A future that accelerates client success and positively impacts society through responsible innovation.

That is our responsibility, our opportunity and the commitment we reaffirm through this report.



Abhijit Dubey

Chief Executive Officer and Chief AI Officer, NTT DATA, Inc.



David Costa

Chief Sustainability Officer, NTT DATA, Inc.

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Introduction

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About NTT DATA

NTT DATA, Inc. is a trusted global IT innovator of digital business and technology services.

NTT DATA, Inc is part of the NTT Group, a leading, global technology services company headquartered in Tokyo, Japan, and is part of the NTT DATA Group with parent company NTT DATA Group Corporation, also headquartered in Tokyo, Japan.

In this document, “NTT DATA,” “the company,” and “we/us/our,” refer to NTT DATA, Inc. “The Group” refers to **NTT DATA Group Corporation.**

The NTT DATA philosophy: Mission and values

Creating a corporate culture of responsible innovation

NTT DATA is undergoing a significant transformation as it adapts to the rapidly evolving global business environment. This includes changes to NTT DATA’s business portfolio following the integration of NTT, Inc. into the NTT DATA group’s overseas business in 2022 as well as the rapid advancement and deployment of cutting-edge technologies in all sectors. As of 2025, NTT DATA operates in more than 70 countries and regions worldwide with approximately 200,000 employees.

Against this backdrop, our mission, values and culture have been renewed, providing a common foundation for navigating the future successfully while maintaining respect for people and society.

Disclaimer

(a) this statement is voluntary and prepared in advance of mandatory CSRD applicability;
(b) it does not constitute a sustainability statement under Articles 19a or 29a of the Accounting Directive;
(c) it is not subject to statutory assurance requirements; and
(d) formal CSRD applicability is expected for FY27, at which point ESRS compliance is targeted.



Mission

Accelerate client success and positively impact society through responsible innovation.

Culture

Be the place where people grow.

The aspirational culture we aim to build, which enables our organization and our people to realize their potential, and supports achieving our mission and acting on our values.

Code of Business Ethics

Our Code of Business Ethics defines how NTT DATA and our people are expected to conduct themselves – ethically, in compliance with the law, and with respect for people and society.

→ Code of Business Ethics

Values

Respect every voice.

We grow by listening. We invite different viewpoints, honor every background and encourage sharing perspectives to learn from one another.

Think big. Be bold.

We stretch beyond what’s expected. Curiosity fuels us, ambition drives us and innovation is how we push boundaries to shape the future.

Deliver the outcome.

We build trust by keeping our word. We act with integrity and hold ourselves accountable, always choosing to do the right thing.

Win together.

We lift each other up. We collaborate across borders, share openly and succeed as one global team.

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Sustainability is becoming embedded in all we do

We recognize the importance of embedding sustainability across our company, and we are making significant investments to address sustainability challenges faced by our business and our clients.

By regenerating our planet, supporting economic progress and building an inclusive society, NTT DATA aspires to achieve our company mission to accelerate client success and positively impact society through responsible innovation.

Our sustainability strategy has three pillars, focusing on the planet, prosperity and people:

Planet Positive

Prosperity Positive

People Positive

Our material topics

Based on a double materiality assessment aligned to the European Sustainability Reporting Standards (ESRS), we have identified 13 material topics as priority themes for sustainability management across NTT DATA.

Each material topic is mapped under Planet, Prosperity or People Positive and connects environmental, social and economic priorities to guide how the company manages impacts, addresses risks and opportunities, and creates long-term value for society.



Lead by example, to disrupt industries for good, innovating services and solutions to regenerate our planet.

- Climate Change
- Circularity
- Water Management



Transform businesses and society for successful growth, with sustainable services and solutions.

- Innovation through Technology
- Responsible Technology and AI Ethics
- Sustainable Supply Chain
- Digital Safety and Reliability
- Secure and Sustainable-by-design Services and Solutions



Shape a better world for all, applying our digital capabilities to improve livelihoods and contribute to an inclusive society.

- People-centric Company
- Diversity and Inclusion
- Health and Safety
- Human Rights
- Digital Accessibility

A foundation for action

Our philosophy provides the foundation for how NTT DATA creates value, linking our corporate philosophy, mission, values, culture and Code of Business Ethics with the behaviors expected across the organization.

Within this framework, the three Positives and 13 material topics define the environmental, social and economic priorities that guide sustainable development and help translate our mission into action. Together, they connect our commitment to responsible innovation with the issues that matter most to our business and stakeholders. They also help ensure that sustainability is reflected in our initiatives, nonfinancial indicators and strategic focus areas as we advance to our next phase of quality growth.

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[ESRS 2 BP-1, BP-2]

Basis for preparation

Other reporting frameworks and legislation referenced

This sustainability statement aligns with the Corporate Sustainability Reporting Directive (CSRD) and has been prepared by NTT DATA, Inc. on a voluntary basis, in accordance with the European Sustainability Reporting Standards (ESRS) as the third-country parent undertaking of NTT DATA, Inc.

It does not constitute full ESRS compliance.

Example of a reference to an ESRS standard: ESRS E1

Where:

ER = European Sustainability Reporting Standards

E1 = the standard

To complement ESRS-aligned disclosures and support transparent, useful reporting, this statement also references other recognized sustainability frameworks and legislative requirements, where relevant.

These include:

- Task Force on Climate-related Financial Disclosures (TCFD)
- IFRS Sustainability Disclosure Standards
- Transition Plan Taskforce (TPT) framework
- Science Based Targets initiative (SBTi) criteria
- Applicable modern slavery legislation

Time horizons

NTT DATA defines its time horizons for the identification, assessment and management of impacts, risks and opportunities in alignment with its strategic planning, target-setting and risk management practices.

With reference to the FY25 reporting period, the following definitions have been applied:

Short term	Medium term	Long term
Up to 6 years	More than 6 years; up to 10 years	More than 10 years
Including milestones such as 2030	Including milestones such as 2035	Including milestones such as 2040 and 2050

These time horizons reflect our business model and the timing of key sustainability commitments, including climate targets, double materiality assessment timeframes and long-term scenario analysis, and are intended to support the consistent and decision-useful assessment of sustainability-related impacts, risks and opportunities.

Basis for preparation of sustainability statement

This statement is prepared on a consolidated basis for NTT DATA, Inc. and covers NTT DATA, Inc. and the legal entities included in the consolidation scope as listed in Annexure C.2: Legal entities covered by this report.

→ Annexure C.2: Legal entities covered by this report

Value chain coverage

The statement contains partial upstream value chain coverage through supplier expectations and due diligence. For example, supplier requirements and supply chain sustainability guidelines referenced in the Modern Slavery Statement, supplier vetting/onboarding due diligence, and human rights due diligence (HRDD). Downstream value chain coverage for people impacts is covered by references in the Code of Business Ethics, which sets out responsible business practices and ethical technology considerations.

→ Code of Business Ethics

Changes in preparation and presentation

No changes were identified as this is NTT DATA, Inc.’s first CSRD-aligned voluntary report.

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[ESRS 2 SBM-1, SBM-2]

Strategy, business model and value chain

Description of significant groups of products and (or) services offered

Description of significant markets and (or) customer groups served

NTT DATA operates as a global provider of IT and digital transformation services, serving diversified markets and customer groups in more than 70 countries. The business delivers integrated, end-to-end services, including consulting, system development, managed services, data center operations and AI-enabled solutions, supporting clients' digital transformation, operational resilience and long-term value creation.

Significant markets include public and social infrastructure, financial services, and enterprise and industry sectors, including manufacturing, retail, healthcare, telecommunications, transportation, energy and life sciences. NTT DATA also serves global enterprises, hyperscalers and other technology-driven organizations through data center, connectivity, cloud and digital infrastructure services. Across these markets, the company maintains long-term relationships with governments, financial institutions, multinational corporations and other strategic clients, supported by recurring service models and global delivery capabilities.

During the reporting period, there were no material exits from markets or customer groups. Instead, we continued to strengthen our global operating model, expand advanced technology offerings and grow infrastructure-related services in response to increasing demand for cloud, data, generative AI and digital infrastructure.

We also enhanced our service portfolio classification to align with our global management structure and reporting framework. These developments reinforce the resilience and diversification of our business model and support our strategy to deliver sustainable value to clients and society through innovation and responsible technology adoption.

NTT DATA, Inc. FY25	Total revenue: $19,981,788,303

[ESRS 2 IRO-1, SBM-3]

Double materiality assessment (DMA)

Description of material impacts resulting from materiality assessment

NTT DATA identified its material impacts through the double materiality assessment in line with the European Financial Reporting Advisory Group (EFRAG) guidelines. The main impacts are summarized here, and further detail is provided in Table 1.

Material impacts relate primarily to climate change, resource use and the application of digital technologies, and occur across NTT DATA's own operations as well as its upstream and downstream value chain.

Negative impacts are associated mainly with environmental pressures, including greenhouse gas emissions and water use, which may affect natural ecosystems and local communities.

Positive impacts arise from the provision of digital solutions and services that contribute to improved quality of life, enhanced access to services and the protection of users' rights.

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Table 1: Material impacts resulting from materiality assessment

					Value Chain Location			Impact	
NTT DATA Strategic Pillar	**Material Topic**	**ESRS Topic(s)**	**IRO Type**	**Description**	**Upstream**	**Own operations**	**Downstream**	**Actual**	**Company-specific**
Planet Positive	Climate Change	**E1: Climate Change** - Climate change mitigation - Energy	Negative impact	Deterioration of people's physical and mental health caused by increased heat stress and heat waves caused by rising temperatures	✓	✓	✓	✓	
Planet Positive	Climate Change	**E1: Climate Change** - Climate change mitigation - Energy	Negative impact	Deterioration of people's physical and mental and destruction of the living environment caused by the intensification of natural disasters caused by rising temperatures	✓	✓	✓	✓	
Planet Positive	Water Management	**E3: Water and Marine Resources** – Water	Negative impact	Deterioration of physical and mental health and decline in the quality of living environments for people in society caused by the reduction in water availability and the degradation of natural environments and ecosystem services, resulting from water withdrawal and consumption by our company and suppliers	✓	✓		✓	
Prosperity Positive	Innovation Through Technology	**N/A**	Positive impact	Improving subjective well-being by improving the convenience of life for people in society by creating innovation while protecting the technologies and intellectual property of our company and other companies		✓	✓	✓	✓
Prosperity Positive	Responsible Technology and AI Ethics	**S4: Consumers and End Users** - Information-related impacts for consumers and/or end users - Social inclusion of consumers and/or end users	Positive impact	Contributing to the prevention of a decline in the subjective well-being of people in society by contributing to the protection of privacy, copyright protection, and the prevention of discrimination in the use of AI by client companies		✓	✓	✓	
Prosperity Positive	Digital Safety and Reliability	**N/A**	Positive impact	Establishing and operating a stable IT system will maintain a stable social infrastructure and improve the subjective well-being of people in society		✓	✓	✓	✓
Prosperity Positive	Secure and Sustainable-by-design Services and Solutions	**S4: Consumers and End Users** - Information-related impacts for consumers and/or end users	Positive impact	Improvement of people's subjective wellbeing through the construction and operation of a stable social infrastructure (including protection of people's privacy rights) by strengthening information security at client companies (Freedom, dignity, and the reduction of psychological harm)		✓	✓	✓	
People Positive	Diversity and Inclusion	**S1: Own Workforce** - Equal treatment and opportunities for all	Positive impact	Creation of new employment opportunities and opportunities for active participation by hiring diverse human resources to change the hitherto unbalanced staffing structure (Gender, age, race, etc.) and create a diverse staffing structure		✓		✓	

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NTT DATA Strategic Pillar	Material Topic	ESRS Topic(s)	IRO Type	Description	Upstream	Own operations	Downstream	Actual	Company-specific
People Positive	Diversity and Inclusion	**S1: Own Workforce** - Equal treatment and opportunities for all	Positive impact	Creating opportunities for employees to flourish through equitable treatment of diverse employees (Providing employment, working environment, treatment, promotion and growth opportunities)		✓		✓	
People Positive	Diversity and Inclusion	**S1: Own Workforce** - Equal treatment and opportunities for all	Positive impact	Creating opportunities for employees to flourish by introducing a personnel system that responds to changes in their life stages		✓		✓	
People Positive	Diversity and Inclusion	**N/A**	Positive impact	Creating opportunities for working people in diverse societies by providing fair employment, working environment, treatment, promotion and growth opportunities by supporting diverse working styles at client companies		✓	✓	✓	✓
People Positive	Health and Safety	**S1: Own Workforce** - Working conditions	Negative impact	Loss of life and damage to physical and mental health due to the occurrence of industrial accidents (including overwork) involving employees of the Company		✓		✓	
People Positive	Human Rights	**S1: Own Workforce** - Working conditions - Equal treatment and opportunities for all - Other work-related rights **S2: Workers in the Value Chain** - Working conditions - Equal treatment and opportunities for all - Other work-related rights	Negative impact	Deterioration of work-life balance due to reduction of employees' private time as a result of inadequate management of mitigation of human rights violations related to wages, working conditions, etc. of in-house and supply chain workers	✓	✓			
People Positive	Human Rights	**S1: Own Workforce** - Working conditions - Equal treatment and opportunities for all - Other work-related rights **S2: Workers in the Value Chain** - Working conditions - Equal treatment and opportunities for all - Other work-related rights	Negative impact	Loss of social ties due to loss of income and reduced private time due to inability to take jobs other than forced labor due to inadequate control of the human rights related to wages and working conditions of company and supply chain workers	✓	✓			
People Positive	Human Rights	**S1: Own Workforce** - Other work-related rights **S2: Workers in the Value Chain** - Other work-related rights	Negative impact	Loss of life and damage to physical and mental health caused by forced labor and child labor	✓	✓			

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NTT DATA Strategic Pillar	Material Topic	ESRS Topic(s)	IRO Type	Description	Upstream	Own operations	Downstream	Actual	Company-specific
People Positive	Human Rights	**S1: Own Workforce** - Other work-related rights **S2: Workers in the Value Chain** - Other work-related rights	Negative impact	Missed opportunities for workers due to forced labor and child labor (Educational opportunities, loss of wages originally obtained, etc.)	✓	✓			
People Positive	Human Rights	**S3: Affected Communities** - Communities' economic, social and cultural rights - Rights of indigenous peoples	Negative impact	Loss of physical and mental health and loss of cultural value of local residents (especially indigenous people) whose living environment and culture are destroyed by the construction and use of data centers and offices	✓	✓			
People Positive	Human Rights	**S4: Consumers and End Users** - Information-related impacts for consumers and/or end users	Negative impact	The occurrence of economic loss to the user if a third party misuses the data due to the leakage of personal information held by the client company		✓	✓		
People Positive	Human Rights	**S4: Consumers and End Users** - Information-related impacts for consumers and/or end users	Negative impact	Degradation of users' subjective wellbeing when privacy rights are violated due to leakage of personal information held by client companies		✓	✓		
People Positive	Digital Accessibility	**S4: Consumers and End Users** - Social inclusion of consumers and/or end users	Positive impact	Reducing inequality in society by ensuring fair and comprehensive access to essential needs of people in society (including the provision of services necessary for social life by client companies), maintaining and improving long-term stable living standards of people in society, and improving subjective wellbeing		✓	✓	✓	
People Positive	Digital Accessibility	**S4: Consumers and End Users** - Social inclusion of consumers and/or end users	Positive impact	Maintenance and improvement of long-term and stable living standards and improvement of subjective well-being of people in society by eliminating digital disparities and allowing them to enjoy the services necessary for daily life in a fair and comprehensive manner through digital means		✓	✓	✓	

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Description of material risks and opportunities resulting from materiality assessment

NTT DATA has identified its material risks and opportunities through the double materiality assessment. The main risks and opportunities are summarized below, and further detail is provided in Table 2.

Material risks are associated primarily with climate-related physical and transition risks, as well as evolving regulatory and market conditions which may affect operations, costs and service delivery.

Material opportunities arise mainly from increasing demand for sustainability-related services, including decarbonization solutions, energy-efficient data centers, and digital services that support social and economic development. These opportunities are closely linked to NTT DATA's business model and contribute to revenue growth and long-term value creation.

Table 2: Material risks and opportunities resulting from materiality assessment

					Value Chain Location			Impact	
NTT DATA Strategic Pillar	**Material Topic**	**ESRS Topic(s)**	**IRO Type**	**Description**	**Upstream**	**Own operations**	**Downstream**	**Actual**	**Company-specific**
Planet Positive	Climate Change	**E1: Climate Change** - Climate change mitigation - Energy	Opportunity	Increasing demand for services that contribute to corporate decarbonization (Offerings related to new sustainability-related services and products, regulatory and compliance services and solutions for increasing regulatory complexity, and consulting services for the realization of a sustainable society) Increase in sales due to expansion of services and customers		✓	✓		
Planet Positive	Climate Change	**E1: Climate Change** - Climate change mitigation - Energy	Opportunity	Increasing demand for data centers using low-emission energy sources (renewable energy, hydrogen, etc.) Sales growth due to expansion of green data center business and customers		✓	✓		
Planet Positive	Climate Change	**E1: Climate Change** - Climate change mitigation - Energy	Opportunity	Expanding business opportunities as new requirements change faster Increase in sales due to expansion of services and customers		✓	✓		
Planet Positive	Climate Change	**E1: Climate Change** - Climate change adaption	Risk	Increased costs of responding to the physical risks of climate change (Changes in precipitation and weather patterns, increase in average temperature, sea level rise, drought, etc.) Increased expenses due to increased risk response costs		✓	✓		

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NTT DATA Strategic Pillar	Material Topic	ESRS Topic(s)	IRO Type	Description	Upstream	Own operations	Downstream	Actual	Company-specific
Planet Positive	Circularity	**E5: Circular Economy** - Resource inflows, including resource use - Resource outflows related to products and services - Waste	Opportunity	Expansion of environmental data collection, management and visualization services for waste, etc., and development and expansion of new markets for circular economy-related businesses Increase in sales due to expansion of services and customers	✓	✓	✓		
Prosperity Positive	Innovation Through Technology	N/A	Opportunity	Expansion of business opportunities in existing services due to the transition to a digital society accompanied by technological advancements, such as system efficiency improvements Increase in sales by strengthening existing services		✓			✓
Prosperity Positive	Innovation Through Technology	N/A	Opportunity	Expansion of business opportunities in new areas due to the transition to a digital society accompanied by technological advancements Increase in sales due to expansion of services and customers		✓			✓
Prosperity Positive	Innovation Through Technology	N/A	Opportunity	Expansion of competitive products or services by leveraging our own technologies and intellectual property to create business opportunities Increase in sales through expansion of competitive products or services		✓	✓		✓
Prosperity Positive	Responsible Technology and AI Ethics	**S4: Consumers and End Users** - Information-related impacts for consumers and/or end users - Social inclusion of consumers and/or end users	Opportunity	Increased demand for AI ethics implementation and appropriate AI ethics practices within client companies Increase in sales due to expansion of services and customers		✓	✓		
Prosperity Positive	Sustainable Supply Chain	N/A	Opportunity	Increasing demand for services that help global companies build resilient supply chains (Transparency, efficiency, etc.) Increase in sales due to expansion of services and customers	✓	✓	✓		✓
Prosperity Positive	Sustainable Supply Chain	**S2: Workers in the Value Chain** - Equal treatment and opportunities for all **G1: Business Conduct** - Management of relationships with suppliers including payment practices	Opportunity	Increase in the percentage of highly qualified employees at highly specialized suppliers Increase in sales due to increased labor productivity by securing specialized human resources		✓			

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NTT DATA Strategic Pillar	Material Topic	ESRS Topic(s)	IRO Type	Description	Upstream	Own operations	Downstream	Actual	Company-specific
Prosperity Positive	Sustainable Supply Chain	**S2: Workers in the Value Chain** - Equal treatment and opportunities for all **G1: Business Conduct** - Management of relationships with suppliers including payment practices	Opportunity	Strengthening business competitiveness in the market by responding swiftly and flexibly to diversified and sophisticated customer needs associated with social changes Increase in sales due to customer acquisition by strengthening competitiveness in the market		✓			
Prosperity Positive	Digital Safety and Reliability	N/A	Opportunity	Increased demand for system investment to enhance IT system stability Increase in sales due to expansion of services and customers		✓	✓		✓
Prosperity Positive	Secure and Sustainable-by-design Services and Solutions	**S4: Consumers and End Users** - Information-related impacts for consumers and/or end users	Opportunity	Increased demand for system investment to strengthen and upgrade security Increase in sales due to expansion of services and customers		✓	✓		
People Positive	People-Centric Company	N/A	Opportunity	Increased demand for systems investment to strengthen human capital management Increase in sales due to expansion of services and customers		✓	✓		✓
People Positive	People-Centric Company	N/A	Opportunity	Increase in the proportion of highly qualified and skilled employees Increase in sales due to increased labor productivity by securing specialized human resources		✓			✓
People Positive	People-Centric Company	N/A	Opportunity	Strengthening business competitiveness in the market by responding swiftly and flexibly to diversified and sophisticated customer needs associated with social changes Increase in sales due to customer acquisition by strengthening competitiveness in the market		✓			✓
People Positive	Diversity and Inclusion	N/A	Opportunity	Strengthening business competitiveness in the market by responding swiftly and flexibly to diversified and sophisticated customer needs associated with social changes Increase in sales due to customer acquisition by strengthening competitiveness in the market		✓	✓		✓

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NTT DATA Strategic Pillar	Material Topic	ESRS Topic(s)	IRO Type	Description	Upstream	Own operations	Downstream	Actual	Company-specific
People Positive	Health and Safety	**S1: Own Workforce** - Working conditions	Risk	Stagnation of operations due to accidents caused by industrial accidents (including overwork) and mental health problems Decreased sales due to reduced availability, shutdowns, and lost business opportunities			✓		
People Positive	Digital Accessibility	**S4: Consumers and End Users** - Social inclusion of consumers and/or end users	Opportunity	Increased demand for digital services to improve access to social services (Medical care, education, finance, etc.) for diverse populations Revenue growth due to increased demand for digital services to improve access to social services Positive impact on funding due to the improvement of corporate reputation by investors by responding to market demands			✓	✓	
People Positive	Digital Accessibility	**S4: Consumers and End Users** - Social inclusion of consumers and/or end users	Opportunity	Increasing demand for digital services and infrastructure that can be used by diverse populations as we transition to a digital society that leaves no one behind Increase in sales due to increased demand for the development of digital services as a basis for daily life Positive impact on funding due to the improvement of corporate reputation by investors by responding to market demands			✓	✓	

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[ESRS 2 GOV-1, IRO-1, SBM-3]

Impacts, risks and opportunities (IROs)

Information about the identity of administrative, management and supervisory bodies or individual(s) within the body responsible for the oversight of impacts, risks and opportunities

NTT DATA, Inc. operates within the governance framework of NTT DATA Group Corporation (“the Group”), under which sustainability-related impacts, risks and opportunities are addressed primarily at Group level.

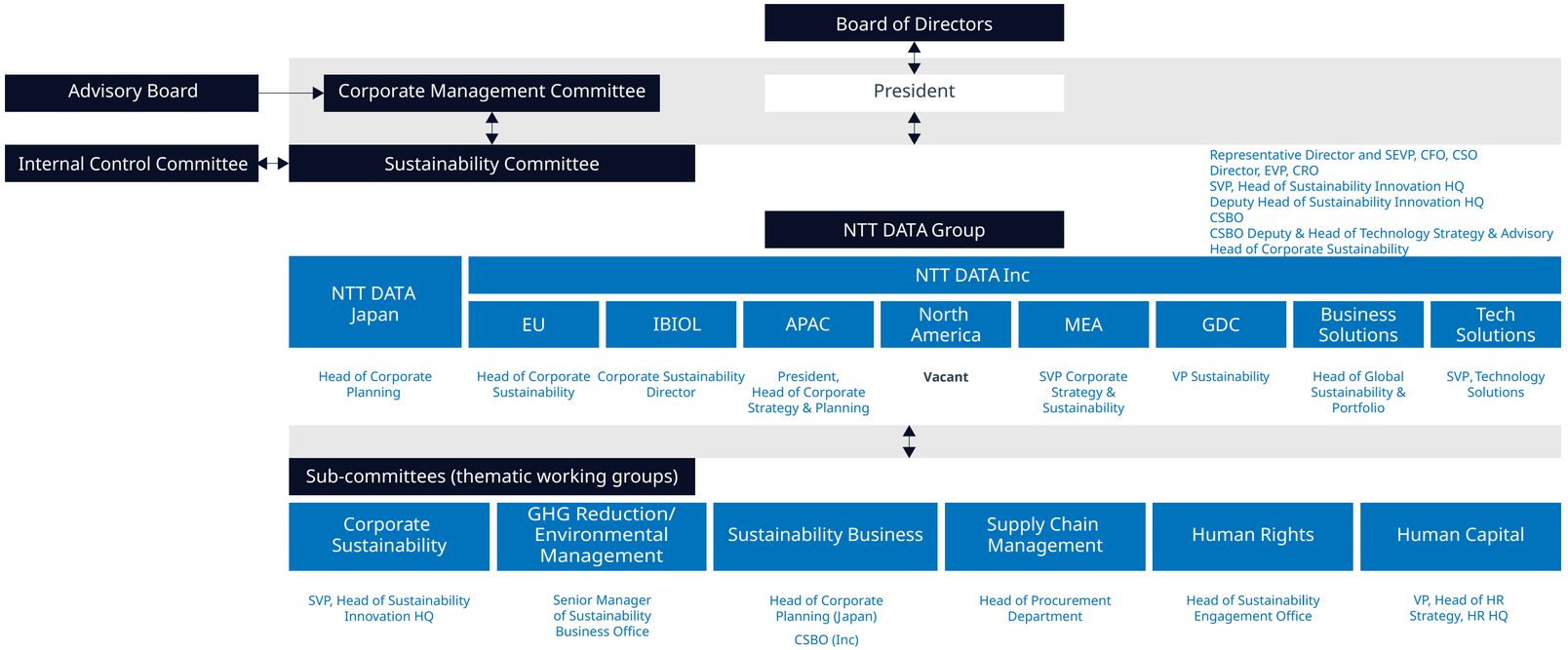
At Group level, sustainability-related matters are discussed by the Board of Directors of NTT DATA Group Corporation, where strategies are presented, policies are determined and monitoring is conducted. Under the leadership of executive management, sustainability-related initiatives are developed and implemented through relevant functions, including the Sustainability Committee.

Sustainability Committee

The Sustainability Committee operates under the oversight of the Board of Directors and is chaired by the Senior Executive Vice President and Representative Director responsible for Corporate Management.

It includes representatives from NTT DATA Group Corporation, NTT DATA Japan Corporation and NTT DATA, Inc., enabling coordination across the Group.

Under the leadership of the President and CEO, Representative Director, the Committee provides recommendations, formulates strategies and monitors initiatives related to sustainability management. In addition, six thematic working groups have been established to strengthen global coordination and enhance effectiveness in the areas of human rights, supply chain management and the environment.



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Sustainability Governance

Chief Sustainability Business Officer

The Chief Sustainability Business Officer (CSBO) of NTT DATA, Inc. concurrently serves as the Chief Sustainability Officer (CSO) of NTT DATA Group, ensuring close alignment between Group-level sustainability strategy and its implementation within NTT DATA, Inc.

Operational execution

At the operational level, executive management of NTT DATA, Inc. is responsible for implementing sustainability-related initiatives and managing relevant impacts, risks and opportunities within their respective areas of responsibility, in alignment with the Group's sustainability strategy and risk management framework.

Governance and double materiality assessment

While the oversight of sustainability-related impacts, risks and opportunities is embedded within existing governance structures, further enhancement of governance processes, including the level of granularity in relation to ESRS-defined impacts, risks and opportunities, remains an ongoing focus.

As part of the Group's governance processes, a double materiality assessment was conducted to identify material sustainability-related impacts, risks and opportunities. The resulting 13 material topics were reviewed and formally approved by the Board of Directors of NTT DATA Group Corporation in June 2025, reflecting the Board's involvement in the oversight of sustainability-related matters.

Disclosure of how bodies or individuals within the bodies responsible for impacts, risks and opportunities are reflected in our terms of reference, board mandates and other related policies

The responsibilities for impacts, risks and opportunities (IROs) are reflected in NTT DATA Group's governance frameworks, including board oversight, internal mandates and related policies.

At Group level, the Board of Directors of NTT DATA Group Corporation oversees sustainability-related matters, including those identified through the double materiality assessment (DMA). The results of the DMA, including the identification of 13 material topics, were approved by the Board in June 2025 and are reflected in the Group's strategic direction.

These responsibilities are further embedded in the mandate of the Sustainability Committee, which formulates sustainability-related strategies, provides recommendations and monitors initiatives across the Group.

Responsibilities for sustainability-related risks are supported by the NTT DATA Group Risk Management Policy, elements of which are referenced in the DMA and related processes.

Sustainability-related responsibilities are supported by the Group's key policies and principles, including Our Way and the NTT DATA Code of Business Ethics. These frameworks define how employees are expected to act in relation to environmental, social and governance matters, and provide the basis for incorporating identified impacts, risks and opportunities into day-to-day business conduct and decision-making.

Within this framework, NTT DATA, Inc. aligns with and implements the Group's policies, mandates and processes in managing impacts, risks and opportunities.

Disclosure of how administrative, management and supervisory bodies and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, and how progress toward them is monitored

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Targets related to material impacts, risks and opportunities are defined in line with the Group's materiality and sustainability strategy.

At Group level, the Board of Directors of NTT DATA Group Corporation oversees sustainability-related targets as part of its review of strategy and materiality, including the outcomes of the double materiality assessment.

The Corporate Sustainability thematic working group under the Sustainability Committee is responsible for formulating and reviewing targets and related indicators linked to material topics, including non-financial indicators such as greenhouse gas emissions and the representation of women in leadership.

Progress against these targets is monitored regularly. Results are reported to the Sustainability Committee and subsequently reviewed by management bodies to assess progress and, where necessary, revise targets and indicators.

At the operational level, executive management is responsible for implementing actions and tracking performance against targets within their respective areas of responsibility.

Information about the resilience of the strategy and business model regarding our capacity to address material impacts and risks and take advantage of material opportunities

Risk

NTT DATA, Inc. assesses the resilience of its strategy and business model through an enterprise risk management process which evaluates our capacity to address material climate-related risks and impacts and to take advantage of material opportunities over relevant time horizons, in line with ESRS 1.

Methodology and time horizons

Resilience is assessed as part of an annual material risk assessment conducted by NTT DATA Group Corporation ("the Group") within the Group's enterprise risk management framework. The assessment considers short-, medium- and long-term time horizons and is based on an analysis of internal and external developments, including regulatory, environmental, technological and market factors. Executive management interviews across the Group and NTT DATA, Inc., and relevant Group entities are used to capture leadership perspectives on risk exposure, strategic priorities and emerging trends.

Identified material risks are reviewed by NTT DATA, Inc. and adapted to reflect business-specific characteristics. The resulting specific material risks are approved by the NTT DATA, Inc. Risk and Compliance Committee.

Each material risk is assessed using a consistent methodology that evaluates inherent risk and residual risk, considering the design and operating effectiveness of existing controls and mitigation measures. Key risk indicators and associated targets are defined to support ongoing monitoring and management.

This process supports a qualitative assessment of resilience by evaluating the robustness of controls, governance arrangements and strategic responses to climate-related risks across relevant time horizons, in accordance with ESRS E1 AR 16.

Climate change as a material risk

Climate change has been identified as one of NTT DATA's material risks. Both the inherent and residual risk ratings are assessed as medium, reflecting exposure to climate-related transition and physical risks, and the mitigating effect of existing controls.

The assessment demonstrates that climate-related risks are integrated into the organization's strategy, risk management and operational planning, supporting the resilience of the business model in line with ESRS E1 AR 19.

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Controls, mitigation measures and strategic response

Key mitigation measures include decarbonization targets and climate-resilient business continuity arrangements.

Annual Scope 1 and Scope 2 CO_2e reduction targets are established at Group level and cascaded to regions and business units. These targets are supported by executive remuneration incentives. For FY25, the key risk indicator is the achievement of the Group CO_2e reduction target of 286kt CO_2e. Control effectiveness is assessed as partially effective, with mitigation actions ongoing.

In addition, NTT DATA, Inc. implements a climate-resilient infrastructure and business continuity strategy. Data centers under the financial and operational control of NTT DATA, Inc. are designed and maintained to ensure continuity during extreme weather events, supported by climate monitoring, redundant systems, and the regular testing of incident and crisis response plans. Climate considerations are integrated into facility planning, modernization and technology replacement. The associated key risk indicator is the percentage of data centers under NTT DATA's financial and operational control with a business continuity management system compliant with ISO 22301, with a target and FY25 actual of 100%.

These measures support operational resilience and enable us to manage climate-related risks while positioning the business to benefit from transition-related opportunities.

Governance and monitoring

Climate-related risks are governed by the Risk Management Policy and Risk Management Framework, which define roles, responsibilities, and escalation and reporting processes. From Q4 FY25, risk exposure, mitigation status and key risk indicators have been reported quarterly to the NTT DATA, Inc. Risk and Compliance Committee. At Group level, NTT DATA Group Corporation reports to the Group Internal Control Committee.

This governance structure enables continuous oversight of climate-related risks and supports adaptive decision-making, contributing to the ongoing resilience of NTT DATA, Inc.'s strategy and business model.

Opportunity

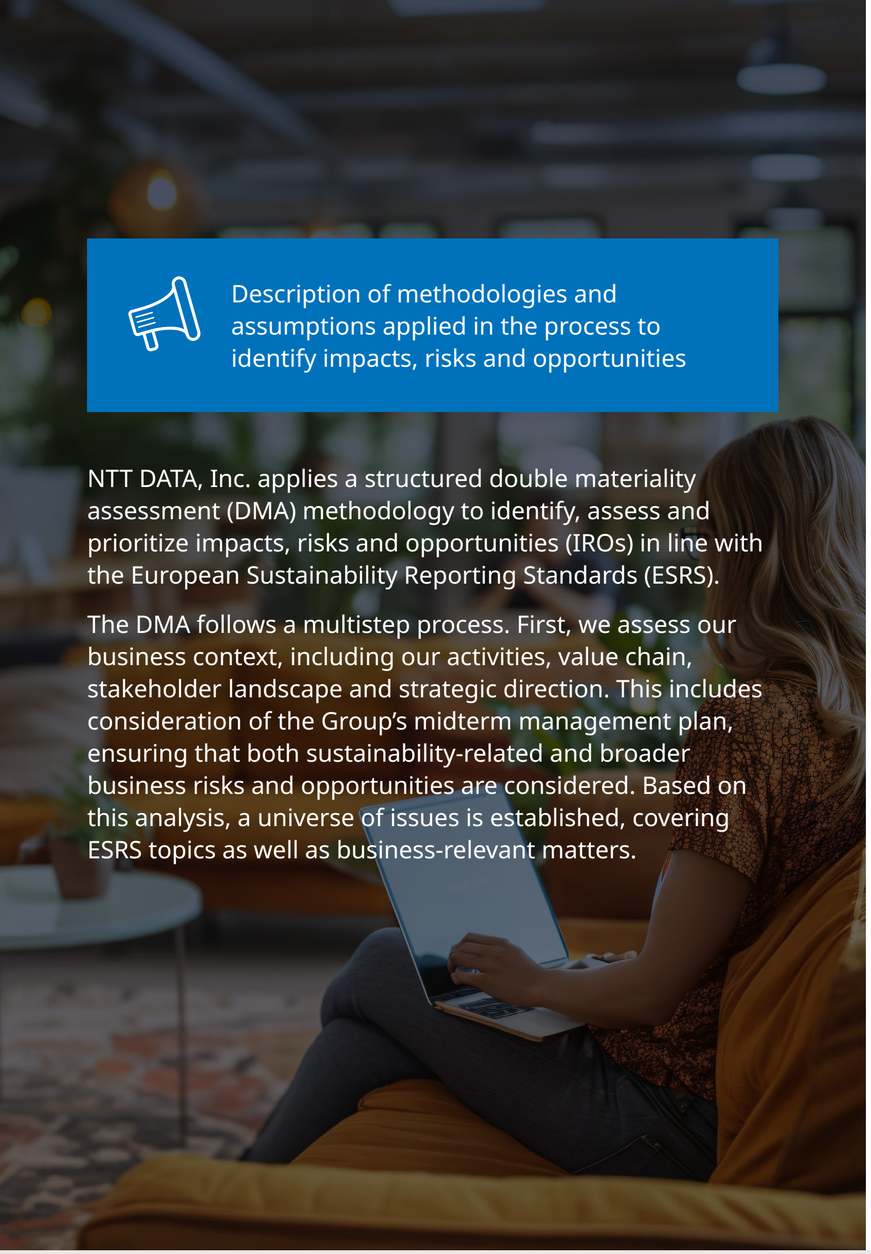
Our strategy and business model are positioned to capture sustainability-related opportunities arising from the transition to a low-carbon economy, particularly through increasing demand for decarbonization services, sustainability consulting and low-emission data center solutions. In addition, the growing adoption of digital technologies, including artificial intelligence (AI), presents further opportunities to enhance operational efficiency, optimize resource use and support clients in achieving their sustainability objectives. Resilience is supported by a diversified service portfolio and an ability to adapt to evolving regulatory and market conditions, enabling us to scale our offerings.

Impact

We strengthen our resilience to climate-related impacts through operational and organizational measures that support business continuity. These include employee training and upskilling, health and safety policies, and robust data center design with redundancy features. Regular testing and maintenance of backup systems, together with enhanced incident and crisis management processes, help minimize disruptions, health and safety risks, and dependencies on critical suppliers.

In parallel, we monitor and adapt to evolving regulatory requirements and stakeholder expectations related to climate change. We advance our transition efforts through the implementation of our science-based net-zero targets, transparent disclosure of progress, and the expansion of renewable and low-carbon energy procurement.

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Description of methodologies and assumptions applied in the process to identify impacts, risks and opportunities

NTT DATA, Inc. applies a structured double materiality assessment (DMA) methodology to identify, assess and prioritize impacts, risks and opportunities (IROs) in line with the European Sustainability Reporting Standards (ESRS).

The DMA follows a multistep process. First, we assess our business context, including our activities, value chain, stakeholder landscape and strategic direction. This includes consideration of the Group's midterm management plan, ensuring that both sustainability-related and broader business risks and opportunities are considered. Based on this analysis, a universe of issues is established, covering ESRS topics as well as business-relevant matters.

Impacts, risks and opportunities

Impacts, risks and opportunities are then identified throughout our own operations as well as across our upstream and downstream value chain. The identification process considers both sustainability-specific factors and broader business drivers, including market developments, regulatory trends and technological changes.

The assessment of impacts is based on severity, considering scale, scope and irremediability, and, for potential impacts, their likelihood of occurrence. Risks and opportunities are assessed based on the combination of their likelihood and the magnitude of their potential financial effects. These criteria are applied through a structured scoring methodology, enabling the prioritization of IROs across different sustainability and business topics.

The assessment process involves relevant internal stakeholders across business functions, business units and geographies. Evaluations are conducted through structured questionnaires, workshops and expert input. This ensures that both operational and strategic perspectives are reflected in the assessment.

The methodology is based on several key assumptions.

These include:

- Defined time horizons reflecting when impacts, risks and opportunities may occur
- A forward-looking perspective aligned with ESRS requirements
- The application of internally defined materiality thresholds

These thresholds are informed by external guidance, including EFRAG recommendations, and calibrated to reflect our risk management practices and stakeholder expectations.

Materiality is determined by combining impact and financial materiality assessments. For impacts, scores are derived from the combination of severity and likelihood. For risks and opportunities, scores are based on financial impact and likelihood. Thresholds are applied to identify material IROs, and the highest-scoring IROs for each topic are used to determine material topics.

The results of the DMA are consolidated and validated through internal processes, including review by management and consideration of external expert input, to ensure robustness and consistency.

Based on this process, 13 material topics were identified and formally approved by the Board of Directors of NTT DATA Group in June 2025, reflecting the integration of sustainability and business considerations into the Group's midterm management plan.

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[ESRS 2 SBM-2, IRO-2, G1.GOV-1]

Governance

[G1-MDR-P]

Policies in place to manage material impacts, risks and opportunities related to business conduct and corporate culture

Description of the key contents of the policy, including its general objectives and the material impacts, risks or opportunities it relates to, and, if there have been changes to the policies adopted during the reporting period, a description of those changes

NTT DATA, Inc. manages material impacts, risks and opportunities related to business conduct and corporate culture through its Code of Business Ethics (“the Code”), which defines the principles, standards and behaviors expected across the Group. The Code is approved by the Board of Directors and is a core element of NTT DATA’s governance and ethical framework.

→ Code of Business Ethics

The objectives of the Code are to:

- Embed a strong culture of integrity, accountability and responsible decision-making, aligned with NTT DATA’s mission, values, culture and philosophy
- Promote lawful, fair and transparent business conduct in all activities
- Prevent, mitigate and manage risks related to unethical behavior, corruption, conflicts of interest, unfair competition, data misuse, human rights impacts and the improper use of technology
- Strengthen long-term value creation by fostering trust with employees, clients, business partners and society

The Code addresses material impacts, risks and opportunities associated with business conduct and corporate culture, including:

- Ethical leadership and tone from the top
- Antibribery, corruption prevention and fair competition
- Respect for human rights and decent working conditions
- Ethical and sustainable supply chain practices
- Protection of confidential information, data privacy and intellectual property
- Responsible and ethical design and use of technology, including AI
- Confidential SpeakUp and Whistleblowing mechanisms to protect against retaliation

During the reporting period, the Code of Business Ethics was significantly updated with a greater focus on sustainability. It was approved in June 2025, reinforcing our commitment to responsible innovation, sustainability and consistent ethical standards across its global operations. It is reviewed annually.

Description of the scope of the policy, or of its exclusions, in terms of our own operations, upstream or downstream value chain and geographies and, if defined, the affected stakeholder groups

The Code of Business Ethics applies to **all directors, officers and employees** of NTT DATA Group Corporation and its consolidated subsidiaries worldwide, covering all geographies in which the Group operates.

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The Code applies to both our own operations and our upstream and downstream value chain:

- **Own operations**
  Ethical principles are embedded into governance structures, management decisions, operational processes and day to day activities across all business functions.
- **Upstream and downstream value chain**
  We expect suppliers, contractors and other business partners to act in accordance with the principles of the Code when working with or on behalf of the Group. Ethical expectations are integrated into supplier selection, onboarding, due diligence and ongoing engagement.

The Code applies to key affected stakeholder groups, including:

- Employees and directors
- Clients and end users
- Suppliers and other business partners
- Regulators, investors and local communities

No material exclusions are defined, as the Code is intended to provide a **uniform ethical standard** across all operations and relationships.



If the policy refers to third-party standards or initiatives that we commit to respect through the implementation of the policy, a reference to the third-party standard or initiative in question.

The Code of Business Ethics is aligned with internationally recognized principles and frameworks for responsible business conduct. Through its implementation, we commit to respecting and upholding the principles of:

- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, supporting responsible business conduct across global operations and value chains
- The United Nations (UN) Guiding Principles on Business and Human Rights, including respect for human rights, due diligence processes and remediation of adverse impacts

This alignment ensures consistency with global expectations on ethical conduct, governance and corporate responsibility, and supports our contribution to sustainable and responsible business practices worldwide.



Information about the process to identify actual and potential business conduct-related impacts, risks and opportunities

We apply consistent criteria to identify and assess impacts, risks and opportunities (IROs) through our double materiality assessment, in line with the ESRS.

These criteria include:

- **Geographical scope**
  Covering NTT DATA's global operations, taking into account regional regulatory and market conditions
- **Business activities and sector characteristics**
  Reflecting NTT DATA's core IT services and the specific characteristics of the digital and technology sector
- **Value chain structure**
  Considering impacts, risks and opportunities across own operations and, where relevant, the upstream and downstream value chain
- **Business conduct and governance**
  Considering, as part of the assessment, risks and impacts primarily related to our own operations, including ethical conduct, compliance, anticorruption and responsible business practices, considering the Code of Business Ethics and ongoing discussions with the Group governance department.

These criteria are applied through a structured assessment approach to ensure that IROs are identified and evaluated in a consistent manner across the Group.

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Risk management of and internal controls for sustainability reporting

NTT DATA, Inc. is establishing a robust governance-led framework to support effective risk management and internal controls for sustainability disclosure, in line with CSRD and ESRS requirements. In FY25, the focus was on building strong foundations through governance structures, program oversight, data governance and enabling processes that support transparent, reliable and decision-useful sustainability disclosures.

The scope of sustainability-related risk management and internal controls currently covers governance oversight, program and project management, data governance and readiness activities in relevant functions and regions. This includes oversight of sustainability reporting preparation, alignment with ESRS requirements, and the progressive integration of sustainability considerations into wider processes such as risk management, procurement and training.

Key features of the control environment include:

- Governance and oversight through established corporate governance structures
- Program and project management controls to support coordinated delivery
- Progressive integration of sustainability-related impacts, risks and opportunities into enterprise risk management
- Strengthening sustainability data governance
- Increasing environmental, social and governance (ESG) integration in procurement and third-party due diligence
- Capability building through targeted training
- Monitoring and continuous improvement, supported by management review and internal audit insights

Together, these arrangements aim to establish a strong control environment and to provide a clear pathway for the continued enhancement of risk management and internal control processes for sustainability disclosure.

Description of how administrative, management and supervisory bodies are informed about views and interests of affected stakeholders with regard to sustainability-related impacts

We ensure that the views and interests of affected stakeholders are systematically identified, considered and communicated to our administrative, management and supervisory bodies through our sustainability governance and double materiality assessment (DMA) process.

As part of the DMA, we have established a structured, Group-wide approach to understanding stakeholder perspectives of sustainability-related impacts, risks and opportunities. Key stakeholder groups considered include employees, clients, suppliers, regulatory authorities, local communities, the public, and industry associations. This identification is informed by internal documentation, prior materiality analyses, peer benchmarking, and alignment with international frameworks such as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Stakeholder views and interests are gathered through a combination of internal interviews, questionnaires, and engagement with relevant functions in our regions and business units. These inputs enable us to understand both actively expressed views and the perspectives of “silent stakeholders” whose interests may not be directly voiced but are relevant to long-term sustainability outcomes.

The results of the assessment, including identified impacts, risks and opportunities and their prioritization, are consolidated and reviewed in collaboration with the Group. Outcomes of the DMA, including material topics and related stakeholder considerations, are presented to senior management and discussed with executive management and supervisory bodies as part of strategic decision-making and governance oversight.

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To enhance objectivity and external credibility, external expert perspectives are also incorporated, as follows:

- **John Elkington,** a world authority on corporate responsibility and sustainable development, provides advice from the perspective of the “triple bottom line” with a focus on balancing environmental, social and economic value in sustainability strategies
- **Peter David Pedersen,** Chief Executive of E-Square Inc., one of Japan’s leading sustainability consultancies and a member of our advisory board, provides insights into sustainability strategy, stakeholder expectations and long-term value creation.
- **Forum for the Future,** an international sustainability organization working with business, government and civil society to accelerate the transition to a sustainable future, provides perspectives on global sustainability challenges and systemic risks

Through this process, stakeholder views are embedded into sustainability governance. They inform strategic direction, risk management and disclosure, supporting informed oversight by administrative, management and supervisory bodies and reinforcing our commitment to responsible and inclusive decision-making.

Disclosure of list of data points that derive from other EU legislation and information on their location in the sustainability statement



Index of ESRS disclosures and mapping to other EU legislation

This sustainability statement is aligned with the European Sustainability Reporting Standards (ESRS) set out in Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023.

A comprehensive ESRS disclosure index and related framework mappings are provided in **Annexure B: Index tables,** which should be read for full traceability across the sustainability statement.

The tables provide an overview of the ESRS Disclosure Requirements addressed in this sustainability statement, together with their location in the report.

In addition, in accordance with ESRS 1 paragraph 56, they include a mapping of disclosures derived from other EU legislation, including NFRD 11/2018, indicating where the relevant information is presented in this sustainability statement.

The tables are structured primarily based on ESRS Disclosure Requirements, with references to corresponding NFRD requirements where applicable.

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Disclosure of the role of administrative, management and supervisory bodies related to business conduct

NTT DATA, Inc.’s administrative, management and supervisory bodies play a critical role in promoting, overseeing and embedding high standards of business conduct across the Group. These standards are anchored in the Code of Business Ethics, approved by the Board of Directors and applicable globally to directors, officers, employees and subsidiaries.

The Board of Directors provides overall oversight by approving the Code and ensuring alignment with the Group’s values, mission, and commitment to integrity, transparency and responsible innovation.

Senior management is responsible for implementing these principles by integrating them into strategy, decision-making and operations, setting a strong tone from the top.

Administrative and management bodies establish clear governance structures, delegated authorities and internal controls to ensure the consistent application of ethical standards and compliance with applicable laws, regulations and internal policies across all markets.

Supervisory functions, including audit and compliance bodies, monitor adherence to the Code through periodic reporting, internal and external audits and compliance reviews. These mechanisms support transparency, risk management and continuous improvement.

Governance bodies also foster a culture of integrity through mandatory training, annual acknowledgments and confidential speak-up channels that enable the timely identification and resolution of concerns.

Through these coordinated roles, we ensure that responsible business conduct is embedded across our operations, supporting sustainable value creation and stakeholder trust.

Disclosure of the expertise of administrative, management and supervisory bodies on business conduct matters

NTT DATA, Inc.’s administrative, management and supervisory bodies collectively possess appropriate expertise to oversee business conduct matters. This includes competencies in ethics, compliance, corporate governance, risk management, and applicable legal and regulatory frameworks.

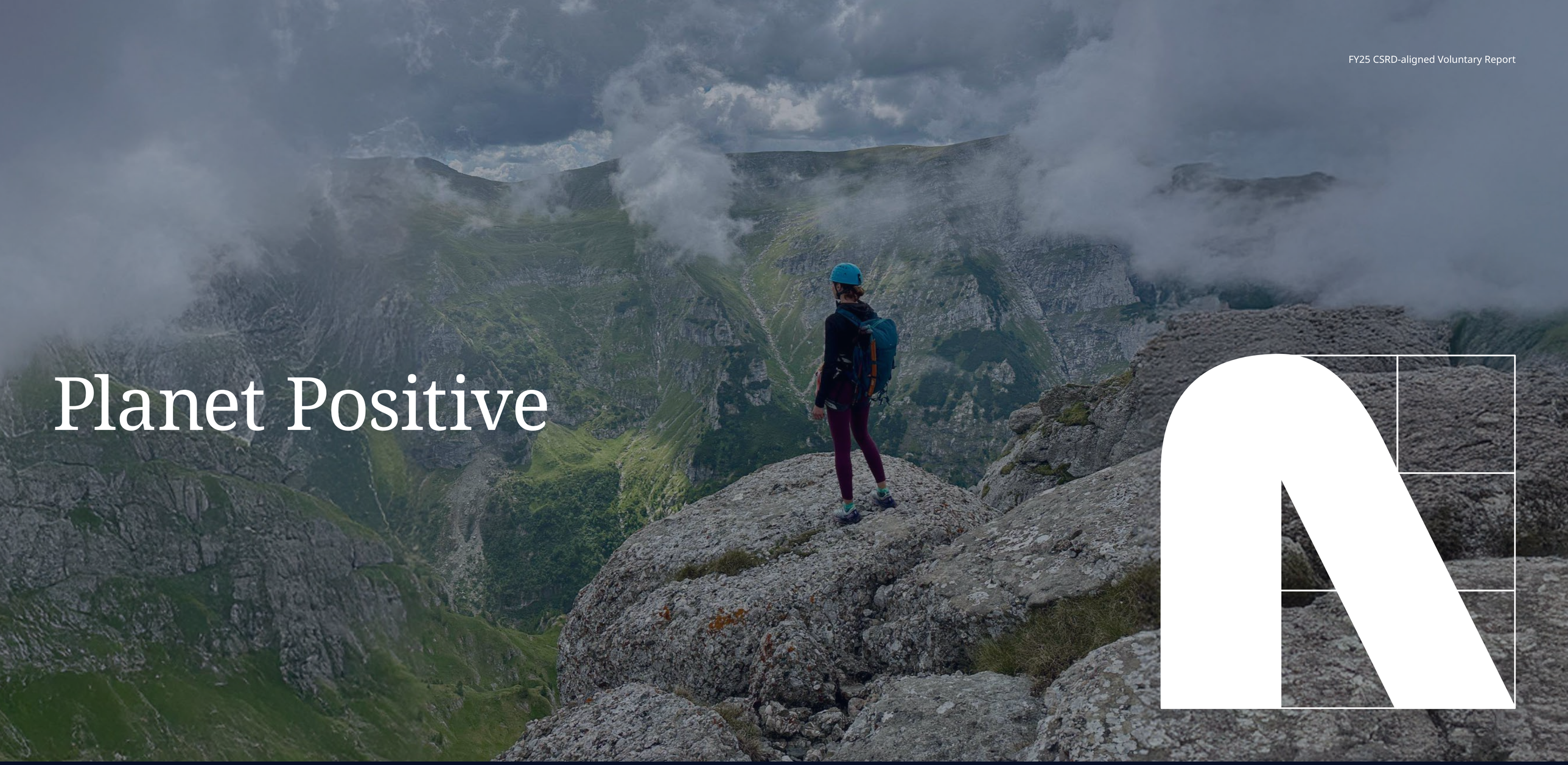
This expertise is supported by the Code of Business Ethics, which provides a comprehensive framework for ethical decision-making, responsible business practices and compliance across global operations.

Members of these bodies bring experience in oversight, internal controls, and audit and compliance functions, enabling them to identify and manage risks relating to business conduct, ensure accurate and transparent reporting, and uphold high standards of integrity. Their expertise is continuously strengthened through mandatory training programs, compliance initiatives, and regular monitoring and review processes. These ensure that governance bodies remain informed of evolving regulatory requirements and emerging ethical risks.

Structured processes, including audits, compliance reviews and reporting mechanisms, further support informed decision-making and effective oversight. Together, this combination of expertise, governance frameworks and continuous capability development enables NTT DATA, Inc. to maintain robust oversight of business conduct, aligned with its commitment to responsible innovation and sustainable business practices.

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Planet Positive



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Introduction to Planet Positive

Materiality	Indicators
Climate Change	Greenhouse gas (GHG) emissions
Circularity	1. Weight (in kilograms) of end-of-life corporate IT devices that are recycled or repurposed 2. Percentage of corporate IT devices reused, repaired or refurbished during their lifecycle
Water Management	Water usage effectiveness (WUE)

Lead by example to disrupt industries for good, innovating services and solutions to regenerate our planet.

Global environmental pressures ranging from climate change to resource scarcity and water insecurity require coordinated, technology-enabled solutions. As a global business and technology services leader, we are uniquely positioned to both minimize our own impact and enable our clients to transition toward more sustainable, regenerative models.

This chapter details our commitments and actions on three material topics:

1. Climate Change
2. Circularity
3. Water Management

1.1. Climate Change

This material topic recognizes the importance of climate action in our own operations and in the solutions we provide to clients. Our approach combines emissions reduction, climate risk management and the development of services that enable the transition to a low-carbon economy.

As decarbonization efforts in the world progress, we are working to reduce greenhouse gas (GHG) emissions throughout our operations and value chain. We also aim to support our clients in reducing their GHG emissions through our innovative solutions.

1.1.1. Policy

[E1 MDR-P, E1-2]

NTT DATA, Inc. implements the NTT DATA Environmental Policy, which provides the overarching framework for managing material impacts, risks and opportunities related to climate change mitigation and adaptation. This policy applies globally across NTT DATA Group Corporation and its consolidated subsidiaries, including NTT DATA, Inc.

In line with this policy, NTT DATA Group has established NTT DATA Net-Zero Vision 2040, a plan for achieving net-zero GHG emissions across Scope 1, Scope 2 and Scope 3 by 2040. This target applies to the Group's global operations and value chain and is supported by interim milestones.

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The Environmental Policy explicitly identifies climate change as a key priority area, stating:

- To mitigate climate change, we will reduce greenhouse gas emissions. We aim for net-zero greenhouse gases across the entire supply chain under our NTT DATA Net-Zero Vision 2040.
- We will provide solutions that contribute to addressing climate change.

These commitments demonstrate the Group's approach to climate change mitigation through both emissions reduction across its value chain and the provision of services that support decarbonization.

The full environmental policy, including the climate change commitments, is available at:

→ Environmental Policy

We address climate change adaptation through climate-related risks and opportunities through an environmental management framework and broader sustainability initiatives, including consideration of physical climate risks such as extreme weather events, particularly in relation to critical infrastructure and service continuity.

Governance of climate-related policies and initiatives is overseen at Group level through the Sustainability Committee, under the supervision of the Board of Directors, ensuring alignment of climate-related actions with overall business strategy.

Through these policies and commitments, we manage our material climate-related impacts, risks and opportunities in alignment with global climate goals, including the Paris Agreement.

1.1.2. Targets and KPI framework

[E1 MDR-T, E1-4]

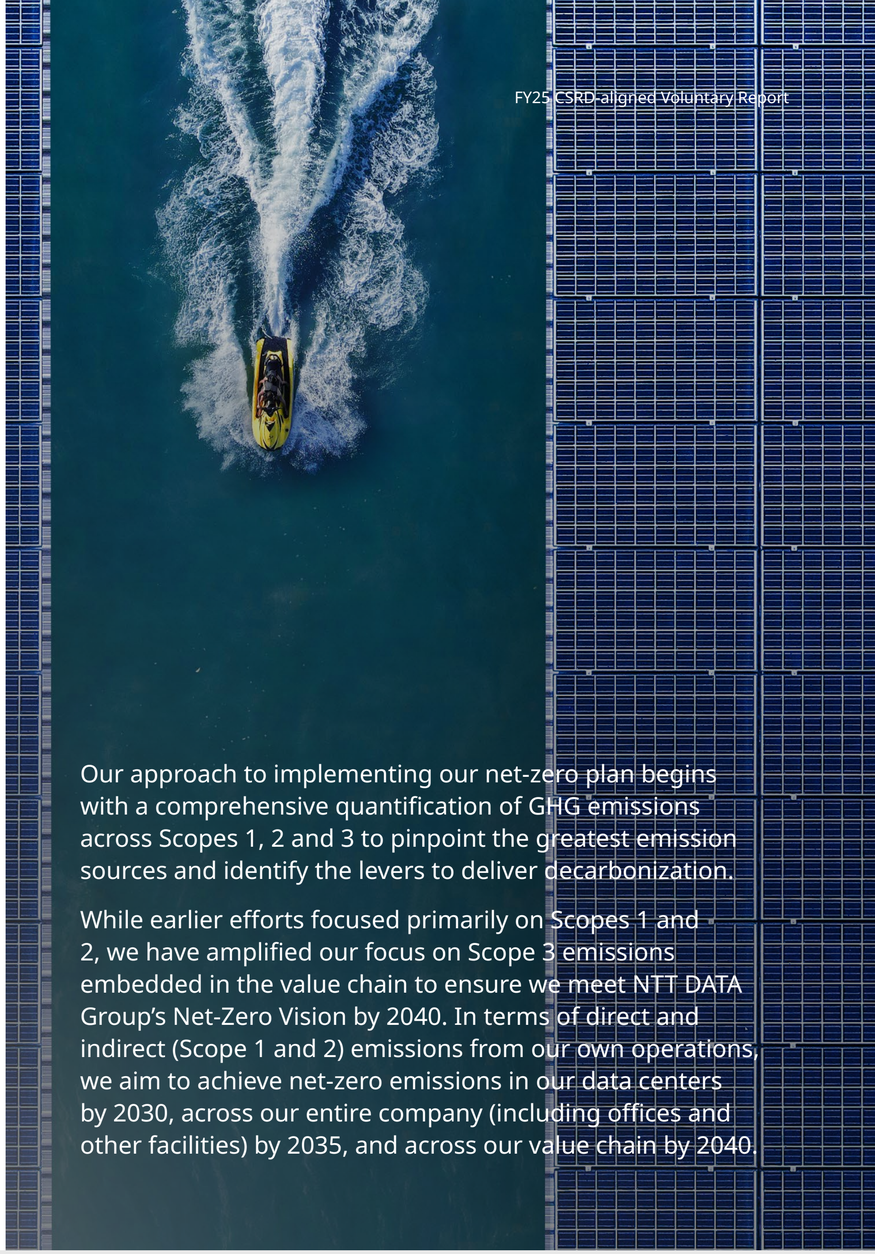
NTT DATA, Inc. is a wholly-owned subsidiary of NTT DATA Group and is covered by the Group's SBTi-approved science-based targets and net-zero commitment across the value chain by FY40. The Group's targets are aligned to a 1.5-degree pathway under the SBTi Corporate Net-Zero Standard and are the primary climate targets applied by NTT DATA, Inc.

Formal targets

Base year: FY21*

Near term	Long term	Overall net-zero target
Reduce absolute Scope 1 and 2 emissions by 68% by FY30.	Reduce absolute Scope 1 and 2 emissions by 90% by FY35.	Reach net-zero greenhouse gas emissions across the value chain by FY40.
Reduce absolute Scope 3 emissions by 42% by FY30.	Reduce absolute Scope 3 emissions by 90% by FY40.	

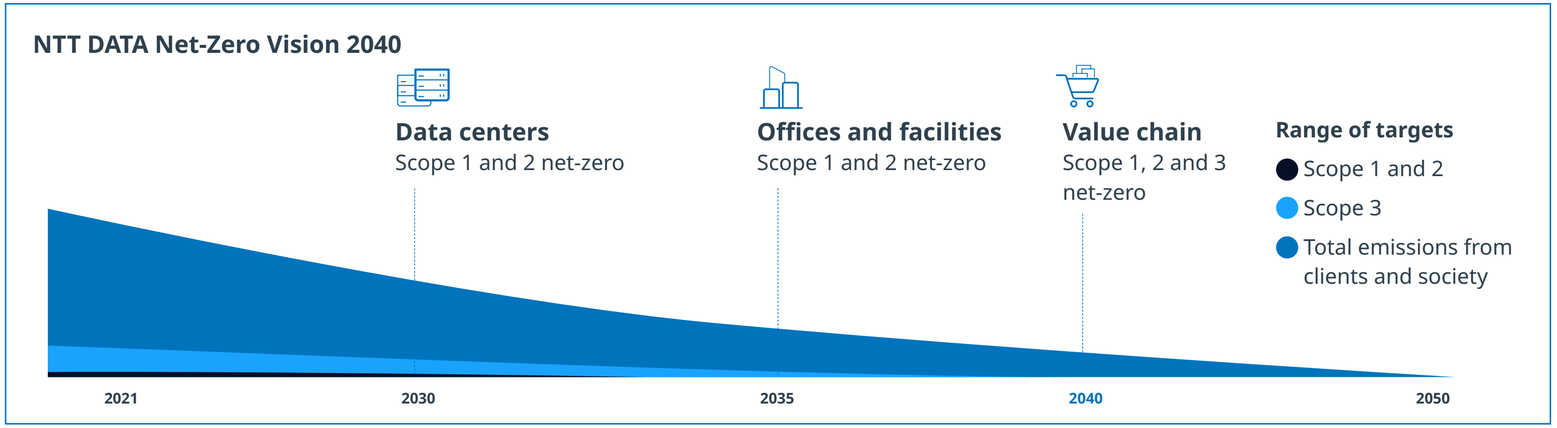
*The FY21 base year of NTT DATA's currently validated science-based target remains unchanged. While historical emissions data may be restated to reflect material organizational, methodological or data-quality changes in accordance with the Group's recalculation policy, any change to the target base year would occur only through a formal target review or revalidation process. NTT DATA expects to assess future base-year requirements as part of the next SBTi target cycle.



Our approach to implementing our net-zero plan begins with a comprehensive quantification of GHG emissions across Scopes 1, 2 and 3 to pinpoint the greatest emission sources and identify the levers to deliver decarbonization.

While earlier efforts focused primarily on Scopes 1 and 2, we have amplified our focus on Scope 3 emissions embedded in the value chain to ensure we meet NTT DATA Group's Net-Zero Vision by 2040. In terms of direct and indirect (Scope 1 and 2) emissions from our own operations, we aim to achieve net-zero emissions in our data centers by 2030, across our entire company (including offices and other facilities) by 2035, and across our value chain by 2040.

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1.1.3. Actions

[E1 MDR-A, E1-3]

This section describes the key actions taken in FY25 that support our decarbonization pathway to achieve net-zero in the value chain by 2040 (SBTi-validated target).

The scope of those actions is as defined in the boundary of control document and covers NTT DATA, Inc.'s operations and value chain. The time horizon is from current year until the net-zero target year 2040.

Main levers for decarbonization in our operations

Investment in renewable and low-carbon electricity

Continued and increasing investment in renewable and low-carbon electricity for our data centers and facilities includes:

- Capital investments in onsite generation and off-site power purchase agreements (PPAs)
- Operational expenditure in procurement of renewable energy attribute certificates (EACs)
- Selection of electricity suppliers and tariffs with higher percentage of renewable and low-carbon electricity

In FY25, we purchased 1,084,563MWh of renewable electricity, achieving 65% renewable electricity of all purchased electricity, up from 59% in FY24.

Consolidation and increased energy efficiency in offices and warehouses

We continued to increase the utilization of working space, due to our hybrid work culture, and increased energy efficiency in our offices and warehouses.

Corporate fleet

We further migrated our corporate fleet to low-carbon vehicles (electric and hybrid) and invested significant resources in building charging infrastructure that utilizes renewable and low-carbon electricity. This will result in gradually decreasing Scope 1 emissions without increasing our Scope 2 emissions.

These initiatives allowed us to reduce our Scope 1 and 2 emissions by 35.67kt CO_2e from FY24 and set us a year ahead in our SBTi-defined operational emissions-reduction pathway, with an increasing future-positive impact.

Main levers for decarbonization in our value chain

Sustainable procurement

We established a sustainable procurement center of excellence (CoE) and started a supplier engagement program with our top 70% of suppliers, determined by GHG emissions contribution.

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Embedded emissions

Together with our main suppliers, we are identifying initiatives to address emissions embedded in the manufacturing, transportation and use of IT hardware by integrating transparent impact measurement, data sharing, energy efficiency and circularity in our ways of working and client engagement approach.

Client solutions

We have developed solutions to help clients purchase and configure less-carbon-intensive IT hardware and measure its energy consumption and emissions in real time. This proactively identifies improvements and avoids unnecessary emissions.

Our intention with these initiatives is to positively impact and support our net-zero aim in our value chain by 2040.

[E1-5]

Energy consumption and mix

Table 3 Energy consumption and mix

Energy consumption and mix	Value
(1) Fuel consumption from coal and coal products (MWh)	0
(2) Fuel consumption from crude oil and petroleum products (MWh)	113,789
(3) Fuel consumption from natural gas (MWh)	11,217
(4) Fuel consumption from other fossil sources (MWh)	0
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	468,672
(6) Total fossil energy consumption (MWh)	593,678
Share of fossil sources in total energy consumption (%)	35%
(7) Consumption from nuclear sources (MWh)	n/a
Share of consumption from nuclear sources in total energy consumption (%)	n/a
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	925
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1,081,655
(10) The consumption of self-generated non-fuel renewable energy (MWh)	1,983
(11) Total renewable energy consumption (MWh)	1,084,563
Share of renewable sources in total energy consumption (%)	65%
Total energy consumption (MWh)	1,678,241

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1.1.4. Greenhouse gas (GHG) emissions

[E1-6]

Table 4: Greenhouse gas emissions, FY24 to FY25

Indicator	FY24 (metric tonnes CO_2e)	FY25 (metric tonnes CO_2e)	Absolute reduction (metric tonnes CO_2e)
Scope 1 GHG emissions	43,689.70	42,380.38	-1,309.32
Scope 2 GHG emissions (market-based)	253,591.76	219,235.79	-34,355.97
Scope 2 GHG emissions (location-based)	582,429.86	742,425.22	+159,995.36
Scope 3 GHG emissions Category 1: Purchased goods and services	1,187,146.71	1,474,170.94	+287,024.23
Scope 3 GHG emissions Category 2: Capital goods	424,297.19	165,651.46	-258,645.73
Scope 3 GHG emissions Category 3: Fuel and energy-related activities (not included in Scope 1 or 2)	219,184.82	225,564.85	+6,380.03
Scope 3 GHG emissions Category 4: Upstream transportation and distribution	27,611.18	31,794.41	+4,183.23
Scope 3 GHG emissions Category 5: Waste generated in operations	N/A	N/A	
Scope 3 GHG emissions Category 6: Business travel	83,568.91	29,702.56	-53,866.35
Scope 3 GHG emissions Category 7: Employee commuting	29,018.77	125,615.34	+96,596.57
Scope 3 GHG emissions Category 8: Upstream leased assets	N/A	N/A	
Scope 3 GHG emissions Category 9: Downstream transportation and distribution	279.75	1,062.08	+782.33

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Indicator	FY24 (metric tonnes CO_2e)	FY25 (metric tonnes CO_2e)	Absolute reduction (metric tonnes CO_2e)
Scope 3 GHG emissions Category 10: Processing of sold products	N/A		
Scope 3 GHG emissions Category 11: Use of sold products	1,225,122.54	2,132,135.76	+907,013.22
Scope 3 GHG emissions Category 12: End-of-life treatment of sold products	2,224.62	4,079.27	+1,854.65
Scope 3 GHG emissions Category 13: Downstream leased assets	803,226.79	982,296.34	+179,069.55
Scope 3 GHG emissions Category 14: Franchises	N/A		
Scope 3 GHG emissions Category 15: Investments	11,761.14	46,663.72	+34,902.58
Scope 3 GHG emissions (Total)	4,013,442.42	5,218,736.72	+1,205,294.30
Total GHG emissions (market-based)	4,310,723.88	5,480,352.90	+1,169,629.02
Total GHG emissions (location-based)	4,639,561.98	6,590,537.03	+1,950,975.05

Notes:

Scope 1 covers all direct emissions from our business operations, across all sites.

Scope 2 covers all direct emissions associated with our electricity and heat consumption, across all sites.

Scope 2 (location-based) and Scope 2 (market-based) are defined in the World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) GHG Protocol Scope 2 Guidance, 2015.

Scope 3 categories such as Category 8 (Upstream leased assets), Category 10 (Processing of sold products) and Category 14 (Franchises) were excluded as they are not applicable to NTT DATA, Inc.

In Scope 3, there have been changes in the calculation methodology that affect the comparison between FY24 and FY25.

Gross GHG emissions are reported on the basis of financial control and expressed in carbon dioxide equivalent (CO_2e).

Historical emissions may be recalculated in accordance with NTT DATA's recalculation policy where required. Such recalculations would not alter the FY21 base year of NTT DATA's currently validated science-based target unless a formal target review or revalidation process is undertaken.

→ Further detail on organizational boundary, assumptions, methodology, comparability and assurance is provided in **Section 1.1.5: Greenhouse gas (GHG): Reporting methodology, assumptions and assurance [E1-6 MDR-M]**

→ FY25 NTT DATA, Inc. GHG emissions methodology and basis of reporting

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1.1.5. Greenhouse gas (GHG): Reporting methodology, assumptions and assurance

[E1-6 MDR-M]

NTT DATA Inc GHG basis of Reporting contains the GHG methodology and assumptions aligned to the The GHG Protocol Corporate Accounting and Reporting Standard

→ Basis of Reporting

The FY21 base year of NTT DATA's currently validated science-based target remains unchanged. While historical emissions data may be restated to reflect material organizational, methodological or data-quality changes in accordance with the Group's recalculation policy, any change to the target base year would occur only through a formal target review or revalidation process. NTT DATA expects to assess future base-year requirements as part of the next SBTi target cycle.

1.1.6. Greenhouse Gas (GHG) reporting improvements

To continuously improve the quality of emissions estimates we work with suppliers and partners to obtain more accurate and actionable data sources like manufacturer specific product carbon footprint, or CDP supplier specific emission factors. When that is not possible, we utilize data sources based on product categories average emission factors and aim to reduce the use of purely spend based categories average factors. Scientific uncertainty and model uncertainty are beyond the scope of our inventory efforts.

As part of our sustainability program, we plan to address any data gaps by engaging with our supply chain to gather supplier specific emission factors. This year we have improved the data collection and emissions calculation through implementing an automated internal reporting platform to collect and validate all emissions related data.

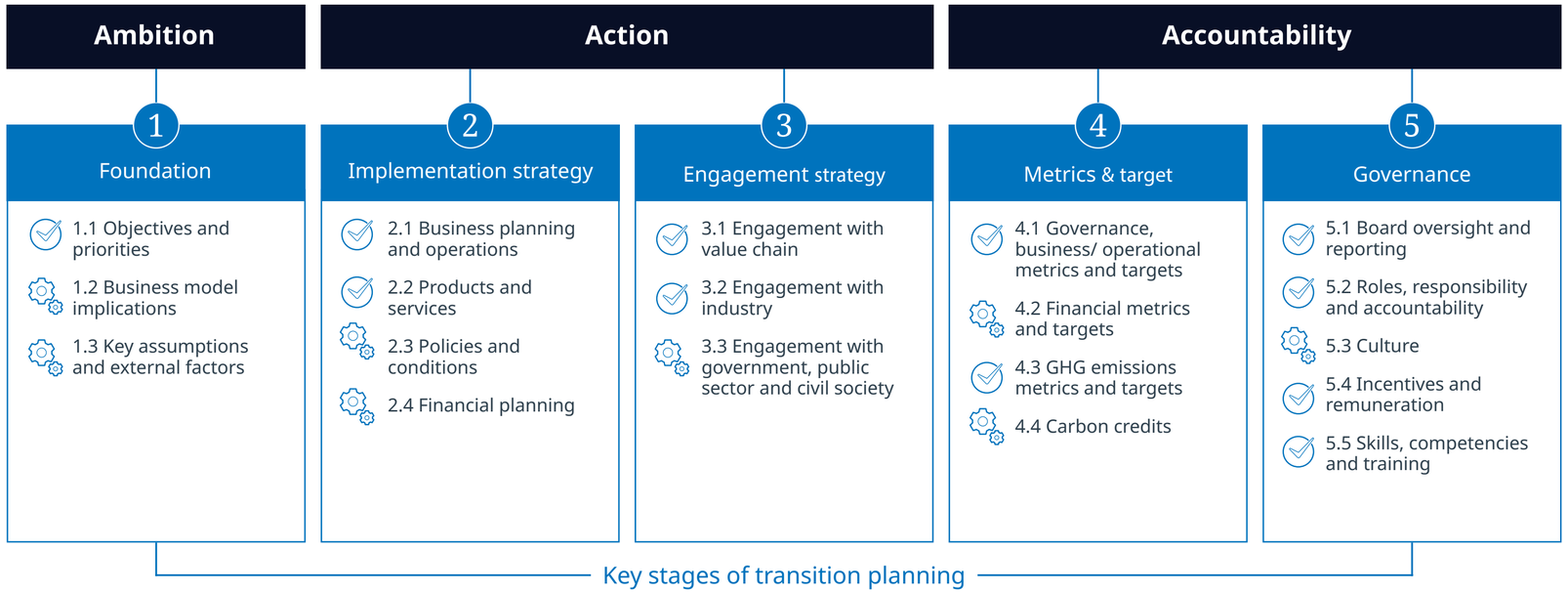
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[E1-1]

Climate Transition Plan

Our Climate Transition Plan is informed by the Transition Plan Taskforce (TPT) guidance and framework. It sets out the strategic approach through which we intend to achieve our climate ambition, in a structured and credible manner. It outlines the foundations of the transition, including strategic ambition, implementation priorities, engagement across the value chain and wider ecosystem, and the metrics and targets used to monitor progress. Together, these elements are intended to provide a clear and coherent view of how climate considerations are being embedded into business planning, operational decision-making and long-term resilience.

→ For a detailed mapping of ESRS disclosure requirements and their location in this report, including data points related to the Climate Transition Plan, refer to Annexure B: Index tables.



Strategic ambition (objectives and priorities)

Strategic ambition and climate objective (TPT A1)

Our Climate Transition Plan is anchored in the Group's SBTi-approved net-zero ambition and interim milestones. In the context of the Climate Transition Plan, this ambition is considered in strategic terms, focusing on how the business model, implementation priorities, engagement activities and governance arrangements support delivery of those targets over time.

→ Formal targets

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Material climate impacts and dependencies (TPT A2)

Key impacts

NTT DATA, Inc.'s most material climate impacts arise from:

- Electricity consumption in global data centers and offices (Scope 2)
- Upstream value chain emissions embedded in IT hardware, capital goods and supplier energy use (Scope 3, Categories 1 and 2)
- Downstream emissions from the use of sold and leased IT infrastructure by clients (Scope 3, Categories 11 and 13)

In FY25, Scope 3 emissions represented approximately 95% of total GHG emissions, underscoring the significance of value chain transformation to achieving net-zero.

Critical dependencies and sensitivities

Progress against the transition plan is materially dependent on external system conditions.

Key dependencies and sensitivities include:

Electricity grid decarbonization

- The potential for Scope 2 abatement is contingent on access to renewable or low carbon electricity in the markets where NTT DATA, Inc. builds and operates data centers.
- A shortfall in the availability of renewable electricity in priority markets by 2030 would delay achieving net-zero Scope 2 emissions from data centers, assuming there are no compensatory efficiency gains.

Energy efficiency trajectory in data centers

Maintaining average power-usage effectiveness (PUE) and systems efficiency improvements consistent with our current performance and plans avoids increases in absolute electricity demand created by the growth of AI driven load.

Supplier decarbonization

- Purchased goods, services and capital goods account for over 31% of total Scope 3 emissions.
- Achieving the 2040 Scope 3 reduction pathway assumes that a majority of strategic suppliers set and implement SBTi aligned targets this decade.
- If supplier engagement and alignment on science-based net-zero ambition stalls below ~70% coverage by emissions, Scope 3 abatement would increasingly rely on structural demand-reduction and design choices.

These dependencies and sensitivities are monitored through scenario analysis and supplier engagement programs.



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Strategic trade offs and mitigation choices (TPT A3)

This Climate Transition Plan identifies trade offs between business growth and emissions reduction, particularly in relation to cloud expansion and AI enabled services.

Key trade-offs include:

Growth versus absolute emissions

Demand for high density compute may increase absolute electricity consumption, even as carbon intensity falls.

Strategic response: Prioritization of low carbon capacity expansion and workload optimization, and divestment or avoidance of structurally high carbon locations.

Capital intensity versus long term resilience

Renewable PPAs, on site generation and advanced cooling require higher up-front capital and long term contractual commitments.

Strategic response: Integration of decarbonization investments into medium term financial planning and asset lifecycle decisions.

Geographic flexibility versus emissions performance

Some markets offer lower cost or greater proximity to clients but have limited clean energy availability.

Strategic response: Selective market participation and workload migration where climate alignment cannot be achieved within acceptable timeframes.

These trade offs are assessed through investment governance processes and carbon reduction prioritization frameworks.

Alignment with stakeholders and external requirements (TPT A4)

NTT DATA, Inc.’s strategic ambition is aligned with:

- **Clients,** whose own responses to physical and transitional climate change risks increasingly require credible net zero alignment and low carbon digital solutions and services
- **Employees,** for many of whom sustainability is central to engagement and talent retention
- **Investors and lenders,** who expect decision useful transition plans and climate risk disclosure
- **Regulatory frameworks,** including CSRD, ESRS E1 and ESRS aligned risk management

This Climate Transition Plan supports our objectives to increase transparency, disclosure and due diligence while reinforcing trust with clients and partners.

GHG results and decarbonization levers

Our GHG performance and identified decarbonization levers are addressed in Sections 1.1.4 and 1.1.5.

→ 1.1.4: Greenhouse Gas (GHG) emissions [E1-6]

→ 1.1.5: Greenhouse Gas (GHG): Reporting methodology, assumptions and assurance [E1-6 MDR-M]



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A just transition means moving to a low carbon economy in a way that is fair and inclusive, ensuring workers and communities are supported and no one is left behind.

Examples of our company's approach to just transition to renewable and low carbon energy

We are committed to delivering our energy transition in a way that is fair, inclusive, and attentive to real-world impacts on people and communities, balancing our business growth with just energy transition towards clean energy. As we improve energy efficiency, electrify our corporate car fleet and expand renewable electricity procurement, we will seek to protect service reliability, support workforce capability and safety, engage suppliers responsibly, and consider affordability, local grid conditions and community outcomes in major energy-related decisions. Where possible, we will favor approaches that not only reduce emissions but also strengthen energy-system resilience, expand access to clean energy benefits and support a broader, more equitable low-carbon transition.

Examples of our approach to a just transition and its impact on local communities and digital accessibility

Our approach to digital accessibility is grounded in the principles of a just transition, ensuring that, as digital transformation accelerates, no communities or individuals are excluded because of disability, socioeconomic status, language or access barriers. We recognize digital access as a social enabler that supports equitable participation in education, employment, public services and civic life — particularly for vulnerable or marginalized groups.

Through our Digital Impact initiative, we aim to positively impact people in underserved communities through digital accessibility solutions and inclusion programs. We will focus on embedding accessibility into digital products, services and programs by design, supporting inclusive local ecosystems and reducing the risk of widening digital inequalities as part of broader climate and societal transitions.

Our digital accessibility efforts support a just transition at a community level by:

- Improving access to digital skills and tools for underserved groups, including persons with disabilities, older adults and low-income communities
- Enabling more inclusive participation in digital public services, employment pathways and climate-related programs
- Supporting local organizations and NGOs with accessible digital platforms, resources and capacity-building

These actions help ensure that the benefits of digitalization linked to climate transition (for example, digital services, smart infrastructure and remote access) are equitably distributed.

Examples of our approach to just transition in human rights, including policies, due-diligence processes and measurable indicators

Human rights due diligence (HRDD) and governance

- HRDD processes that identify, assess and prioritize human rights risks, including those in the supply chain and in higher-risk countries
- Action planning for mitigation and grievance-mechanism enhancement

Ethical and responsible technology commitments

The Code of Business Ethics references the responsible and ethical design and use of technology, including:

- Completing risk assessments when introducing new technology (including AI)
- Evaluating ethical considerations such as respect for human rights, fairness, inclusion and transparency

Speak-up and grievance mechanisms

- Workforce channels for raising concerns and protections against retaliation

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Nature-positive transition and ecosystem resilience

The Elephant Conservation Project, undertaken by NTT DATA in North America in partnership with the World Wildlife Fund (WWF), advances a scalable model for nature-positive impact by aligning biodiversity conservation with community resilience. Focused on a critical elephant corridor in India, the initiative integrates AI-enabled early-warning systems, movement tracking and data-led habitat management with community-based interventions and climate-resilient agriculture. This approach supports ecosystem restoration while strengthening livelihoods, contributing to global biodiversity priorities such as Sustainable Development Goal (SDG) 15: Life on land and SDG 11: Sustainable cities and communities.

The project has delivered measurable results, including:

- Training 1,600+ stakeholders
- Mobilizing 150+ community volunteers
- Tracking 50+ elephants
- Generating over 18,000 ecological data points to inform conservation planning.

AI-driven systems have issued over 650 alerts to mitigate human–wildlife conflict, while livelihood interventions have driven an 85% increase in crop yield for participating farmers — demonstrating the link between conservation and economic resilience.

Recognized with the Nature Positive Award at the 13th NTT Group Sustainability Conference, this initiative exemplifies how technology-enabled, partnership-led approaches can deliver scalable, nature-positive outcomes aligned to our ESG commitments.

Beyond these direct outcomes, the project establishes a replicable model for integrating technology, community engagement and conservation at scale. By strengthening collaboration between local communities, conservation partners and public stakeholders, it builds long-term capacity for adaptive ecosystem management and climate resilience. This reinforces our broader ESG strategy of leveraging innovation for social and environmental impact, demonstrating how corporate contributions can accelerate progress to nature-positive, inclusive growth.

Business model and value chain (business model implications)

(TPT B1)

The Climate Transition Plan considers the implications of climate-related risks and dependencies for our business model and value chain, including the concentration of emissions in energy use, infrastructure and the value chain, and the strategic importance of supplier decarbonization, low-carbon energy and resilient digital infrastructure. Detailed disclosure of physical and transition risks, scenario analysis and resilience is provided in the Climate-related Risks section.

→ Climate-related risks [E1.SBM-3, E1.IRO-1]

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Business model and emissions concentration (TPT B1)

Our business model spans emissions in these areas:

- **Upstream:** IT hardware manufacturing, data center construction, energy supply and professional services
- **Own operations:** offices, corporate fleet and global data center operations
- **Downstream:** client use of hosted, managed and sold IT infrastructure

Emissions are concentrated in:

- Upstream supply chain (purchases of IT hardware; capital investments in data center construction)
- Electricity use in data centers
- Downstream use of sold products, particularly digital infrastructure (IT hardware) with a long life

This profile requires a transition focused on system efficiency, clean energy and value chain engagement, rather than operational abatement alone.

Transition levers within the business model (TPT B2)

Our transition to a low carbon economy is driven by three integrated levers:

1. Decarbonizing own operations

- Expansion of renewable and low carbon electricity procurement (PPAs, EACs, on site generation, green tariffs selection)
- Continuous improvement in data center efficiency (cooling, power systems, load optimization)
- Office consolidation, hybrid working models and low carbon fleet transition

2. Transforming the value chain

- Supplier engagement covering over 70% of Scope 3 emissions by spend and GHG emissions
- Integration of climate criteria into procurement and capital allocation decisions
- Increased circularity of IT assets, reducing embodied-emissions intensity

3. Enabling client decarbonization

- Delivery of energy efficient cloud, connectivity and managed services
- Deployment of sustainability data, reporting and optimization solutions
- Use of NTT DATA, Inc. as “client zero” to validate and scale solutions

These levers are mutually reinforcing and central to long term value creation.

Transition risks and sensitivities (TPT B3)

Policy and regulatory risk

Increased reporting obligations, carbon pricing and energy regulation may raise compliance and operating costs.

Sensitivity: Higher electricity prices increase exposure to Scope 2 cost volatility, strengthening the business case for long term renewable contracts.

Market and client risk

Failure to deliver low carbon digital services could reduce competitiveness in regulated or sustainability driven sectors.

Sensitivity: Sustained client-preference shifts could reprice high carbon service offerings over the medium term.

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Technology risk

Dependence on efficiency and cooling innovations to mitigate AI driven demand growth.

Sensitivity: Delayed deployment of advanced cooling or power systems would increase emissions intensity and capital requirements.

Supply chain risk

Uneven supplier readiness and access to renewable energy across regions.

Sensitivity: Slower supplier decarbonization would increase reliance on demand side and design based abatement.

These risks are addressed through scenario analyses, procurement standards, and active engagement with suppliers and policymakers.

Long term resilience and strategic positioning (TPT B4)

By embedding our Climate Transition Plan into our core business strategy, we will position decarbonization as a source of resilience and competitive advantage, supporting:

- Reduced exposure to energy and carbon price volatility
- Enhanced operational resilience of digital infrastructure
- Growth in sustainability led digital and advisory services

This alignment ensures that the NTT DATA Net-Zero 2040 Vision supports both climate outcomes and long term business viability.

Key assumptions and external factors

Delivery of this transition plan depends on a number of assumptions and external factors, some of which are outside our direct control:

- Key assumptions include continued progress in data center energy efficiency, access to reliable emissions data, and the successful execution of our renewable electricity, car fleet electrification and supplier engagement programs.
- Key external factors include the pace of regional grid decarbonization, availability of clean power infrastructure for our data centers, supplier decarbonization and IT hardware circularity progress, availability of low-carbon construction materials, and customer demand patterns.

Its success is also dependent on evolving policy, regulatory and market conditions. Significant changes in these assumptions or external dependencies could affect the timing, cost and achievability of specific elements of the plan.

Implementation strategy

Business operations (business planning and operations)

Decarbonization across NTT DATA, Inc.

NTT DATA, Inc. is advancing its global decarbonization agenda through a coordinated and comprehensive approach that integrates energy transition, operational efficiency, sustainable mobility and circular economy principles.

These efforts are aligned with the Group's commitment and aim to achieve net-zero emissions across Scope 1 and Scope 2 by 2035, while progressively strengthening Scope 3 engagement. Across its global footprint, decarbonization is increasingly embedded into core business operations, supported by structured governance, targeted investments and regionally tailored initiatives.

A central pillar of this transition is the increasing adoption of renewable electricity.

Across multiple markets, we have accelerated the transition to renewable energy through mechanisms such as green tariffs and certified renewable energy procurement.

In several locations, operations are now fully powered by renewable electricity, contributing to significant reductions in Scope 2 emissions. This transition is complemented by on-site renewable energy generation, including the deployment of photovoltaic systems that enhance energy independence and reduce reliance on external energy sources.

These efforts are supported by broader strategies to further scale renewable energy adoption across our global operations in the coming years.

In parallel, we continue to drive energy-efficiency improvements across our real estate and IT infrastructure.

Initiatives such as the deployment of LED lighting, installation of smart building management systems, and optimization of heating and cooling technologies have reduced energy consumption in offices and operational facilities.

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A key enabler of these improvements has been the consolidation and optimization of office space. Underutilized locations have been closed, downsized or reconfigured to align with evolving workplace needs, and this approach has delivered both environmental and operational benefits, reducing overall energy demand while improving space utilization and cost efficiency.

In several instances, office consolidation has contributed to significant reductions in greenhouse gas emissions, demonstrating the impact of structural operational changes on decarbonization outcomes.

Sustainable mobility is another critical focus area, and we are actively transitioning our corporate vehicle fleet to lower-emission alternatives.

This transition is supported by policies that prioritize electric and hybrid vehicles, and the gradual phasing out of high-emission internal combustion engines. It is underpinned by the rollout of electric vehicle charging infrastructure at key sites and complemented by broader mobility strategies that encourage reduced travel and more sustainable commuting practices.

Measures such as remote project delivery, carpooling and the prioritization of rail travel over air travel contribute to reducing both direct and indirect emissions associated with business travel. In several markets, notable progress has been made in fleet electrification, including near-complete transitions to hybrid or electric fleets in some locations.

Beyond direct operational emissions, we are advancing circular economy practices to reduce upstream and downstream environmental impacts.

These include initiatives to extend the lifecycle of IT equipment through refurbishment, resale, donation and responsible recycling. These initiatives reduce electronic waste, avoid emissions associated with new hardware production, and generate social value by supporting access to technology in underserved communities.

In certain markets, innovative partnerships have further enabled the transformation of electronic waste into secondary industrial materials, contributing to a zero-waste-to-landfill approach while supporting broader industrial ecosystems.

Waste reduction and resource efficiency are also being addressed through targeted initiatives across facilities.

Measures such as waste segregation, recycling programs and the replacement of single-use materials with reusable alternatives contribute to lowering environmental impacts and promoting sustainable behaviors among employees. In addition, digitalization efforts, including the transition to cloud-based infrastructure and paperless processes, support reductions in energy consumption and resource use across operations.

Supplementing operational decarbonization, we are investing in nature-based solutions to support carbon removal and ecosystem restoration. For example, peatland restoration initiatives are being supported to enhance carbon sequestration while delivering biodiversity and community benefits. These projects demonstrate a holistic approach to climate action, recognizing the role of natural systems in achieving long-term climate goals.

Collectively, these initiatives have delivered measurable progress.

Significant reductions in Scope 1 and Scope 2 emissions have been achieved in several markets, driven by renewable energy adoption, energy-efficiency improvements and fleet transformation.

Operational optimization measures, including office consolidation and digitalization, have contributed to both emissions reductions and cost efficiencies. In some regions, emissions-reduction targets have already been exceeded, reflecting the effectiveness of implemented measures.

Circular economy initiatives have also generated quantifiable environmental benefits, including avoided emissions, reduced waste and improved resource efficiency.

Our decarbonization journey continues to evolve, with future priorities focused on scaling renewable energy adoption, accelerating fleet electrification, enhancing the accuracy and transparency of emissions data, and expanding value chain engagement.

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By embedding decarbonization into its global operations and fostering a culture of continuous improvement, we are strengthening our contribution to climate action while supporting long-term business resilience and value creation.

Across regions, several notable achievements highlight the scale and impact of these decarbonization efforts:

Portugal	DACH (Germany, Austria, Switzerland)
Near-complete electrification of fleet (99%)	~600tCO_2e lower annual Scope 2 emissions through renewable electricity procurement
APAC	**MEA**
Exceeded FY25 emissions-reduction target	Up to ~8,500tCO_2e emission reductions, driven by structural changes

NTT Global Data Centers (NTT GDC)

Decarbonization strategy and implementation

NTT Global Data Centers has defined a GHG decarbonization framework based on three principles:

- Consume less
- Do better
- Do different

Consume less

“Consume less” focuses on what we’re doing in the present moment, reducing the use of resources like energy, water and waste by optimizing existing processes.

Do better

“Do better” is about the day-to-day changes we can make. These include switching to alternative resources like renewable energy, cleaner fuels, less carbon-intensive goods and services, and enhancing recycling efforts for waste.

Do different

“Do different” includes long-term innovation and transformational decarbonization, for example through new data center designs, the external use of waste heat, nonrefrigerant cooling and alternative backup solutions.

Measurable impact

→ Heat recovery solutions

At the **Berlin 1 Data Center** in Germany, NTT Global Data Centers are implementing a heat recovery solution that will export excess heat via a ~2km pipeline to a local energy center from 2027 onwards. The heat, generated by IT systems, maintains a temperature of 20°C to 30°C, providing an optimal and reliable source for heat pumps to generate the temperature required for the local heating network. The system is designed to deliver up to 8MW of thermal capacity, and the low-carbon excess heat will serve up to 10,000 people in 4,500 apartments, 200 commercial units, as well as daycare centers and schools, while avoiding approximately 6,000tCO_2 per year.

In the **Frankfurt 4 Data Center** in Germany, we have implemented a heat recovery solution in collaboration with the local energy provider and municipality. Excess heat from data center operations is captured and upgraded using heat pumps (from ~30°C to ~75°C) for use in a district heating network. The system provides up to 1MW of heating capacity and has been operating continuously since July 2025. It supplies low-carbon heat to more than 600 households, including residential units and a local kindergarten. The project avoids approximately 570tCO_2e per year and includes a rooftop photovoltaic system supplying around 10% of the heat pump electricity demand with onsite renewable energy.

Further excess heat recovery projects are under evaluation, reflecting our ongoing efforts to expand the use of heat reuse solutions.

Waste

Across our Global Data Center operations, we continue to strengthen waste management practices by improving data transparency and operational standards. In FY25, waste reporting was expanded to Asia Pacific (APAC), enabling more comprehensive tracking and management of waste streams. In addition, the Chennai 2 Data Center achieved UL2799 Zero Waste to Landfill certification, reflecting strong waste diversion performance at this site through reuse and recycling practices.

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Case studies

Data center energy efficiency

NTT Global Data Centers

Johannesburg 1 Data Center

At the Johannesburg 1 Data Center in South Africa, cooling systems serving unoccupied suites were systematically placed into standby mode. This operational optimization reduced unnecessary cooling loads while maintaining required temperature conditions, achieving an approximate 43% reduction in non-IT load energy consumption and annual energy savings of around 0.61GWh.

Mumbai, India

At our Mumbai 6 Data Center, condenser coils of air-cooled chillers were replaced to restore system efficiency after systems were affected by mineral deposits. This upgrade led to significant performance improvements, including approximately 4.58GWh in energy savings (from May to December 2025) for non-IT load, an estimated 3,200tCO_2e emissions reduction, and a ~6% improvement in PUE.

At the Navi Mumbai 1 Data Center, fan speeds and pressure settings of pre-air handling units were optimized to better align with IT load conditions. This initiative reduced cooling-energy consumption by approximately 30%, with non-IT load energy savings of around 0.36GWh (from July to December 2025) and an estimated 258tCO_2e in emissions reduction, while maintaining stable operating conditions.

At the Navi Mumbai 2 Data Center, chiller and supply air temperature setpoints were increased by 0.5°C, following detailed analysis and client alignment. This measure reduced chiller energy consumption by approximately 17%, resulting in non-IT load energy savings of around 0.54GWh (from July to December 2025), an estimated 387tCO_2e in emissions reduction, and an ~8% improvement in PUE.

Renewable energy and low-carbon electricity

NTT Global Data Centers continues to expand the use of renewable electricity as a key lever to reduce operational emissions and support NTT DATA's net-zero commitment for Scope 1 and 2 by 2030.

Building on the progress achieved in FY24, the renewable energy share for non-IT load increased to 72% in FY25, up from 60% in FY24.

NTT Global Data Centers has established structured procurement processes enabling large-scale sourcing of renewable energy through power purchase agreements (PPAs).

In FY25, we increased the volume of renewable electricity for non-IT load sourced through PPAs by 100% compared to FY24.

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Case studies

NTT DATA Business Solutions

Multiple initiatives have been implemented to improve energy efficiency and reduce the carbon footprint of our data center operations.

At NTT DATA Business Solutions Global Managed Services GmbH, Germany, an **ISO 50001-certified energy-management system** has been implemented to systematically monitor, manage and continuously improve energy performance across operations, including data center activities. This provides a structured framework for identifying efficiency opportunities, tracking energy consumption and supporting ongoing improvement in line with recognized international standards.

At the Bautzen data center in Germany, a **large-scale on-site photovoltaic (PV) system** continues to contribute to our energy efficiency and decarbonization efforts. The system comprises 3,150 solar panels with a total capacity of up to 2MWp and is capable of supplying approximately 33% of the data center's electricity demand. This represents more than double the renewable-electricity coverage achieved by the PV installation at our Bielefeld headquarters. The PV system supports reduced electricity procurement from external sources, enhances local energy independence, and contributes to climate protection by feeding surplus renewable electricity back into the grid. It is a strategic long-term investment, with an expected return on investment over seven to eight years.

Based on production estimates, the system's output is equivalent to the annual electricity consumption of approximately 500 single-family homes. Future enhancement through battery storage has been approved. Commissioning is expected by August 2026 and will increase the site's degree of energy self-sufficiency.

At NTT DATA Business Solutions sp. z.o.o. in Poland, the **replacement of a legacy data center** with a more energy-efficient, renewable energy–powered data center has been completed. The new data center is fully operational, and the legacy facility was decommissioned and closed in January 2026 following a controlled and orderly transition. This replacement supports improved energy efficiency, the increased use of renewable electricity and reduced electricity-related emissions from data center operations while ensuring business continuity throughout the migration process.

Products and services

Client engagement on climate transition planning and decarbonization

NTT DATA continued to support clients from a wide range of industries in advancing their climate transition plans, reflecting both the breadth of our expertise and the growing demand for sustainability solutions across the market. Sectors included energy, utilities and materials, the public sector, financial institutions and manufacturing, among others.

The outcomes of the projects we deliver in this area help clients accelerate their net-zero journey by embedding tailored emissions-reduction programs and integrating climate considerations into core strategies. They enable greater transparency across Scopes 1, 2 and 3 while translating climate risks into strategic actions, improving decision-making.

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Case studies

Aqualia

Implementation of Microsoft Sustainability Manager and technical assistance for Scope 3 emissions identification and calculation

Consulting and technical assistance for the identification and evaluation of the main Scope 3 emissions, and implementation of a digital tool for emissions management.

Business need

Aqualia is a multinational company that specializes in the end-to-end water cycle, delivering high-quality technical solutions and services. The business operates in 19 countries, serving around 45 million users worldwide.

As the water sector advances in measuring and managing its climate impact, the need for accurate, structured and auditable emissions information becomes essential. Aqualia needed to identify its main emission sources and strengthen the company's ability to calculate, manage and report on its corporate carbon footprint in a consistent way.

The project aimed to strengthen Aqualia's internal understanding of its GHG emissions and their distribution across the value chain by deploying a calculation tool through Microsoft Sustainability Manager and providing internal training on how to use the tool and the calculation process.

Solution

- Assessment and prioritization of Scope 3 emission categories according to ISO 14064-1, including a high-level estimation of emissions using a combination of primary and secondary data.
- Implementation and configuration of Microsoft Sustainability Manager based on Aqualia's previous emissions inventory and organizational structure, including the development of standardized data collection templates, the calculation of emissions within the platform, and their validation against audited data. The project also included a training component on how to use the tool.
- The scope of the analysis included more than 390 facilities located in 14 countries globally, as of 2024.

Outcome

- A significance map of Scope 3 emissions identified the most relevant categories based on a multiparameter assessment across six criteria (for example, magnitude, influence and risk/opportunity). As a result, 4 out of 15 categories were prioritized.
- Recommendations were made to improve data quality and calculation accuracy, focused on increasing the use of primary data and reducing reliance on estimates for future Scope 3 assessments.
- Microsoft Sustainability Manager was implemented as a corporate digital tool to calculate emissions from sources included in the organization's inventory, based on activity data and emission FY24.
- Standardized model templates were developed to support data collection and ensure the consistent input of both primary and secondary data for upcoming GHG inventories.
- Implementation and training enabled the client to optimize its carbon footprint calculation process while also improving traceability, reporting capabilities and data-driven decision-making.

As a result, Aqualia has a better understanding of the contribution of Scope 3 emissions to its overall carbon footprint and is able to prioritize key areas for decarbonization in the coming years.

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Case studies

End-to-end net-zero journey for a global banking group

We supported a leading banking company in their sustainability reporting process by developing an end-to-end architecture that was engineered to manage complexity and scale, and integrating it with internal systems for ESG data management.

Client need

A leading international financial group wanted to evolve their climate strategy from passive regulatory compliance to active net-zero governance.

The group's primary challenge was overcoming data fragmentation across foreign subsidiaries. This would require a system capable of integrating CSRD-compliant carbon accounting (Scopes 1 and 2) with advanced forecasting.

The group needed a structured tool to centrally manage its decarbonization pathway, moving beyond historical reporting to analyze how planned actions would impact long-term targets and ensure strategic alignment across the entire global organization.

Approach

To support the group in moving from measurement to action, sustainability data was treated not as a reporting output but as a strategic asset to guide decision-making and monitor progress against net-zero commitments embedded within the industrial sustainability plan.

We designed an end-to-end architecture based on three interconnected layers:

- A data foundation that acts as a centralized backbone for CO_2e data collection and governance
- Operational and analytical portals supporting CSRD reporting, net-zero forecasting (Office for Environmental Protection (OEP)) and additional sustainability use cases
- Corporate reporting, powered by Tagetik, integrating sustainability data into enterprise reporting processes

Solution and outcome

The group obtained an end-to-end operational net-zero platform that enables:

- Centralized and governed carbon data management across entities and geographies, ensuring traceability, auditability and data quality
- Efficient and compliant CSRD reporting, enabled by automated data consolidation and seamless integration with Tagetik
- Actionable net-zero planning and monitoring, leveraging forecasting, project tracking and what-if scenario analyses

This scalable sustainability platform can also integrate additional use cases such as Scope 3 and extended ESG reporting.

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Case studies

Port Authority of Avilés

Energy transition roadmap for the decarbonization of the Port of Avilés

Technical assistance for the development of a roadmap for renewable self-generation and decarbonization of the Port of Avilés

Business need

The Port Authority of Avilés (APA) is one of the 28 public entities responsible for managing facilities under the control of Puertos del Estado (State Ports). Its scope of action includes the two ports that belong to the estuary of Avilés, in Asturias, Spain.

NTT DATA provides consulting and technical assistance to help the APA draft a roadmap that defines a clear and structured strategy for implementing renewable energy generation projects across port buildings and facilities for their supply to port facilities, and for possible discharge of surpluses to the electricity grid.

Solution

The project has five workstreams:

1. Preliminary analysis of solutions based on self-consumption or local energy communities, based on renewable energies
2. Definition of a conceptual project proposal
3. Analysis of potential synergies and collaboration possibilities with other agents in the port area and surrounds
4. Analysis of available aid funds
5. Definition of additional measures to be developed, including energy, economic and environmental savings, with a focus on CO_2 emissions reduction.

Outcome

- A baseline of the Port's status, focusing on energy consumption, space and the electrical network, together with the identification of potential projects
- 5 conceptual projects defined, including battery storage systems and PV installations, designed to achieve over 50% self-consumption, with projected energy generation exceeding 1,000MWh/year
- List of cooperation activities and synergies with the identified agents, based on the study of the ecosystem of actors in the Port of Avilés and surrounding areas
- Proposal for accessing European funds, providing a summary table of available subsidies, application periods, eligible beneficiaries and key requirements
- Consolidated roadmap including all project information, defined proposals, and energy saving and decarbonization measures



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Policies and conditions

Current policies relevant to the Climate Transition Plan

Human rights

NTT Group Human Rights Policy

→ Human Rights Policy

NTT DATA, Inc. Code of Business Ethics

→ Code of Business Ethics

Modern slavery

NTT DATA, Inc. Modern Slavery and Human Trafficking Statement FY25

→ Modern Slavery and Human Trafficking Statement

Whistleblowing and grievances

SpeakUp channel for reporting ethical and compliance concerns

→ SpeakUp

Enterprise Risk Management

- Risk Management Policy (internal document)
- Risk Management Framework (internal document)

Procurement and supply chain

NTT DATA Group Corporation Procurement Policy

→ Procurement Policy

→ Guidelines for Sustainability in Supply Chain

- Third-Party Due Diligence Policy for Antibribery and Anticorruption (internal document)

Environment

Environmental Policy

→ Environmental Policy

Financial planning

As at the reporting date, NTT DATA, Inc. had not adopted a formalized financial and investment plan for the implementation of its Climate Transition Plan for climate change mitigation. This information is therefore not disclosed at this time.

Engagement strategy

Engagement with value chain

Activities relating to suppliers are addressed in the case study for supplier engagement in Section 2.3: Sustainable Supply Chain.

→ Section 2.3: Sustainable Supply Chain

Activities relating to clients and the value chain are addressed through reference statements in the section of the Climate Transition Plan.

→ Climate Transition Plan
[E1-1]

Engagement with industry

Activities relating to industry engagement, particularly in relation to our work with the World Business Council for Sustainable Development (WBCSD), are set out in the section on industry recognition and rewards.

NTT DATA is a member of established sustainability-led organizations. Through our active participation in different working groups and forums, we aim to contribute to the latest discussions, foster collaboration, drive innovation, and support thought leadership on these topics, strengthening our commitment in the areas of sustainability, climate and nature action.

→ World Business Council for Sustainable Development (WBCSD)

Engagement with government, public sector and civil society

At the reporting date, NTT DATA, Inc. did not identify relevant information to disclose in relation to engagement with government, public sector and civil society within the context of this Climate Transition Plan. Accordingly, no substantive disclosure is provided for this element at this time.

Metrics and targets

Governance, engagement, and business and operational metrics and targets

At the reporting date, NTT DATA, Inc. had not identified sufficiently specific, decision-useful information to disclose in relation to governance, engagement, business and operational metrics and targets within the context of this Climate Transition Plan. Accordingly, no substantive disclosure is provided for this element at this time.

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Financial metrics and targets

At the reporting date, NTT DATA, Inc. had not identified sufficiently specific, decision-useful information to disclose in relation to financial metrics and targets within the context of this Climate Transition Plan. Accordingly, no substantive disclosure is provided for this element at this time.

GHG metrics and targets

GHG metrics and targets, including targets, metrics and the related methodology, are disclosed in Section 1.1: Climate Change.

→ 1.1.2: Targets and KPI framework
[E1 MDR-T, E1-4]

→ 1.1.3: Actions
[E1 MDR-A, E1-3]

→ 1.1.5: Greenhouse gas (GHG): Reporting methodology, assumptions and assurance
[E1-6 MDR-M]

Carbon credits

Carbon dioxide removal (CDR)

To help address hard-to-abate residual emissions on its net-zero pathway, NTT DATA Group Corporation has commenced with the procurement of high-quality carbon dioxide removal (CDR) credits. This approach is intended as a last-mile complement, not a substitute for direct emissions reductions.

Governance

Board oversight and reporting

Board oversight and reporting are addressed in the governance section of the introduction.

→ Governance
[ESRS 2 SBM-2, IRO-2, G1.GOV-1]

Management roles, responsibility and accountability

Management roles, responsibility and accountability are addressed in the governance section of the introduction.

→ Impacts, risks and opportunities (IROs)
[ESRS 2 GOV-1, IRO-1, SBM-3]

Culture

Culture is addressed throughout Section 3: People Positive, particularly in section 3.1:People-centric Company.

→ Section 3: People Positive

→ 3.1:People-centric Company

Incentives and remuneration

Incentives and remuneration linked to sustainability KPIs and annual targets

NTT DATA, Inc. integrates sustainability objectives into its remuneration framework to reinforce management accountability and support long-term value creation in line with its sustainability strategy and material topics.

Linkage to sustainability KPIs

Performance-linked remuneration for directors and employees incorporates sustainability-related KPIs alongside financial metrics.

For directors who are not Audit and Supervisory Committee members, total remuneration comprises:

- Fixed remuneration: 50%
- Short-term performance-linked compensation (bonuses): 30%
- Medium- to long-term performance-linked compensation (including stock-based components): 20%

Sustainability performance indicators are included in the short-term performance-linked component, reflecting their role as key management priorities alongside financial outcomes.

Sustainability KPIs used for remuneration

The sustainability KPIs linked to incentives are derived from NTT DATA's materiality and management targets and include:

Greenhouse gas (GHG) emissions

- Definition: Progress against Group-wide GHG emission-reduction targets for Scope 1 and 2 emissions, aligned with the NTT DATA Net-Zero Vision 2040.
- Objective: Reduce environmental impact of operations and contribute to decarbonization.

Employee engagement ratio

- Definition: Year-on-year improvement in employee engagement, measured through global engagement surveys.
- Objective: Strengthen corporate culture, talent retention and productivity.

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Diversity and inclusion indicator: Ratio of new female managers appointed

- Definition: Achievement of targets related to improving gender diversity in management positions.
- Objective: Promote an inclusive leadership pipeline and diverse decision-making.

These indicators are reviewed annually and aligned with NTT DATA's medium-term management plan and sustainability priorities.

Performance assessment and outcomes

Performance against sustainability KPIs is assessed against predefined annual targets, with outcomes influencing bonus determinations. In recent reporting periods:

- Progress toward GHG emission-reduction targets has been maintained in line with plans.
- Employee engagement has continued to improve year on year at Group level.
- Diversity-related targets, including the appointment of female managers, have remained a focus of leadership evaluation.

For employees, bonus schemes also partially reflect social-contribution activities and progress in promoting sustainability-related offerings, reinforcing organization-wide alignment with sustainability goals.

Forward focus

NTT DATA continues to refine the integration of sustainability KPIs into remuneration, ensuring that incentives support the accelerated delivery of environmental, social and governance objectives while contributing to resilient business growth.

Skills, competencies and training

Training programs and initiatives for developing skills and competencies

Carbon Literacy Training at NTT DATA

The Carbon Literacy program was formally launched in September 2025 in direct response to clear employee feedback and capability gaps identified through the Global IT 2025 Sustainable IT Survey. The survey showed:

- 50% of respondents were not familiar with the NTT DATA Net-Zero 2040 Vision.
- Most employees were only somewhat familiar with sustainable IT concepts.
- There was strong demand for structured training, certifications and practical guidance on how sustainability applies to both work and personal decision-making.

Employees explicitly asked for:

- Education that raises awareness and results in actionable change
- Training that connects sustainability to the digital and technology sector
- Guidance on how behaviors inside and outside of work contribute to climate impact

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In response, we partnered with The Carbon Literacy Project, a recognized nonprofit in the UK, to deliver a world-class, accredited training program tailored to IT professionals. The intent was not only to inform but also to drive cultural change by embedding sustainability into everyday IT decisions, leadership behaviors and organizational KPIs.

The program aligned closely with:

- NTT DATA's Net-Zero 2040 Vision
- The IT Sustainability CoE FY25 strategic priorities
- A leadership-led approach to institutionalize sustainability with the 2,000 employees of Global IT

Impact of the program

The Carbon Literacy program has delivered strong, quantifiable outcomes in the areas of reach, quality, capability uplift and behavioral change.

Scale and participation:

- 250+ NTT DATA employees trained
- 106 employees Carbon Literacy Certified
- 1,400+ training hours delivered
- Training delivered across 15+ countries

Learning effectiveness and satisfaction:

- 4.9/5 average course rating
- 100% of participants reported the course:
- Improved their climate science and digital and technology sustainability knowledge
- Increased their understanding of NTT DATA's sustainability strategy
- Empowered them to take action on climate change
- All participants said they would recommend the training to colleagues

Behavior change and real-world action:

- 200+ carbon reduction actions pledged, moving learning from theory into practice
- Evidence pledges required for certification ensured accountability and tangible outcomes, not passive learning

Overall value delivered

Carbon Literacy has proven to be more than a training initiative. It has become a capability accelerator and culture-shift mechanism by:

- Transforming sustainability from a corporate social responsibility (CSR) concept into a day-to-day IT design and governance requirement
- Enabling lower-carbon digital services, improved sourcing decisions and more sustainable architectures
- Strengthening employee engagement, sense of purpose and employer value proposition—especially for digital talent



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Other initiatives

- **Annual compliance training aligned to the NTT DATA Code of Business Ethics,** which includes human rights, modern slavery, human trafficking, and forced- and child-labor topics. The training is mandatory, and 94% of employees completed the training in FY25.
- **Human rights training programs shared** via the Human Rights Thematic Working Group (TWG) and ongoing group-wide collection of human rights-related training data to support improved training design, shared best practice and strengthen external disclosure.
- **Sustainability Academy (under development)** to provide structured learning content to employees on all of our material topics. This academy is planned for launch internally in Q1 of FY26. Phase 1 includes a strategic overview of our material topics and why they are material to NTT DATA, Inc., as well as a module on climate change and a module on human rights. The academy will be a mandatory part of our onboarding process for new employees and for certain targeted roles, while remaining optional and accessible for all other employees.

Climate-related risks

[E1.SBM-3, E1.IRO-1]

NTT DATA, Inc.'s climate-related assessments identify risks primarily related to physical hazards, considering different climate scenarios and time horizons.

Physical risks include both acute and chronic hazards. Acute risks relate to extreme weather events such as flooding (including fluvial, pluvial and coastal flooding), landslides, tropical cyclones and wildfires, while chronic risks include long-term changes in climate patterns such as temperature extremes, drought and water stress. These risks may affect our operations, including offices and data centers, depending on their location and operational characteristics.

The assessment is based on scenario analysis using multiple climate scenarios (including SSP1-2.6, SSP2-4.5, SSP3-7.0 and SSP5-8.5) and covers short-, medium- and long-term time horizons corresponding to the 2030s, 2040s and 2050s and beyond. It uses relative analytical indicators to understand trends and comparative risk levels across scenarios and time horizons. The scope of the analysis is limited to NTT DATA, Inc.'s own operations, including offices, data centers and warehouses, and does not include impacts across the value chain.

With respect to transition risks, we have not conducted a standalone quantitative assessment at this stage. Transition risks, including carbon pricing and reputational risks, are assessed qualitatively. We are in the process of enhancing our analytical capabilities and plans to conduct a quantitative assessment of transition risks, with a particular focus on carbon pricing in FY26.

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1.2. Circularity

This material topic recognizes the importance of circularity in our own operations and in the solutions we provide to clients. Our approach focuses on using resources more efficiently, extending the life of technology assets and reducing waste across our operations and value chain.

As the global transition to a circular economy accelerates, we are working on standardizing the efficient and circular use of resources in our own business while developing solutions that will help our clients and society transition to a circular economy.

Our approach includes improving how we procure, use, recover and manage technology assets and materials across our operations and value chain, and enabling our clients to reduce waste, extend the life of their assets, and embed circular principles into digital and business transformation.

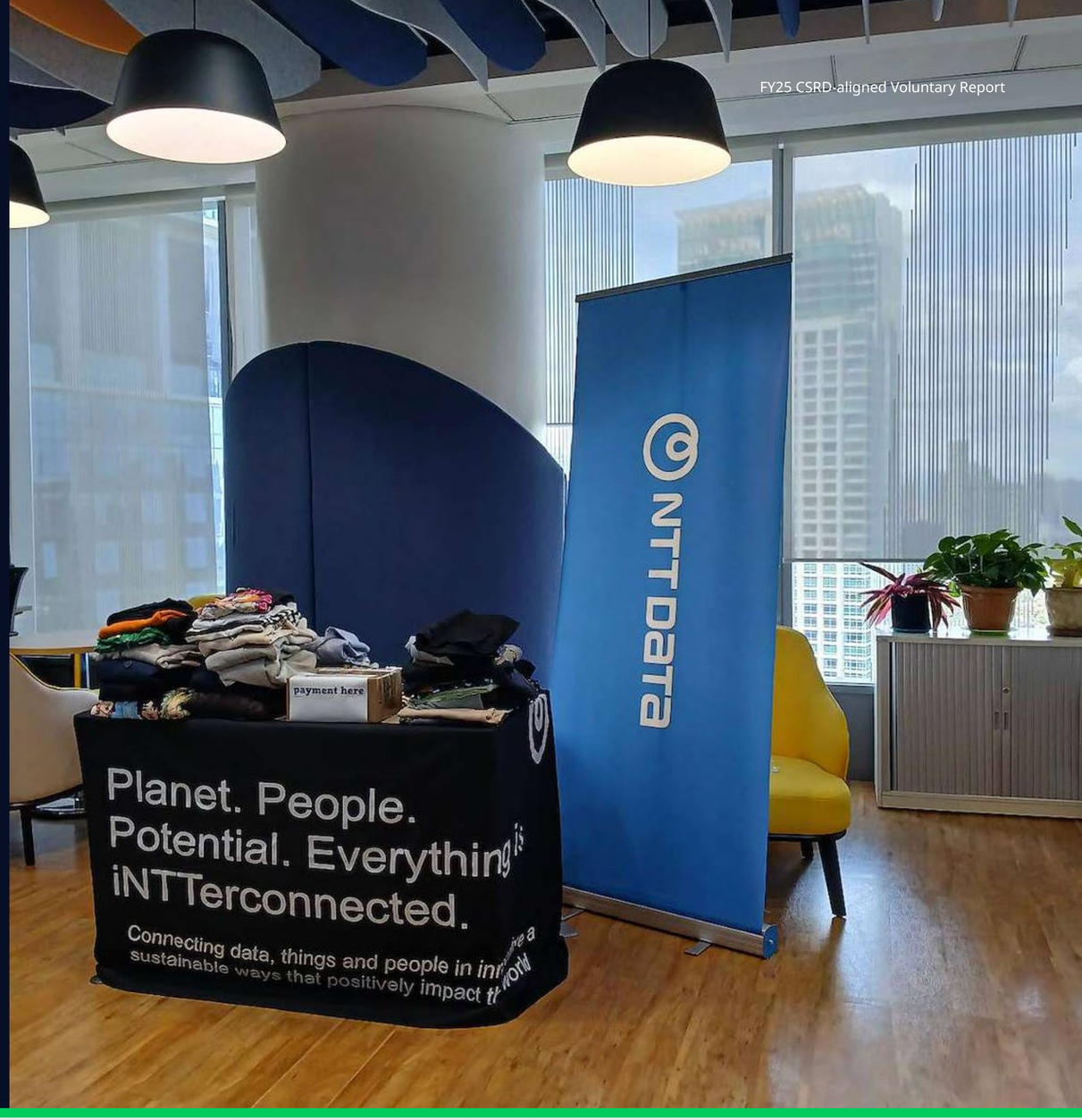
1.2.1. Waste

[E5-5, E5-5 MDR-M]

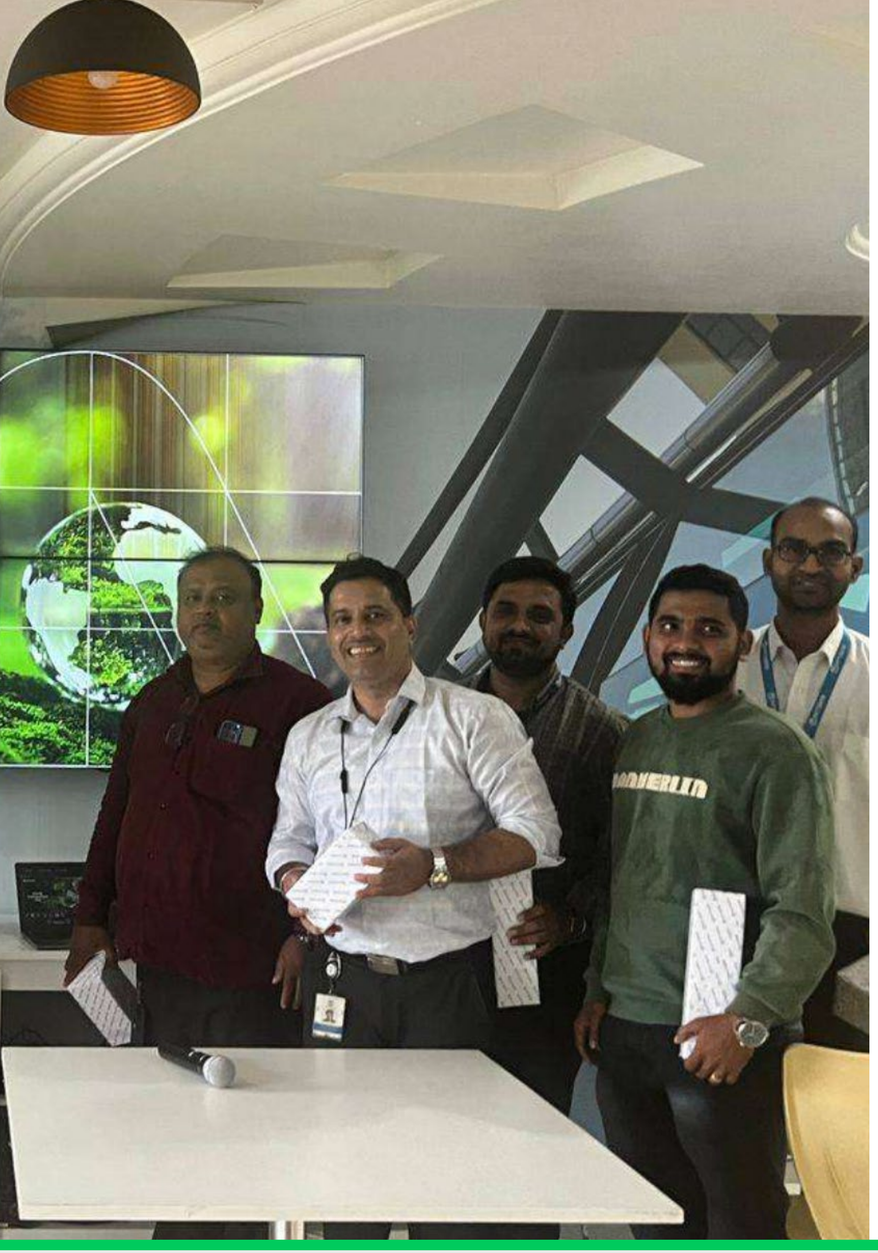
Table 5 Waste

Metric	Sum of waste quantity (kg)
Waste incinerated without energy recovery	265,885.05
Waste sent to landfill	607,957.44
Waste reused or recycled	1,259,131.45
Total	2,132,973.94

Waste data is incomplete across NTT DATA, Inc. and the above figures represent only NTT Global Data Centers.



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NTT DATA, Inc.: From material topic to operationalization of a global approach for advancing circularity

Circularity is now a Planet Positive material topic for NTT DATA, alongside climate and water, because of its impact on resource use, e-waste, emissions and long-term value. It focuses on how we buy, use and retire technology assets across the organization. In partnership with the Group, Global IT defined our standard circularity scope and created e-waste diversion and responsible lifecycle-management KPIs for laptops for sustainability reporting.

Translating purpose into action: Our Global IT Circularity Program

In August 2025, Global IT launched the Global IT Circularity Program with more than 300 field technicians, in over 60 countries, covering over 160,000 end-user assets. The program addressed fragmented CMDBs, vendors and processes and, rather than being a one-off initiative, it uses a structured, phased approach that incorporates governance, data, operations and change management to drive positive outcomes.

Defining what success looks like: Circularity KPIs and metrics

Phase 1 focused on asset data cleanup and defining metrics aligned to circularity KPIs. Metrics span the full asset lifecycle, from procurement to end of use, and are embedded in ServiceNow. Key measures include 100% device inventory reporting in all regions; dashboards aligned to circularity KPIs; e-waste diversion; responsible lifecycle management indicators; and buying behaviors.

Policy, process and vendor alignment: Enabling circularity at scale

Baseline activities then focused on the global standardization of policies, processes and a circularity metrics framework with baseline dashboards. With hardware sourced from vendors like Dell Technologies and HP, and 41 IT asset disposition (ITAD) providers globally, vendor alignment was critical. A global ITAD vendor analysis and new circularity and carbon-offsetting guidelines for laptop sourcing ensure circularity is built into both asset management and procurement.

From implementation to operational readiness

Phase 2 focused on implementation and operational readiness, including communication and training for delivery teams, ServiceNow configuration for circularity reporting, and dashboard testing. Circularity KPIs are now embedded in FY26 objectives within Global IT, with governance cadences defined to drive behavior change and accountability at local and global levels.

Operationalizing circularity by making it business as usual

Phase 3 shifts from project to practice. With a single CMDB in ServiceNow, Global IT gains real-time insights and consistent global reporting on circularity. Ongoing work focuses on improving asset management practices, aligning ITAD vendors to circularity practices, and managing lifecycle cost. Circularity will become an operating principle, supporting better financial outcomes and environmental benefits.

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Advancing global circularity

An e-waste recycling initiative in collaboration with Dell Technologies in Singapore

In FY25, NTT DATA partnered with Dell Technologies to implement an e-waste recycling initiative in Singapore as part of our sustainability collaboration. The initiative aimed to promote responsible e-waste management, raise awareness of advanced recycling solutions, and support clients in strengthening their ESG practices.

The program was implemented as a five-week campaign, taking place from January to February 2026. During the campaign, an electric van was deployed at seven client sites to facilitate the collection of employees' personal e-waste, including laptops, mobile devices and other IT equipment. This approach made it easy for people to participate while reinforcing sustainable behavior by individuals and organizations.

Clients included financial institutions, government agencies, healthcare providers and aviation companies. Over the campaign period, more than 3 tonnes of e-waste was collected, demonstrating strong participation and tangible environmental impact.

In addition to environmental benefits, the initiative contributed to increased awareness of circular economy practices and the responsible disposal of electronic waste. It also received external recognition, including media coverage and a record-setting achievement by one participating organization for the largest e-waste collection campaign in Singapore.

This collaboration highlights our ability to work with strategic partners to deliver scalable sustainability solutions and support our broader commitment to addressing material topics such as climate change, resource efficiency and circular economy. The success of the initiative has also strengthened the foundation for continued collaboration with Dell Technologies on future sustainability initiatives in the APAC region.

Highlights from the program

- **7 participating clients:** Bank of America, Central Provident Board (CPF), Inland Revenue Authority of Singapore (IRAS), Ministry of National Development (MND), Punggol Green Primary School, Sengkang General and Community Hospitals, Singapore Airlines
- Over **3 tonnes of e-waste** collected over five weeks
- **Media coverage** from local newspaper, Zaobao
- Seng Kang Hospital achieved their goal of collecting over **888kg** of e-waste and received certification from Singapore **Book of Records**
- Most e-waste from a single person: 57.74kg!
- Promoted awareness of advanced recycling solutions (ARS) and amplified corporate social responsibility (CSR) and ESG efforts



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Case studies

Advancing global circularity

IT circularity and zero waste to landfill in South Africa

In partnership with a specialist recycling ecosystem, we implemented a high-impact circular IT model that achieved **100% zero waste to landfill** through ISO 14001-certified recycling processes, ensuring full regulatory compliance and secure data destruction.

A total of **28,513kg of end-of-life IT equipment** was processed, with **7,074kg formally certified as recycled,** and the remaining volumes managed across mixed OEM recovery streams.

Through advanced dismantling and material recovery processes, over **95% of materials were extracted and reintroduced into supply chains,** including **4,571kg of steel, 1,376kg of printed circuit boards,** and **305kg of aluminium**, with only **111kg of residual waste** remaining.

Recovered materials are fed back into local manufacturing ecosystems, supporting sectors such as automotive and industrial fabrication, reducing reliance on virgin resource extraction and imports, and strengthening local circular supply chains.

This model delivers measurable sustainability impact, including tens of tonnes of waste diverted from landfill per cycle, material reuse that reduces upstream carbon emissions, and the creation of secondary economic value from IT assets.

Overall, the programme demonstrates a scalable circular economy approach by maximizing resource recovery, eliminating landfill disposal, and generating environmental, economic, and supply chain value while advancing ESG and Scope 3 reduction objectives.

Advancing global circularity

Other initiatives in our global operations

Germany, Austria and Switzerland donated almost 300 monitors from offices to hospitals in the Ukraine, and in North America, over 700 devices were donated to a not-for-profit ITAD vendor so they could be repurposed for use in schools, avoiding over **3,500kg of e-waste.**

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1.3. Water Management

This material topic recognizes the growing importance of water stewardship in our own operations, particularly in facilities with higher water dependency, as well as in the solutions we provide to clients. Our approach focuses on monitoring, efficiency and risk-informed management to support responsible water use over time.

As the supply-and-demand gap for fresh water widens, we will work to improve water management in our data centers, particularly in high water-stress areas that use evaporative cooling. We will also contribute to improving the water management of our clients through our solutions.

1.3.1. Policy

[E3 MDR-P]

Our Environmental Policy provides practical guidance on protecting the environment, in line with the NTT DATA, Inc. Code of Business Ethics and the principles set out in our mission and values.

We identify, evaluate and address environmental risks and opportunities to set environmental goals and engage in protection activities. We conduct risk-based due diligence to identify, prevent and mitigate actual and potential negative impacts.

Water management

We will work on efficient water management in data centers, especially in high water-stressed areas.

We will provide solutions that contribute to efficient water management.

1.3.2. Water consumption

[E3-4, E3-4 MDR-M]

Table 6 Water consumption

Water withdrawal	4,452,253,416.10 liters
Water consumption	336,765,065.77 liters
Water discharge	4,124,325,607.37 liters

Water data is incomplete across NTT DATA, Inc. The figures above represent NTT DATA Business Solutions, NTT Global Data Centers, our Group functions, and the regions of the Middle East and Africa (MEA) and North America.

Data is aggregated for data centers. However, small-scale data centers and IT server rooms that share facilities with other business entities are excluded where it has been confirmed that water data cannot be obtained due to the absence of individual meters. Offices are excluded from the scope, as their water use is limited to sanitary purposes and the volume of water used is minimal.

Water consumption refers to the volume of water withdrawn that is not discharged after use due to evaporation or other factors. Recycled water refers to the volume of water that is treated and reused after use.

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1.3.3. Water management in our data centers

In FY25 we continued with our established water management practices as part of our ongoing operations.

NTT Global Data Centers continues to manage water usage through established measures such as monitoring water consumption and water usage effectiveness, and optimizing cooling system operations, where applicable. Water management remains an integral part of operational performance, and initiatives are evaluated on a continuous-improvement basis, depending on site-specific requirements and priorities.

Non-disclosures

Climate Change, Water Management and Circularity

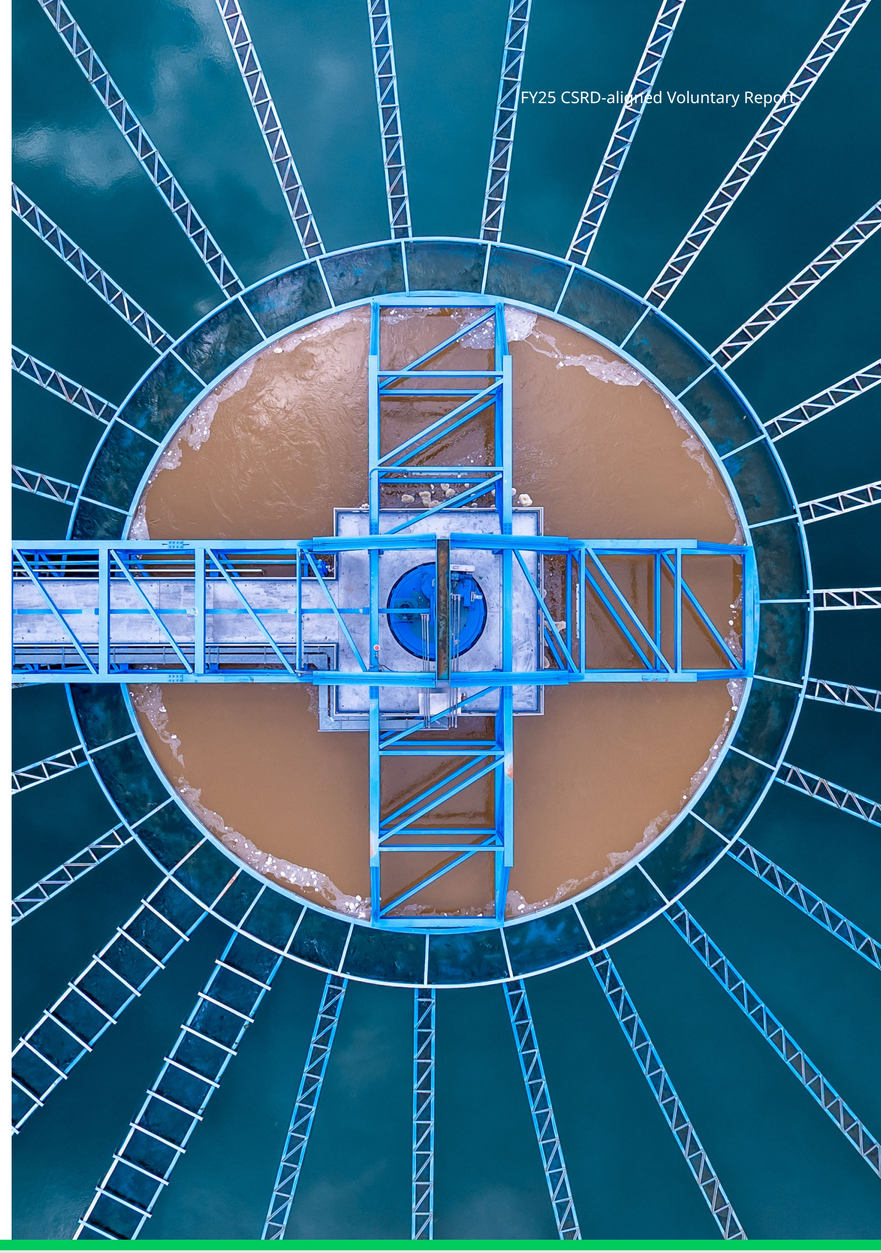
This statement has been published on a voluntary basis in advance of the Company's anticipated mandatory application of the Corporate Sustainability Reporting Directive (CSRD), which is expected to apply to reporting on FY27 data.

The non-disclosure of the data points listed reflects the transitional implementation of CSRD-aligned reporting systems, methodologies, governance frameworks, internal controls and assurance processes, as well as limitations in the current availability and maturity of certain data, methodologies and value chain information relevant to future alignment with the European Sustainability Reporting Standards (ESRS).

The identified data points remain material and are not omitted on the basis of immateriality. Their non-disclosure should not be interpreted as an indication of the absence of relevant policies, actions, targets or management approaches.

The full list of these material non-disclosure data points, together with the stated basis for non-disclosure and an outline of the Group's intended commitment to future reporting, is provided in Annexure A: Non-disclosure data points.

→ Annexure A: Non-disclosure data points



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Prosperity Positive

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Introduction to Prosperity Positive

Materiality	Indicators
Innovation through Technology	1. GenAI revenue 2. Development of GenAI expertise
Responsible Technology and AI Ethics	Establishment and operation of an AI risk-check framework
Sustainable Supply Chain	Percentage of suppliers requiring risk-based assessments with a valid regulatory sustainability self-assessment questionnaire (SAQ) by year-end
Digital Safety and Reliability	Number of critical system failures, including serious incidents involving essential services
Secure and Sustainable-by-design Services and Solu-tions	1. Number of security incidents 2. Sustainability business revenue



Transform businesses and society for successful growth through sustainable services and solutions

Global economic and technological transformation presents both opportunities for sustainable growth and risks that must be actively managed. As a global business and technology services provider, we play a critical role in enabling responsible innovation, strengthening digital resilience and embedding sustainability across value chains.

This chapter details our commitments, actions and approach to driving long-term value on five material topics:

1. Innovation Through Technology
2. Responsible Technology and AI Ethics
3. Sustainable Supply Chain
4. Digital Safety and Reliability
5. Secure and Sustainable-by-design Services and Solutions

2.1. Innovation Through Technology

This material topic recognizes the role of technology-led innovation in responding to increasingly diverse and complex societal needs, as well as in the solutions we provide to clients. Our approach focuses on applying emerging technologies, including AI, together with the expertise built through our existing services, to create practical solutions that meet these emerging needs.

As society's needs become more diverse and complex, we will develop solutions that support long-term value creation.

By combining emerging technologies, including AI, with our global expertise, we aim to deliver solutions that support resilience, productivity and sustainable growth.

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2.1.1. Case studies

The Royal Marsden NHS Foundation Trust uses AI to push the boundaries of cancer research with NTT DATA and CARPL.ai

The Royal Marsden NHS Foundation Trust, a world-leading specialist cancer center, has partnered with NTT DATA and CARPL.ai, a leading enterprise imaging artificial intelligence (AI) and machine learning operations (MLOps) platform, to design and build an advanced AI-powered radiology analysis service for the development and evaluation of AI in medical imaging.

Business need

AI's potential to enhance the speed and accuracy of identifying image biomarkers has long been recognized. Funded by a three-year grant from the UK's National Institute for Health and Care Research, the service will be used for research at The Royal Marsden and the Institute of Cancer Research, including projects in collaboration with other research teams.

Solution

This research initiative will focus on developing and evaluating AI algorithms to improve the accuracy of cancer evaluation, including sarcoma, lung, breast, brain and prostate cancers.

The service runs on an MLOps clinical imaging platform, built and operated by NTT DATA. We developed a bespoke AI computing solution that leverages high-performance Dell servers and uses the latest GPU processing capacity, orchestrated by the CARPL.ai platform, which helps test and manage AI algorithms and includes a large collection of radiology AI models.

We also provide specialist imaging AI consulting services, helping researchers at The Royal Marsden test and evaluate emerging AI tools in real clinical settings while extracting maximum insight and value from both in-house and commercial algorithms.

Outcomes

Once the service is live, research teams at The Royal Marsden will be able to evaluate a range of AI models across several cancer types. These studies will generate critical insights into how AI can support clinical decision-making and contribute to future approaches to diagnosis and treatment. This will lead to faster response times, more accurate diagnoses and better-targeted treatments.

Through CARPL.ai's centralized interface and built-in monitoring tools, the research teams will also be able to track model performance over time, enabling faster feedback loops between development and deployment — a crucial step toward clinical translation.

NTT DATA will continue to work closely with The Royal Marsden to support this next phase of research.

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Case studies

NTT DATA and Mistral AI to shape the future of sustainable and secure private AI for enterprises

Mistral AI, a rising innovator in open-weight, high-performance generative AI (GenAI) models, has partnered with NTT DATA to jointly sell and deploy safe and private enterprise-grade AI solutions that are able to foster strategic autonomy for clients. Mistral AI's solutions and advanced generative AI models, are recognized for their efficiency, performance and enterprise empowerment.

Initial focus areas include:

Sustainable and secure AI co-development

Together, we will develop sustainable and highly secure private AI solutions for organizations in regulated sectors such as financial services, insurance, defense and the public sector. The companies will provide end-to-end solutions from infrastructure to business processes powered by AI applications for clients operating on private clouds.

AI-driven innovation for IT infrastructure and customer experience

We will pioneer the integration of Mistral AI technologies into NTT DATA's customer experience platforms, beginning with agentic AI contact center solutions in Europe and Asia Pacific. Joint projects could include the co-development of LLMs for specific languages, which will further AI innovation tailored to local markets and specialized needs.

Go-to-market expansion

NTT DATA and Mistral AI will jointly develop and execute regional go-to-market strategies tailored to the unique dynamics of various countries, including France, Luxembourg, Spain, Singapore and Australia. End-to-end AI services will range from use-case development and customization to implementation, support and managed services. Dedicated sales teams will be assigned to address key client needs and priorities.

To drive innovation and implementation excellence, NTT DATA will establish a Mistral AI Center of Excellence staffed with subject matter experts and dedicated resources. In addition, Mistral AI will launch a technical enablement and certification program for NTT DATA personnel.

In one of our first joint projects, Mistral AI and NTT DATA partnered with Dennemeyer, a leading full-service global provider of intellectual property (IP) management services. We developed an AI-driven application for advanced patent searches and analyses, bringing the technical layers to securely run AI workloads.

We are also co-developing a sovereign platform in Luxembourg for clients in the financial services and insurance industries.



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GYSEV uses video, LiDAR and AI to optimize track-maintenance operations

To make rail maintenance more effective, the Hungarian–Austrian railway company Győr-Sopron-Ebenfurti Vasút (GYSEV) was investigating how to use sensors and AI to monitor their train routes and detect anomalies that could indicate problems. GYSEV brought in NTT DATA to standardize their AI infrastructure, simplify their AI projects and make the infrastructure more efficient.

Trains and tracks need regular maintenance — and so does the area around the tracks. Precise identification of the surrounding objects and predicting potential shifts is crucial.

Trees must be cut back to prevent branches from falling on the track or hitting the power lines, and to minimize the risk of slippery rails caused by falling leaves, which can lead to wheel-slide. The types of trees are identified by AI based on their leaves, and their growing rates are predicted to enable planning for clearing and other required maintenance.

It's also important to attend to walls or other structures that need repairing before they affect railway operations.

Usually, rail companies send out a team to inspect the rails at set intervals and note any issues that need attention. GYSEV was investigating the use of sensors and AI to detect anomalies that could indicate problems, one of several initiatives to boost health and safety, improve the commuter experience and streamline processes.

Having several projects across different infrastructures and AI platforms resulted in some projects overusing their AI infrastructures while others did not make full use of theirs. GYSEV wanted to consolidate their AI initiatives to make better use of resources and become more cost-efficient.

Taking data from train to data center to insights

We approached the project from two angles: consulting on the overall AI technical architecture, and assisting with the project to monitor tracks using cameras and 3D scanners mounted on the trains and cars.

For the architecture, we started by looking at the infrastructure that GYSEV was already using for their AI projects. This included infrastructure from different vendors. By understanding the resources they already had, we could create a strategy for providing a standardized solution with the processing power needed for AI applications.

The standardized infrastructure we designed uses technology from Dell Technologies, NVIDIA and VMware. To get the necessary hardware to the site, we drew on our global partnership with Dell Technologies and were able to source and ship components to deliver the project on time and within budget.

For the track-maintenance project, data captured from trains moving at high speeds had to be processed to create a digital twin of the train routes. This 3D model provides information on everything the cameras can see, from fallen branches to issues with power pylons or damage to other infrastructure.

The challenge was how to send the data from the cameras for processing without driving up costs. While the cloud is efficient for processing data generated in the cloud, the data for the digital twin is generated on trains. It is expensive to transfer data onto and off the cloud. We therefore leveraged GYSEV's existing data center infrastructure to process the data on-premises through a private AI solution.

Measurable outcomes

- **Reduced costs**
  Using a single platform for several AI projects lowers hardware and maintenance costs, as infrastructure can be managed on one platform.
- **Reduced track-maintenance time**
  The maintenance team uses data to proactively maintain the tracks and surrounding areas. By addressing potential issues before they can become big and expensive problems, they keep downtime to a minimum.
- **Preventing train delays and keeping passengers safe**
  Commuters rely on trains to get them to their destination on time, but their safety comes first. Trains stop for hazards on the track and start moving again only once the hazard is cleared. With a view of potential hazards (like tree branches about to fall), maintenance teams can clear the track when the line isn't in use.
- **Support better planning**
  The longer the cameras and sensors run, the more data the AI has to train on. Over time, it will get better at predicting maintenance patterns, seasonal changes and anomalies. These insights can be used to make informed decisions and plan for the future.

Automated monitoring for intelligent maintenance

With an integrated approach to AI infrastructure, GYSEV is adding AI and automation to their existing processes, and they're ready to develop new use cases. Their infrastructure is geared to handle the huge amount of data their sensors capture and turn data into useful insights for planning and maintenance.

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Case studies

AI-powered sports training platform to position Taiwan as a leader in sports technology innovation

NTT DATA and OSENSE, an AI imaging technology pioneer in Taiwan, have launched an advanced AI training platform for the Taiwan Institute of Sports Science (TISS). Designed to elevate the competitive performance of Taiwan's national team athletes, the platform uses predictive AI for technique analysis, performance monitoring and strategic training.

From raw data to actionable insights

The platform is built on high-performance edge computing architecture that delivers real-time motion analysis essential for elite training. It integrates high-speed, fiber-connected cameras, GPUs and a secure network attached storage (NAS) system for advanced AI image processing and storage. This platform transforms raw video data into actionable, predictive insights, identifying optimal biomechanical postures and enabling data-driven training regimens that both enhance performance and mitigate injury risk. Several athletes participated in rigorous data testing during the platform's development to confirm positive results.

Facilitating research and athlete development

NTT DATA has a track record of digitalizing international sports events. Our experience in deploying solutions such as ultrareality viewing (URV) technology for live game transmission, used for Taoyuan International Baseball Stadium, is the foundation of this platform. Our solutions will assist TISS to develop an AI training platform that facilitates research in sports science and enhances athlete development.

A new standard for AI in sports science

OSENSE and NTT DATA have a long-standing partnership in sports technology. We leveraged OSENSE's proprietary image-recognition algorithms and real-time motion analysis capabilities to create an AI training platform that integrates edge computing, high-speed imaging and AI analytics. The platform helps to optimize athlete performance and enables coaches and teams to monitor athletes in real time, reducing the risk of injuries and extending athletes' professional careers.

Elevating athlete performance

TISS aims to leverage sports science to aid national athletes by improving their training, managing their health and providing superior medical assistance. The AI training platform will bolster support for sports science in Taiwan, empowering Taiwanese athletes to succeed on the global stage.



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AI-powered cyberdefense centers to strengthen cyber resilience and counter evolving threats

NTT DATA has launched four next-generation autonomous cyberdefense centers, powered by AI technologies, in Bengaluru, Hyderabad, Noida and Mumbai, with two additional centers planned.

These purpose-built cyberdefense centers reinforce our strategic focus on modernizing cybersecurity for the AI era. They represent a shift from traditional centralized security operations to a distributed, AI-driven, hyperautomated model that learns from past incidents and human expertise to automate, triage and prioritize alerts, accelerate investigations and incident response, contain threats faster and support regional data privacy and cybersecurity regulations.

According to Omdia, autonomous security operations centers (SOCs) will become the industry standard within two years, positioning NTT DATA as a leading example of how the industry is evolving toward autonomous cyber resilience.

Next-generation technology meets global and local expertise

The next-generation cyberdefense centers combine human security experts and AI agents to defend against evolving cyberthreats. AI agents autonomously triage, analyze and hunt potential incidents, reducing investigation time by up to 60% and enabling teams to contain threats earlier. By automating high-volume, repetitive tasks, these capabilities free security analysts to focus on higher-value work such as digital forensics, containment and recovery.

Each center is purpose-built with cutting-edge technology. Key features include:

- Autonomous agent-based cyberdefense and AI-driven threat orchestration to accelerate detection and response cycles
- Real-time global threat intelligence and localized threat hunting tailored to each region's unique threat landscape
- A comprehensive portfolio of offerings, including managed detection and response (MDR), incident response, threat intelligence, compliance and regulatory advisory and cloud and OT security services
- Proactive identification of new and emerging threats, along with a clear view of cyber risks and recommendations for reducing them
- Significant risk reduction and operational efficiency improvements, including up to 90% alert reduction and 60% faster mean time to detect and respond
- Powered by industry-leading technology platforms that leverage NTT DATA's strategic partnerships

Global network with local expertise

The four cyberdefense centers in Bengaluru, Hyderabad, Noida and Mumbai expand our global cybersecurity footprint across five continents, supported by more than 40 delivery centers and SOCs in over 50 countries.

Together, these centers enhance coverage for more than 1,200 global clients by combining regional expertise with agentic AI, advanced automation and next-generation technologies.

The centers provide 24x7 unified threat monitoring, detection, response and incident management and are fully integrated with NTT DATA's SecOps global network, delivering AI-driven insights and threat intelligence through a single dashboard for identification, detection, protection and recovery.

These cyberdefense centers operate in collaboration with regional computer emergency response teams (CERTs), national cybersecurity centers (NCSCs) and government agencies to help clients meet local data privacy and AI-regulation requirements.

Benefits for clients

- **Next-generation AI-powered cyberdefense**

  As adversaries adopt AI and autonomous tactics, AI-enabled platforms help clients confidently address threats, navigate change and build long-term digital trust.

- **Enhanced regional coverage with global intelligence**

  Global enterprises receive world-class unified detection and response services with local and global capabilities, bringing global threat intelligence closer to business operations and ensuring compliance with regional data privacy and regulatory requirements.

- **Expanded talent pool**

  The increased capacity of global and local cybersecurity professionals delivered through these new centers allows NTT DATA to scale human expertise alongside intelligent automation.

- **Secure digital transformation and growth**

  Clients can accelerate edge-to-cloud transformation while continuously protecting their expanding digital ecosystems.

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Case studies

Codelco and NTT DATA sign strategic alliance to accelerate digital and sustainable transformation of future mining

NTT DATA and Codelco (National Copper Corporation of Chile) have signed a memorandum of understanding (MoU) marking the beginning of a strategic alliance that seeks to integrate emerging technologies and advanced solutions that strengthen automation, safety, and sustainability in the operations of the world's leading copper producer.

The MoU encompasses a wide range of collaboration areas, including advanced connectivity and digital infrastructure (5G/6G, photonic and satellite networks), GenAI, robotics, quantum computing, autonomous operations and clean technologies.

Potential joint initiatives will be implemented progressively through a cooperation model that promotes knowledge transfer, open innovation and the creation of shared value between both organizations, combining NTT DATA's global experience and capabilities to transform industrial processes with Codelco's mining expertise.

An alliance for innovation and sustainable development

"The future of mining is built through alliances that allow us to learn, innovate and adopt cutting-edge technologies to maintain our leading role globally. Every step we take in innovation serves a greater purpose: to strengthen Codelco as a pillar of sustainable development in Chile and the world," states Máximo Pacheco, Chair of Codelco's Board of Directors.

For NTT DATA, the alliance with Codelco represents a unique opportunity to combine our technological experience with the leadership of one of the world's most important mining companies to drive a new era of innovation and efficiency in global mining.

R&D that improves health and safety

Improving safety and productivity in the mining industry is critical, and NTT DATA will help address this by providing a comprehensive R&D framework that incorporates GenAI, the autonomous control of robots, operational understanding through digital twins, and process productivity improvement using quantum computing.

The agreement includes a governance structure with strategic committees and technical coordination teams responsible for evaluating challenges and opportunities, as well as prioritizing and overseeing the execution of programs and projects.



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Case studies

NTT DATA's award-winning training initiative is driving AI literacy and skills development for all employees worldwide

NTT DATA's GenAI Academy delivers AI learning and professional development to our global workforce in more than 70 countries. The initiative underscores our commitment to equipping employees with the AI capabilities needed to drive responsible innovation, efficiency and growth for our business and for our clients.

The GenAI Academy has established a global standard for developing multiple levels of AI expertise. Self-paced learning, hands-on labs and applied use cases help employees translate expanded AI competency into measurable business value.

Training also covers mandatory compliance with our AI governance framework and security and risk management policies. In addition to foundational AI training, the academy provides mandatory advanced levels that include role-specific training tailored for specific job functions.

NTT DATA's GenAI Academy earned a Learning and Development Gold Award in the Brandon Hall Group Excellence Awards.

We also collaborate with technology leaders and partners, including Amazon Web Services, Google Cloud, Microsoft and OpenAI, to extend additional learning opportunities to employees.

AI competency is an essential new layer in business literacy, and our goal is to equip every team member with practical AI skills and responsible tools, which represent a new form of critical infrastructure. By developing AI literacy and expertise, we are empowering our people to fully leverage our comprehensive offerings for clients, including NTT DATA's Smart AI Agent™ Ecosystem, and our partnerships with world-leading technology providers and world-class startups.

In parallel with universal skills development, we are deploying GenAI and agentic capabilities that integrate industry-leading AI tools with in-house solutions built on secure and compliant infrastructure. These capabilities are empowering employees to create innovative use cases within a safeguarded environment and in alignment with company policy and client transparency standards.

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Case studies

NTT DATA and The GEAR by Kajima launch smart building initiative in Singapore leveraging diverse technologies for KPI-driven insights

NTT DATA's collaboration with The GEAR by Kajima on "The GEAR" smart building project in Singapore continues to be recognized as a leading example of sustainable digital innovation in the built environment. NTT DATA Singapore played a key role in delivering consulting, digital infrastructure and IoT-based solutions to support the development of this smart and sustainable facility.

The project integrates more than 10 technologies and leverages over 2,000 sensors, generating over 8,700 data points to enable real-time monitoring, automation, and the optimization of building operations. These capabilities contribute to improved energy efficiency, optimized resource consumption and an enhanced occupant experience, aligning with NTT DATA's material topics related to climate change, energy efficiency and digital innovation.

A key outcome of the project is its contribution to the building's achievement of the **BCA Green Mark Platinum Super Low Energy (SLE) certification**, one of Singapore's highest sustainability standards for energy-efficient buildings. This certification reflects the project's performance in reducing energy consumption through data-driven management and smart system integration.

The GEAR building also serves as a "living lab" for sustainable innovation, enabling continuous improvement through data analytics and supporting the development of scalable solutions for smart and low-carbon infrastructure.

This project demonstrates NTT DATA's capability to deliver integrated digital solutions that contribute to decarbonization and sustainable urban development, supporting clients in achieving their environmental goals while enhancing operational performance.



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2.2. Responsible Technology and AI Ethics

This material topic recognizes the need to promote responsible technology use while managing potential negative impacts on people and society, including human rights and ethical risks linked to AI and other digital technologies. Our approach focuses on policy-led governance, risk assessment and human-centric design to support ethical, lawful, transparent and secure technology use.

As AI and emerging technologies become more embedded in business and society, we are strengthening our governance of responsible technology, applying structured policies and controls to guide AI use, protect data and privacy, and reduce the risk of unintended harm.

For AI to drive enduring business and societal benefit, it must uphold ethical standards and embed responsibility into every stage of its lifecycle.

We aim to help clients adopt technology responsibly through solutions and advisory services that support secure, ethical and transparent innovation while maintaining trust with users, employees and society.

2.2.1. KPI

NTT DATA, Inc. has set a target to apply defined AI risk assessment and responsible AI governance controls to 100% of in-scope internal AI use cases by FY27, using a structured, risk-based AI governance and assessment model.

This target supports the responsible, lawful, transparent and secure use of AI technologies, including consideration of ethical principles, as defined in the internal NTT DATA Group AI Risk Management Policy and implemented across our operations.

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2.2.2. Policies

[S4 MDR-P]

NTT Group AI Charter

Key contents, objectives and relevance to material impacts, risks and opportunities

The NTT Group AI Charter establishes the overarching group wide principles for the responsible, ethical and human centric development and use of artificial intelligence across the NTT Group.

Objectives

- Realizing societal wellbeing and sustainability through AI
- Ensuring the fairness, reliability, explainability and transparency of AI systems
- Protecting data, privacy and fundamental human rights
- Preventing harm to individuals, including consumers and end users

Material impacts, risks and opportunities addressed

- Potential adverse impacts on consumers arising from biased, unsafe, non transparent or privacy infringing AI systems
- Regulatory, legal and reputational risks linked to irresponsible AI use
- Opportunities to build consumer trust, enable responsible innovation and deliver socially sustainable digital solutions

Scope of the policy and affected stakeholders

Own operations

Applies to all NTT Group companies and employees involved in AI research, development, deployment and use

Value chain

Guides expectations for AI use affecting clients, consumers and end users through products and services

Geographical scope

Global

Affected stakeholders

Consumers, end users, clients, society at large, employees

Third-party standards or initiatives

Informed by internationally recognized principles for ethical and trustworthy AI, including fairness, transparency, data protection and human rights, as reflected in global AI governance discourse.

→ NTT Group AI Charter



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NTT DATA Group AI Risk Management Policy

Key contents, objectives, and relevance to material impacts, risks and opportunities

The policy defines a formal framework for identifying, assessing, mitigating and monitoring AI related risks across the Group.

Objectives

- Systematically manage AI risks, including misuse, malicious use, bias, privacy, security and environmental harm
- Protect consumers and end users from harmful or unsafe AI outcomes
- Ensure compliance with applicable laws, regulations and internal governance requirements

Material impacts, risks and opportunities addressed

- Addresses risks of consumer harm arising from AI errors, misuse, lack of explainability or inappropriate deployment
- Reduces legal and reputational exposure
- Supports responsible AI innovation and safe adoption at scale

Changes during the reporting period:

- Updated to include risks related to AI agents, misuse and malicious use, and enhanced reporting processes (Version 1.4).

Scope of the policy and affected stakeholders

Own operations

Mandatory for NTT DATA Group Corporation, NTT DATA Japan Corporation, NTT DATA, Inc. and Unit Headquarters.

Upstream/downstream

Applies to AI systems impacting clients, consumers and end users

Geographical scope

Global

Affected stakeholders

Consumers, end users, clients, internal AI operators and governance bodies

Third-party standards or initiatives

Aligned with global AI risk management and governance best practices and regulatory expectations referenced in the policy framework.

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NTT DATA, Inc. AI Use Policy

Key contents, objectives, and relevance to material impacts, risks and opportunities

The policy sets mandatory rules and guidance for employee and contractor use of AI within NTT DATA, Inc. with regard to:

- Ensuring lawful, ethical and responsible AI use
- Preventing harm to consumers and end users arising from inappropriate data use, confidentiality breaches or misuse of AI outputs
- Embedding transparency, human oversight and accountability in AI use
- Material impacts, risks and opportunities addressed
- Manages risks of consumer data misuse, intellectual property (IP) infringement, misleading outputs or automation errors
- Supports trusted and compliant service delivery
- Enables safe productivity and innovation benefits from AI adoption

Changes during the reporting period

Initial release and rollout as an NTT DATA, Inc. level operational policy aligned to Group AI governance.

Scope of the policy and affected stakeholders

→ Own operations

All NTT DATA, Inc. employees, contractors and authorized third parties

→ Downstream value chain

Protects clients, consumers and end users affected by AI enabled services

→ Geographical scope

All regions where NTT DATA, Inc. operates

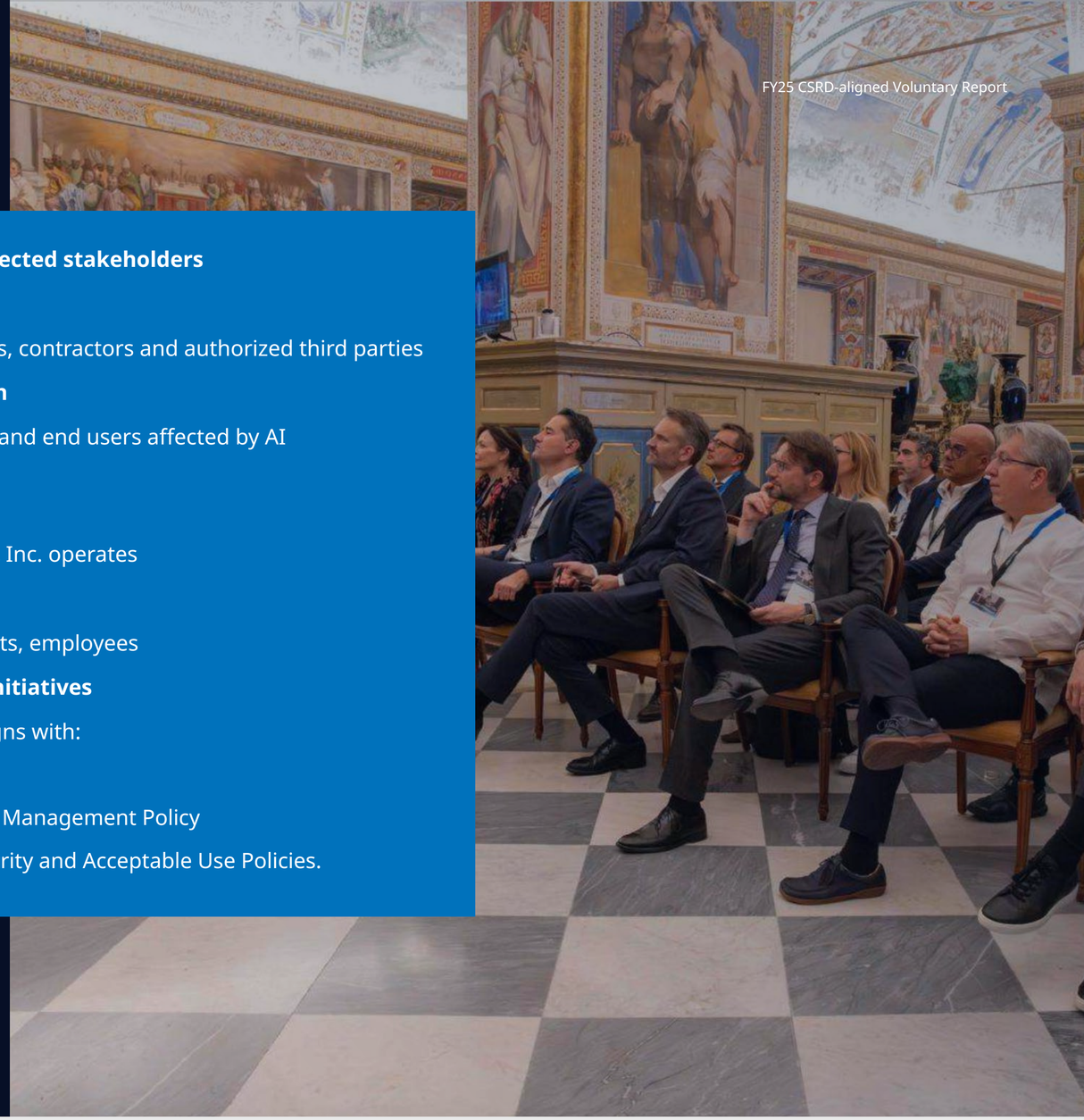
→ Affected stakeholders

Consumers, end users, clients, employees

Third-party standards or initiatives

Explicitly references and aligns with:

- NTT Group AI Charter
- NTT DATA Group AI Risk Management Policy
- Group Information Security and Acceptable Use Policies.



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NTT DATA Code of Business Ethics

Key contents, objectives, and relevance to material impacts, risks and opportunities

The policy establishes ethical standards governing fair, lawful and responsible business conduct:

- Acting with integrity, fairness and transparency
- Safeguarding information assets and stakeholder trust
- Preventing misuse of company assets and data

Material impacts, risks and opportunities addressed

- Protects consumers and end-users from unethical, misleading or unsafe practices
- Reduces risk of consumer harm, regulatory breaches and reputational damage
- Strengthens long term trust and corporate credibility

Scope of the policy and affected stakeholders

Own operations

All employees and representatives globally

Value chain

Sets expectations impacting clients, consumers and business partners

Geographical scope

Global

Affected stakeholders

Consumers, end users, clients, society, employees

Third-party standards or initiatives

Reflects internationally accepted principles of business ethics, compliance and corporate responsibility

NTT DATA, Inc. Enterprise AI Terms of Use

Key contents, objectives, and relevance to material impacts, risks and opportunities

The terms of use define permitted and restricted use of approved enterprise AI environments within NTT DATA, Inc. with regard to:

- Preventing the misuse of AI tools
- Protecting confidential, client and consumer data
- Ensuring the lawful, ethical and secure use of AI generated content

Material impacts, risks and opportunities addressed

- Reduces risk of consumer data exposure or misuse
- Supports secure and compliant AI assisted productivity
- Enables safe adoption of AI tools for service delivery

Scope of the policy and affected stakeholders

Own operations

Authorized NTT DATA, Inc. employees only

Downstream impact

Protects consumers and end users indirectly affected by AI assisted work outputs

Geographical scope

Global

Affected stakeholders

Consumers, end users, clients, employees

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2.2.3. Actions

[S4 MDR-A]

Key actions implemented in the reporting year

During FY25, NTT DATA, Inc. implemented the following actions aligned to approved policies and governance artifacts:

- Rolled out employee requirements and guidance for responsible use of AI tools in line with the AI Use Policy and tool-specific terms of use (for enterprise AI environments such as Copilot and ChatGPT Enterprise), including data protection, confidentiality, intellectual property, human oversight expectations and explicit nontraining assurances.
- Embedded AI-related risk considerations into internal governance and risk management activities to support alignment with the Group AI Risk Management Policy and the ethical principles set out in the NTT Group AI Charter.
- Reinforced responsible handling of information assets and ethical conduct expectations through the Code of Business Ethics and related enterprise compliance mechanisms, ensuring that all AI use is consistent with group-wide ethical standards.

[1]NTT Group AI Charter; NTT DATA Group AI Risk Management Policy; NTT DATA, Inc. AI Use Policy; NTT DATA, Inc. Microsoft Copilot Terms of Use; NTT DATA, Inc. ChatGPT Enterprise Terms of Use; NTT DATA Code of Business Ethics

Planned actions for next reporting year

- **Ongoing adoption and awareness** activities to improve consistent policy adherence.
- **Strengthening monitoring and reporting of AI-related risks and issues** in line with the Group AI Risk Management Policy.
- **Developing and introducing additional governance artifacts, together with maturing AI governance frameworks and a maturing AI management system (AIMS),** providing a structured, end-to-end approach to operationalizing responsible AI across the organization. These include:
  - **AI governance frameworks,** progressively maturing to define common principles, roles, decision rights, lifecycle controls, escalation paths and assurance mechanisms for AI use across the enterprise.
  - **A maturing AI management system (AIMS)**, informed by internationally recognized practices (for example ISO/IEC 42001 concepts), to increasingly formalize AI governance processes, controls, accountability, documentation, monitoring and continual improvement across the AI lifecycle.
  - **Governance of large language models (LLMs)**, including dedicated LLM-specific policy guidance (where required) and terms of use for approved and permitted LLMs, clarifying acceptable use, data handling, transparency expectations and user responsibilities.
  - **AI risk assessment mechanisms**, applied independently of LLM-specific policies in accordance with the Group-level AI risk management approach, and proportionate to the nature, scale and risk profile of the AI use case and its intended use.
  - **Contractual and legislative guidance embedded into governance artifacts and operating procedures** to ensure that AI use is consistent with applicable laws, regulatory requirements, contractual obligations and client-specific terms (including data-protection, confidentiality, intellectual-property and liability considerations).

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Expected outcomes

Current outcomes (FY25)

- Improved consistency in the responsible use of AI tools by employees, supported by the NTT DATA, Inc. AI Use Policy, tool-specific terms of use (Microsoft Copilot and ChatGPT Enterprise), and reinforced by the ethical principles set out in the NTT Group AI Charter.
- Enhanced organizational understanding of responsible technology and AI ethics through the embedding of risk considerations, ethical conduct and compliance mechanisms across internal operations.
- Better visibility and management of AI-related risks, enabled by the Group-level AI Risk Management Policy and operational controls at tool and process level.

Planned outcomes (forward-looking)

- Progressive maturity of AI governance frameworks and the AI management system (AIMS), providing structured, end-to-end oversight, lifecycle controls and continual improvement for responsible AI use.
- Clear separation and alignment of AI governance frameworks, LLM-specific governance, risk assessment mechanisms, and contractual/ legislative guidance, ensuring that all AI use is compliant, auditable and proportionate to risk and impact.
- Increased employee confidence and compliance through differentiated terms of use and policy guidance for approved AI tools, minimizing the risk of inappropriate data use or misunderstanding of AI output.
- Improved ability to demonstrate responsible AI implementation to auditors, regulators and stakeholders by evidencing both policy-level commitments and operational controls applied at technology and process level.
- Continued improvement in regulatory and audit readiness as AI-related requirements evolve, supported by transparent alignment between Group ethics commitments, enterprise risk governance and tool-specific usage rules.

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2.2.4. Targets

[S4 MDR-T]

Relationship of the target to its policy objectives and actions

The target supports the objectives of the NTT DATA Group AI Risk Management Policy and the NTT DATA, Inc. AI Use Policy by driving the consistent, proportionate oversight of internal AI use and compliant employee use of AI tools.

The target is supported by the actions described in Section 2.2.3, which include:

- Employee guidance
- Integration into governance and risk management activities
- Monitoring and reporting
- The planned introduction of AI governance frameworks that operationalize ethical principles, define decision rights and provide lifecycle-based oversight for internal AI use cases, alongside LLM-specific governance artifacts and independent AI risk assessment mechanisms

→ **Section 2.2.3: Actions**
[S4 MDR-A]

Defined target value (absolute/relative; unit)

Target value

100% coverage of in-scope internal AI use cases through defined AI risk and ethics oversight

Absolute/relative

Absolute

Unit of measure

Percentage of identified in scope internal AI use cases that are subject to the defined governance and risk controls

Scope of the target (operations/value chain; geography)

Operations

Applies to NTT DATA, Inc.’s own operations, covering internal AI systems, tools and internal AI use cases

Value chain

- Does not extend to upstream or downstream value-chain activities beyond NTT DATA, Inc.’s internal operations
- Excludes AI solutions developed exclusively for clients and operated under client governance frameworks

Geography

Global (all NTT DATA, Inc. geographies).

Baseline value and base year

Base year

FY25

Baseline value/level

FY25 is the baseline period during which the in-scope AI use-case inventory and oversight coverage are being established. A single consolidated numeric baseline percentage is not formally defined in this response; progress measurement is based on the proportion of identified in-scope internal AI use cases covered by oversight mechanisms.

Target year/period and interim milestones

Target year

FY27

Interim milestones/targets

No separate quantified interim targets are stated here. Progress is reviewed at least annually through incremental maturity improvements, including expanded identification of in-scope AI use cases and expansion of oversight coverage.

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Methodologies, significant assumptions, legal requirements, scenarios/data sources and policy-goal compatibility

Methodology

Risk-based governance approach aligned to the Group-level AI risk management approach.

Significant assumptions

1. An internal inventory of in-scope AI use cases can be maintained and updated.
2. Oversight mechanisms can be applied proportionately to risk.
3. Adoption and compliance can be increased through policy-aligned enablement.

Required by law

Not currently required by law; it is set to support regulatory readiness as AI-specific regulations and assurance expectations evolve.

Data sources (for measurement)

Internal records of identified in-scope AI use cases and governance/oversight evidence (for example, documented approvals and assessments and reporting artifacts), where available.

Compatibility with policy goals

The approach reflects internationally recognized responsible-AI policy goals and principles (for example, OECD AI Principles) and concepts reflected in frameworks such as the NIST AI Risk Management Framework and ISO/IEC 42001.

NIST: National Institute of Standards and Technology

Scientific basis (environmental topics only)

Not applicable. This target relates to governance, ethics and risk management rather than environmental topics and is therefore not based on conclusive scientific evidence.



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2.2.5 Case studies

NTT DATA Global New Technology Acquisition Process

In FY25, NTT DATA, Inc. applied responsible technology and AI ethics principles to the operation of the Global New Technology Acquisition Process (GNTAP), a mandatory governance mechanism for the assessment and approval of new technology and AI-enabled solutions that are used within the company.

Under GNTAP, proposed technologies and AI use cases are required to undergo structured, cross-functional review before approval, ensuring alignment with enterprise architecture standards, ethical principles, legal and regulatory obligations, data protection requirements, and security and sustainability controls.

For AI-enabled initiatives, this includes the explicit assessment of AI usage, risk profile, data handling and governance classification, as well as coordination with sustainability, data privacy, security architecture, legal and vendor risk reviews.

A practical example during FY25 was the review of internal AI initiatives submitted through GNTAP, where use cases were evaluated for appropriate human oversight, data minimization, anonymization and transparency controls prior to proof of concept or broader deployment. In one case, governance reviews confirmed that privacy-preserving design measures (including anonymization thresholds and restricted access) were implemented before approval to proceed.

Through GNTAP, we aim to ensure that responsible technology principles are applied consistently, preventing ungoverned AI adoption, identifying and mitigating ethical and compliance risks early in the lifecycle, and establishing clear accountability and approval conditions for AI use.

This process supports responsible innovation by balancing speed of delivery with risk management, regulatory readiness and stakeholder safeguards across our global operations.

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2.3. Sustainable Supply Chain

This material topic recognizes the need to build more sustainable and resilient supply chains while reducing environmental impact and respecting the human rights of workers across the value chain. Our approach focuses on supplier governance, risk monitoring, corrective support, capacity-building and the use of technology to improve transparency and strengthen responsible sourcing practices.

As supply chains face growing environmental, social and operational pressures, we are embedding sustainability, resilience and human rights considerations more deeply into supplier management and decision-making. This includes identifying and monitoring supplier risks, supporting corrective action and strengthening expectations for responsible business conduct.

We also aim to work with suppliers and partners to improve performance across the value chain, using our capabilities, partnerships and technology solutions to increase transparency, support continuous improvement and reduce risk over time.

2.3.1. Policy

[S2 MDR-P, S2-1, S2-3]

Policies to manage material impacts, risks and opportunities related to value chain workers

NTT DATA, Inc. maintains several policies and guidelines that set expectations for responsible business conduct, human rights and labor practices across its value chain.

These include the publicly available NTT DATA Group Guidelines for Sustainability in the Supply Chain, and the NTT DATA Code of Business Ethics. Together, these documents outline requirements relating to ethical conduct, fair and safe working conditions, respect for human rights and responsible environmental and social practices across the supply chain.

→ **NTT DATA Group Guidelines for Sustainability in the Supply Chain**

→ **NTT DATA Code of Business Ethics**

Supplier Standards and Principles

In FY25, NTT DATA, Inc. progressed the development of its Supplier Standards and Principles, which were formally approved in February 2026. These standards and principles set detailed expectations for suppliers, covering working conditions, forced and child labor, prohibited practices, nondiscrimination, environmental responsibilities, reporting and monitoring requirements and remediation obligations. They also define policy ownership, supplier responsibilities and an annual review cycle, strengthening our governance of supplier conduct.

Third-party Risk Management Policy

The management of supplier-related risks, including those affecting value chain workers, are governed by the Third-Party Risk Management (TPRM) Policy. The policy sets out a structured lifecycle for third-party engagement, planning, due diligence, inherent and residual risk assessment, monitoring, remediation and contracting, and defines formal governance roles across Board, Group and Unit levels. It is expected to strengthen due-diligence processes related to labor and human-rights risks in the supply chain.

Collectively, these policies form the basis for how NTT DATA, Inc. manages material impacts, risks and opportunities associated with value chain workers.

They articulate expectations for fair and safe working conditions, the protection of labor rights, ethical conduct and supplier accountability. As regulatory expectations evolve, NTT DATA, Inc. continues to assess opportunities to strengthen supporting processes, such as supplier acknowledgment, monitoring capabilities and the integration of labor-related considerations into third-party risk oversight, so that disclosures can expand in future reporting cycles as practice maturity increases.

NTT DATA, Inc. also recognizes that while the policy framework is established, consistent implementation evidence (including formal supplier acceptance, monitoring data and effectiveness indicators) remains limited at this stage and will be strengthened as underlying processes mature.

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Policies that explicitly address trafficking in human beings, forced labor or compulsory labor and child labor

NTT DATA, Inc. has policies and governance documents that explicitly prohibit trafficking in human beings, forced or compulsory labor and child labor across its value chain.

These expectations are set out in several publicly available Group-level policies, including:

- **NTT DATA, Inc. Modern Slavery Statement**, which outlines the organization's commitments to preventing human trafficking, forced labor, bonded labor and child labor across its operations and supply chain.
- **NTT DATA Group Guidelines for Sustainability in the Supply Chain,** which function as the Group's Supplier Code of Conduct and explicitly prohibit forced labor, compulsory labor, human trafficking and child labor, including practices such as document retention, coercion or other exploitative conditions.
- **NTT DATA Code of Business Ethics**, which reinforces commitments to human rights, ethical conduct and zero tolerance for labor exploitation.

→ **NTT Group Modern Slavery Statement**

→ **NTT DATA Group Guidelines for Sustainability in the Supply Chain**

→ **NTT DATA Code of Business Ethics**

In addition to these Group-level policies, NTT DATA, Inc. has an approved Supplier Standards and Principles document. This document is not a policy but a contracting and supplier requirements document used during supplier onboarding, contracting and ongoing supplier management. It operationalizes the commitments set out in Group policies by specifying detailed expectations for suppliers in relation to voluntary employment, humane treatment, prohibition of forced and child labor, working conditions, monitoring expectations and remediation requirements.

Collectively, these policies and contractual requirements apply to suppliers, subcontractors and third-party partners across NTT DATA's value chain.

They are aligned with internationally recognized frameworks, including the UN Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Core Conventions and the UN Convention on the Rights of the Child.

→ **UN Guiding Principles on Business and Human Rights**

→ **International Labour Organization**

→ **UN Convention on the Rights of the Child**

NTT DATA, Inc. continues to develop complementary processes to support the implementation of these commitments. Areas under review include formal supplier acknowledgment mechanisms, governance clarity, expanded monitoring and assessment capabilities, and improved evidence collection to demonstrate adherence. As these processes mature, NTT DATA, Inc. anticipates being able to expand disclosures on policy implementation and effectiveness in future reporting cycles.



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Supplier Code of Conduct

NTT DATA, Inc. adopts the NTT DATA Group Guidelines for Sustainability in the Supply Chain as its Supplier Code of Conduct.

This document sets out the Group's expectations for all suppliers regarding:

- Labor standards and human rights protections
- Prohibition of forced labor, child labor and trafficking
- Safe and fair working conditions
- Environmental responsibility
- Ethical business practices and anti-corruption
- Information security and data protection requirements

→ NTT DATA Group Guidelines for Sustainability in Supply Chain

Policies regarding protection against retaliation for individuals that use channels to raise concerns or needs

NTT DATA, Inc. maintains a global Speak Up and Whistleblowing Policy that applies to employees, contractors, suppliers, partners, clients and other third parties, giving value-chain workers direct access to protected reporting mechanisms.

The policy includes a strict nonretaliation commitment, ensuring that any individual who raises a concern in good faith is protected from retaliation, harassment, victimization or adverse treatment. Confidential and anonymous reporting options are available 24x7 through the online SpeakUp portal, mobile app and telephone hotline. These are confidential, independent and accessible channels for raising concerns related to unethical behavior, legal violations or breaches of policy. To support impartial and secure investigation processes, reports are managed centrally by the Group Compliance function

NTT DATA, Inc. continues to strengthen awareness and accessibility of its reporting mechanisms for value-chain workers. While the SpeakUp platform is available globally, efforts to enhance communication, improve supplier-level awareness and increase visibility of nonretaliation protections are ongoing. These improvements will help strengthen confidence and trust in grievance mechanisms in future reporting cycles.

→ SpeakUp: Reporting ethical concerns

→ NTT DATA SpeakUp and Whistleblowing Policy



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2.3.2. KPIs (non-financial indicators) and Targets

[S2 MDR-T]

NTT DATA, Inc. assesses suppliers requiring risk-based due diligence using a regulatory sustainability self-assessment questionnaire (SAQ) aligned with the Corporate Sustainability Reporting Directive (CSRD) requirements and the expectations of the Corporate Sustainability Due Diligence Directive (CSDDD).

This assessment is part of a harmonized NTT DATA Group methodology for identifying and assessing suppliers under the Group's A/B/C risk-based classification criteria, as defined in the NTT DATA Group Non-financial Indicators.

The KPI is defined by NTT DATA Group Corporation as the "percentage of suppliers requiring risk-based assessment with a valid regulatory sustainability SAQ by year-end."

The KPI is Board-endorsed and overseen by the Sustainability Committee under the Supply Chain Thematic Working Group (TWG).

The NTT DATA, Inc. basis of reporting provides the detailed methodology, covering KPI definition, data-collection processes, base-year logic, treatment of incomplete or partial submissions, and the rules for accepting third-party disclosures (EcoVadis, Carbon Disclosure Project (CDP)) as equivalent evidence.

Quality control follows a two-level review: first by the Procurement Sustainability CoE, and second by NTT DATA Group Corporation Procurement, ensuring consistency and auditability.

FY25 analysis

For FY25, NTT DATA assessed suppliers according to three criteria, and suppliers were flagged if at least two of the following applied:

1. Within suppliers covering 70% of global spend
2. Located in countries with extremely high human rights and/or environmental risk
3. Vendors handling conflict minerals

We identified 47 suppliers as requiring a regulatory sustainability assessment. Of these, 46 suppliers completed the regulatory SAQ or provided an accepted equivalent disclosure (EcoVadis or CDP), resulting in 97.87% coverage, significantly exceeding the Group-defined FY25 KPI target of 80% (with future targets of 90% for FY26 and 100% for FY27).

Risk-based supplier segmentation

NTT DATA, Inc. is developing a risk-based supplier segmentation approach intended to complement the Group's A/B/C criteria. The methodology uses defined risk indicators and threshold-based "flags" to highlight suppliers that may require enhanced due diligence and engagement. As this approach remains under review, its design and scope may evolve. If progressed further, it is expected to improve the consistency and transparency of identifying suppliers that may be in scope for regulatory sustainability SAQs in future cycles, supporting alignment with emerging CSRD and CSDDD expectations.



Overall, FY25 performance exceeded the established target (97.87% versus 80%), demonstrating a strong operational foundation and a well-governed methodology for risk-based supplier assessments. We will continue to refine our approach as regulatory expectations mature, strengthening and enhancing existing audit trail documentation, segmentation logic and internal controls to ensure continued readiness for CSRD-aligned assurance.

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2.3.3. Payment Practices

[G1-6]

NTT DATA, Inc. includes payment-term references in all purchasing agreement templates. This serves as the default starting point for supplier contracting and may be adapted to reflect local legal requirements or negotiated commercial arrangements.

To comply with statutory obligations and jurisdiction-specific regulations, including legislative requirements prescribing maximum payment periods or measures designed to support SMEs, actual payment terms vary by country. In certain markets, supplier agreements incorporate locally mandated terms to ensure alignment with national laws.

FY25 analysis

Based on available FY25 data, an initial analysis of suppliers with known payment terms indicates that approximately 98% operate in alignment with the contractual payment term approach. As payment term data is currently available for a subset of suppliers only, these figures are indicative and not yet representative of the full supplier base.

2.3.4. Payment practices: Reporting methodology and assumptions

[G1-6 MDR-M]

Payment-term metrics for FY25 are based on data extracted from purchase order (PO) and accounts payable (AP) systems. Standard payment terms are derived from the baseline payment term included in purchasing agreements. Actual applied terms may differ due to country-specific statutory requirements, regulatory mandates on maximum payment periods, or negotiated contractual conditions.

FY25 analysis

NTT DATA, Inc. does not yet maintain a formally defined set of standard payment terms by major supplier category. As a result, the FY25 analysis uses the actual payment terms available within the PO/AP systems rather than category-specific baselines. Data completeness varies across regions due to fragmented systems, and gaps exist where category classifications or contractual payment-term fields are missing or incomplete.

Given these constraints, FY25 figures rely on the best available system data, and, due to the current level of data completeness, the results should be considered indicative.

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2.3.5. Case studies

NTT DATA Procurement Sustainability Center of Excellence

In FY25, NTT DATA, Inc. launched the Procurement Sustainability Center of Excellence (CoE) to support the integration of sustainability principles across procurement. The CoE provides guidance, tools, training and governance to embed sustainability into supplier lifecycle management, including sourcing decisions, contracting, onboarding and ongoing supplier engagement.

The CoE brings together representatives from multiple regions and procurement functions, operating under executive sponsorship and aligned to Group-level sustainability governance.

Key activities in FY25

- Strengthening supplier sustainability assessments
- Supporting the rollout of risk-based due diligence
- Developing materials to engage suppliers on sustainability topics
- Coordinating the internal sustainability working group responsible for advancing sustainable procurement practices globally

Key achievements in FY25

- Launched a supplier engagement program, “Aligning ambitions to net-zero,” to strengthen collaboration with suppliers on decarbonization and broader sustainability priorities
- 40+ suppliers engaged through targeted meetings to inform Scope 3 decarbonization planning
- Sustainability is increasingly reflected as a standing agenda item on business reviews

Supplier sustainability assessments

- NTT DATA, Inc.: 128 suppliers assessed (approximately 98% of FY managed spend), with a 93% response rate
- NTT DATA Group: High-risk supplier cohort of 47 suppliers identified, 46 completed SAQs or accepted equivalents, with a 97.87% completion rate
- Demonstrated strong operational maturity and supplier responsiveness
- Corrective and preventive action (CAPA) engagement
- 12 suppliers engaged on corrective and preventive action measures with scheduled checkpoints
- Groundwork established for broader CAPA governance rollout in FY26

New tools and visibility mechanisms

- 51 Supplier Scorecards developed to improve transparency and support more evidence-based supplier performance conversations
- Supplier Risk Tracker Dashboard piloted to centralize and monitor sustainability risk indicators
- Tools contributed to more consistent risk-based prioritization and informed supplier dialogue

Overall impact

- Established the foundation for integrated sustainable procurement
- Strengthened regulatory-aligned due diligence capability
- Improved supplier participation and visibility of sustainability performance
- Enabled coordinated multiregional engagement and capability building
- Positioned procurement to scale sustainability initiatives further in FY26

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Case studies

Supplier engagement on sustainability

In FY25, NTT DATA, Inc. conducted a sustainability engagement with priority suppliers that were selected based on their materiality, risk-based segmentation and contribution to upstream Scope 3 emissions.

These suppliers represent a significant portion of NTT DATA's environmental footprint, particularly in purchased goods and services.

Focus of the engagement

The engagement focused on decarbonization pathways, emissions transparency, circularity, sustainability governance and capability building across the supply chain. Through the engagement, we gained greater clarity and understanding of supplier sustainability maturity levels and important gaps that influence upstream challenges.

What we learned

Several suppliers shared granular emissions data, including entity-level Scope 1 to 3 figures. A subset have started shifting from spend-based to activity-based emissions reporting and expanding product carbon footprint (PCF) availability, improving the precision of early Scope 3 modeling efforts.

The engagement also indicated stronger alignment with recognized frameworks such as SBTi, CDP and EcoVadis, with a portion of suppliers maintaining validated science-based targets and others progressing to near-term submissions.

However, a large share of suppliers remain in the early stages of readiness, with many not yet disclosing Scope 3 data, raising concerns about data completeness, accuracy and comparability, and expressing uncertainty regarding upcoming methodological changes. Circularity practices and lifecycle-management maturity also varied widely, and several midtier suppliers continued to rely on consolidated group-level emissions rather than product- or entity-specific data.

Benefits of the engagements

Through these engagements, we:

- Strengthened collaboration on decarbonization pathways, lifecycle emissions and circularity
- Improved the clarity and consistency of reported data through shared methodology discussions
- Established expectations for recurring sustainability conversations, including in business reviews
- Gained critical visibility of gaps that will inform capability building and prioritization in FY26



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2.4. Digital Safety and Reliability

This material topic recognizes the importance of maintaining secure, stable and resilient digital infrastructure as society becomes increasingly dependent on technology-enabled services. Our approach focuses on prevention, preparedness, responsiveness and continuous improvement to support reliable service delivery across critical systems and operations.

As digital infrastructure becomes more central to everyday life, business continuity and social infrastructure, we are strengthening the systems, controls and investments needed to prevent service disruption. This includes building robust management systems, improving IT resilience and taking proactive measures to reduce operational and security risks.

When failures do occur, we aim to respond quickly, restore services safely and identify root causes to prevent recurrence. We also help clients strengthen digital safety and reliability through secure, resilient technology solutions that support continuity, trust and long-term service stability.

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2.4.1. Policies

[S4 MDR-P]

The NTT DATA, Inc. Office of Information Security maintains an integrated Information Security and Privacy Management Framework aligned to ISO 27001, ISO 27701 and SOC2 Type II, designed to manage material impacts, risks and opportunities related to consumers and end users.

Integrated Information Security and Privacy Management Framework

Key content and objectives

The framework is operationalized through five core security functions:

1. **Identity and access management (IAM)**
   Enforcing least privilege, multifactor authentication and zero trust principles
2. **Threat detection and response**
   Continuous monitoring, event correlation and incident response
3. **Vulnerability and endpoint management**
   Identification, prioritization and remediation of vulnerabilities
4. **Data protection and privacy**
   Data classification, encryption and privacy controls aligned to GDPR
5. **Network and secure access**
   Secure connectivity and protection of distributed environments

These security functions aim to:

- Protect the confidentiality, integrity and availability of data and systems
- Prevent cyberincidents that affect consumers and end users
- Ensure resilient and secure service delivery

Scope

Operations
All internal and managed service environments

Value chain
Suppliers and third-party service providers

Geographies
Global, aligned with EU regulatory expectations

Stakeholders
Clients, end users, regulators and partners

Standards referenced

- ISO 27001, ISO 27701
- SOC2 Type II
- NIST Cybersecurity Framework
- General Data Protection Regulation (GDPR) and applicable EU cybersecurity regulations



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2.4.2. Action plans

[S4 MDR-A]

In FY25, the NTT DATA, Inc. Office of Information Security implemented several initiatives to strengthen digital safety and reliability.

Key actions (FY25)

- Expansion of zero trust identity controls and nonhuman identity governance
- Enhancement of security monitoring and incident response capabilities
- Continuous vulnerability scanning and remediation programs
- Strengthening of data discovery, classification and protection controls
- Deployment of secure remote access and network protection capabilities
- Introduction of controls to monitor and manage emerging AI-related risks

Expected outcomes

- Reduction in cybersecurity incidents affecting customers and end users
- Improved service resilience and availability
- Enhanced regulatory compliance and privacy protection
- Strengthened digital trust and secure service delivery

2.4.3. Target/KPI

[S4 MDR-T]

The NTT DATA, Inc. Office of Information Security maintains targets designed to strengthen digital safety, service reliability and resilience across its technology services and managed environments.

Key objectives include:

- Continuous improvement of security posture through the adoption of globally recognized standards such as ISO/IEC 27001, ISO/IEC 27017 and ISO/IEC 27018
- Reduction of critical service disruptions and security incidents through enhanced monitoring, automation and incident response capabilities
- Improved system resilience and availability, supported by defined service reliability metrics and operational resilience frameworks
- Expansion of secure development practices across product and service lifecycles

Targets are supported by governance oversight from security, risk and technology leadership teams and are embedded in operational performance metrics and risk management frameworks.

The NTT DATA, Inc. Office of Information Security establishes targets to monitor progress against digital safety and reliability objectives.

Target areas

- **Identity security**
  Increase coverage of strong authentication and zero trust controls
- **Threat response**
  Reduce mean time to detect and respond to incidents
- **Vulnerability management**
  Improve remediation timelines for critical vulnerabilities
- **Data protection**
  Increase coverage of classified and protected sensitive data
- **Service resilience**
  Maintain high availability aligned to service commitments

Targets apply across NTT DATA's global operations and cover internal systems, client platforms managed by NTT DATA, and relevant supplier environments.

- **Scope**
  Global operations and managed client environments
- **Timeframe**
  Annual targets with continuous improvement
- **Methodology**
  Based on operational metrics, audits and risk assessments
- **Alignment**
  Consistent with ISO standards and EU regulatory expectations

Progress is measured through internal risk management processes, security monitoring platforms and audit activities.

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2.4.4. Case study

Enhancements to NTT DATA security operations centers (SOCs)

In FY25, the NTT DATA, Inc. Office of Information Security strengthened its global cybersecurity monitoring and incident response capability by enhancing its security operations centers.

Improvements made

- Deployment of enhanced threat intelligence integration
- Automation of security event correlation and response workflows
- Integration of advanced analytics for anomaly detection

Measurable improvements

- Faster detection and response times for security incidents
- Improved visibility of managed infrastructure and cloud environments
- Enhanced protection for client systems and digital services

This initiative, overseen by cybersecurity leadership teams and integrated into enterprise risk management processes, demonstrates NTT DATA's commitment to maintaining secure, resilient digital services for clients and end users.

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2.5. Secure and Sustainable-by-design Services and Solutions

This material topic recognizes the importance of secure and sustainable-by-design services and solutions in meeting clients' expectations for systems that are safe, reliable and responsibly operated. Our approach focuses on integrating security and sustainability considerations from the design stage onward to support resilient, trusted and future-ready systems.

As clients face growing security, regulatory and sustainability demands, we are strengthening how these principles are embedded into our products, services and consulting practice. This includes designing, implementing and operating secure systems that help clients manage risk, protect data and improve long-term resilience.

We also aim to help clients improve both security and sustainability through technology solutions and advisory services that enable safer operations, support responsible system design and contribute to more resilient business outcomes.

2.5.1. Secure-by-design policies

[S4 MDR-P]

The NTT DATA, Inc. Office of Information Security embeds secure-by-design and privacy-by-design principles into all systems and services. Security and privacy controls are integrated throughout the lifecycle (design, build, deploy, operate), and risks such as data exposure, system vulnerabilities, and service disruption are addressed proactively.

These principles apply to all internal systems, client solutions and third-party integrations. They align with the:

- ISO 27001 control framework
- ISO 27701 privacy controls
- Secure development standards (for example, NIST guidance)
- GDPR principles

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2.5.2. Secure-by-design target/KPI (non-financial indicators)

[S4 MDR-T]

The NTT DATA, Inc. Office of Information Security promotes secure-by-design principles in both technology development and service delivery.

Targets include:

- Integrating security requirements into all stages of the software and service lifecycle
- Increasing the adoption of secure coding and architecture review practices
- Ensuring solutions undergo security testing, vulnerability management and risk assessments before deployment
- Embedding privacy and security controls by default in digital services

These targets support the delivery of trustworthy, resilient technology solutions for clients.

The NTT DATA, Inc. Office of Information Security aims to expand the adoption of secure-by-design practices across its global technology services.

Targets include:

- Increasing the proportion of solutions developed under secure development frameworks
- Strengthening vulnerability management and improving remediation timelines
- Enhancing monitoring and resilience capabilities across client environments

Progress is tracked through internal governance processes, security assessments and risk reporting mechanisms.

Scope
All new and materially updated systems

Baseline
Internal benchmarks

Timeframe
Annual improvement cycles

Methodology
Based on security testing results and audit findings

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2.5.3. Case study

Security transformation through NTT DATA, Inc. Office of Information Security

In FY25, the NTT DATA, Inc. Office of Information Security implemented a security transformation initiative, based on its five core functions, to:

1. Strengthen identity and access controls using zero trust principles
2. Enhance threat detection and response capabilities
3. Improve vulnerability and endpoint management processes
4. Expand data protection and privacy controls
5. Secure network access across distributed environments

Outcomes

- Improved visibility of users, systems and data flows
- Reduced risk of unauthorized access and data breaches
- Enhanced incident response efficiency
- Strengthened protection of consumer and end-user data

Governance

- Aligned to ISO 27001 information security management system (ISMS)
- Supported by SOC 2 Type II assurance
- Privacy aligned with ISO 27701 and GDPR

SOC 2: System and Organization Controls for Service Organizations

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Spanish Ministry for the Ecological Transition and the Demographic Challenge “Spanish National Water Observatory”

A real-time data platform to support strategic decisions, improves transparency and helps to anticipate issues.

The effective control and management of water in Spain remains a constant challenge, primarily due to the fragmented nature of hydrological and water-consumption data at a territorial level. NTT DATA is working to enhance decision-making and transparency in water management by digitalizing water data, ensuring the availability and quality of water resources.

Digital transformation of water management

NTT DATA developed an advanced platform that centralizes and visualizes hydrological and water-consumption data in real time. It integrates advanced analytics, data automation and real-time hydrological alerts, optimizing decision-making and response capacity.

This innovative solution offers a unified and intelligent view of the water cycle, enabling efficient, transparent and data-driven management. Connected with networks such as AEMET and Copernicus, it enables the comparison of real consumption by territory and source, promoting efficient and sustainable water management.

AEMET: Agencia Estatal de Meteorología (State Meteorological Agency)

Outcomes

The project achieved the following results:

- Centralized and real-time management of water information through a single national portal
- Forecasting and intelligent data analysis to support better decision-making in response to extreme hydrological events
- Greater accessibility and transparency regarding the hydrological situation, water consumption and discharges into the natural environment
- Promotion of nonconventional water resources, fostering reuse and desalination
- Continuous monitoring of management indicators, enhancing efficiency, sustainability and resilience in the use of water resources

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Case studies

ICT Carbon Insights

NTT DATA's Global Sustainability team and Global IT have designed and deployed the ICT Carbon Insights Platform as a foundational element of their Sustainable IT strategy and Net-Zero 2040 Vision.

ICT is a growing source of greenhouse gas emissions and electronic waste, yet most organizations still lack consistent, decision-grade data on the carbon impacts of their technology estates. Fragmented measurement across applications, data centers, networks, hardware, cloud and end-user devices made it difficult to establish a reliable baseline, identify priorities and make informed decisions on how to reduce environmental impact while maintaining operational performance.

To address this, NTT DATA is implementing a single, vendor-neutral ICT Carbon Insights Platform that applies a science-based methodology to the full technology landscape, combining lifecycle assessment, application-level software carbon intensity, standards-aligned emissions accounting and deep reference data to quantify both operational and embodied emissions. Through integrations with systems such as ServiceNow CMDB, ESG platforms and FinOps tools, the platform embeds trusted sustainability insights into the tools teams already use, enabling decisions such as workload placement, hardware lifecycle extension, energy-efficient design and more sustainable procurement.

Outcome: Greater visibility, stronger decision-making and a clearer pathway to decarbonizing the IT estate

By establishing a trustworthy baseline and common language for action, Global IT can identify inefficiencies, reduce energy use and related costs, extend device lifecycles, and improve the quality and auditability of sustainability disclosures. The platform also strengthens stakeholder trust by supporting compliant, reporting-ready insights, while helping embed lower-carbon decision-making into planning, procurement and day-to-day operations rather than treating decarbonization as a one-off initiative.

Just as importantly, NTT DATA's "client zero" deployment demonstrates the solution at global scale and creates a repeatable blueprint for our clients and partners. By proving the approach internally, we are turning measurement into decision intelligence and building a managed service opportunity that can be extended across industries. This positions the ICT Carbon Insights Platform not only as an internal enabler of sustainable IT but also as a differentiated market offering that supports client emissions reduction, strengthens credibility, and contributes to wider climate and resource stewardship goals



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NTT DATA Business Solutions

NTT DATA Business Solutions has a range of resilient infrastructure and cloud services that support continuity and performance under climate and energy stress. We also enable trend analysis, forecasting and informed responses through data, monitoring and predictive intelligence solutions, and apply IoT to increase real-world resilience to climate impacts with solutions built on our green-software-based momentum platform.

Carbon optimization services for hyperscalers

These services reduce dependency on energy-intensive configurations and their exposure to energy-price volatility by optimizing compute, minimizing data transfer and selecting efficient storage options.

Managed Cloud and Data Center Services

Redundancy, monitoring, backup and disaster-recovery mechanisms ensure business continuity during physical disruptions (for example, extreme weather, outages).

Sustainability Data Simplified (SDS)

This solution supports data-driven decision-making for climate-related risks (supply chain disruption, regulatory changes) through continuous KPI monitoring and analysis (for example, product carbon footprint (PCF)).

Corporate Carbon Calculator for Midmarket

Emissions tracking, trend analysis and forecasting across Scope 1 to 3 enables scenario-based planning for considerations such as transition risks and carbon cost exposure.

Sustainable Smart Building Hub

This solution supports climate adaptation and operational resilience through real-time monitoring, early-warning systems (for example, leak and flood detection), and AI-driven optimization of energy and building operations.

Smart Communities and Tourism solutions

These solutions support resilience planning in cities and destinations by integrating IoT, mobility and environmental data and predictive analytics, including insights into visitor flows, energy demand and congestion.

osapiens and SAP standard solution deployment

Through this service, we help clients address regulatory compliance and improve supply chain transparency to support informed decision-making related to compliance, supply chain resilience, emissions management and energy efficiency.

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Case studies

NTT Global Data Centers

In FY25, NTT Global Data Centers updated and standardized a common set of globally applicable Owner's Product Requirements (OPR), together with an associated Global Reference Design incorporating best practices and high standards.

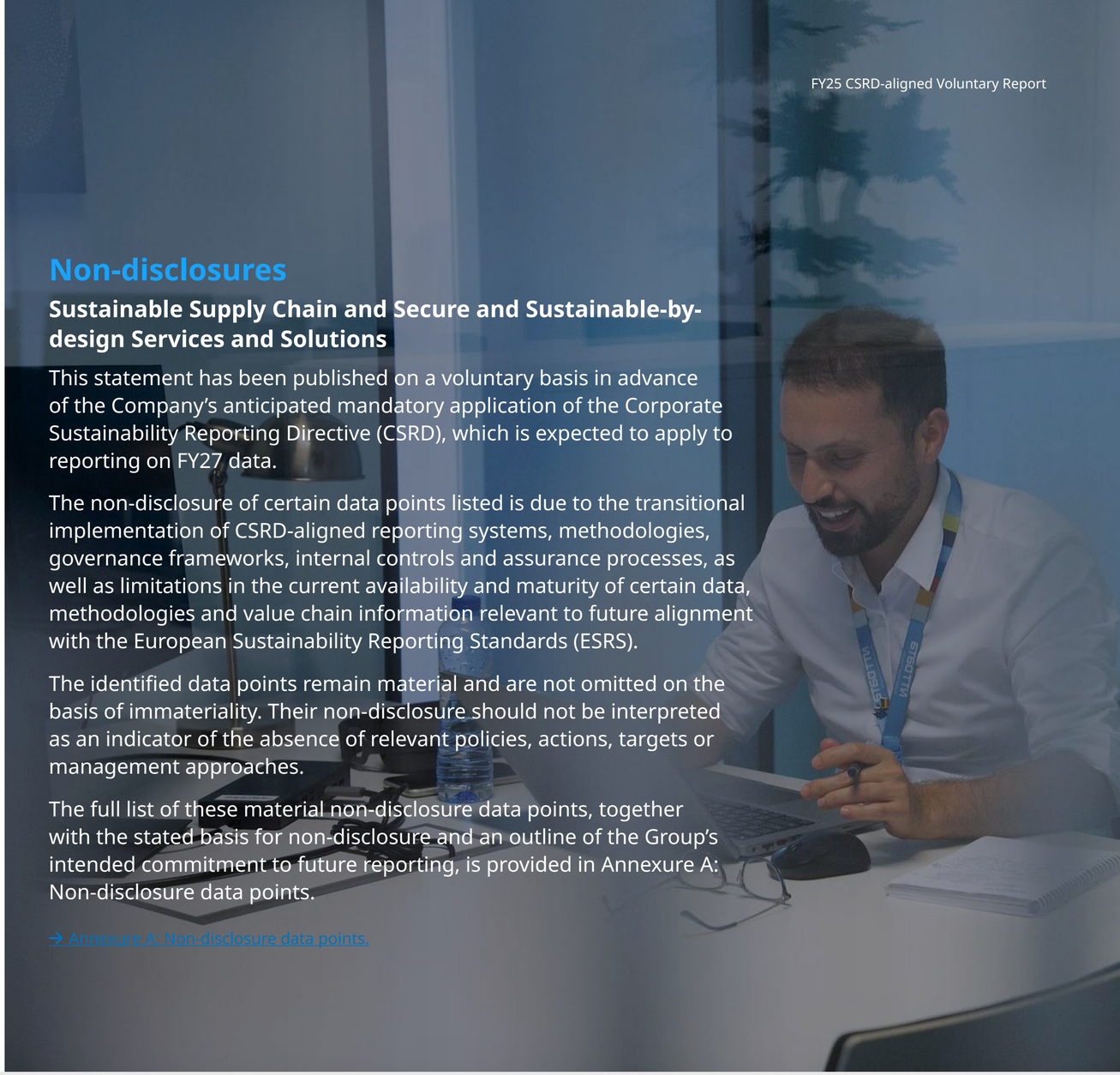
These are based on NTT commitments, LEED recommendations, the EU Code of Conduct for Energy Efficiency and other globally recognized and respected sources.

The reference design includes dry, nonevaporative heat rejection, with water use kept to a minimum and limited to humidification during winter months. Cooling equipment is sized with resilience in mind, based on ASHRAE's 50-year worst case temperatures, with an additional margin to ensure continued operation under more extreme conditions.

Lifecycle carbon assessments (LCA) are now a standard deliverable for all new projects.

In addition to technical engineering performance requirements, the OPR includes people-focused features such as mother's rooms, multifaith quiet spaces and external wellness gardens. These are now standard features, supporting our employees' wellbeing.

ASHRAE: American Society of Heating, Refrigerating, and Air-Conditioning Engineers
LEED: Leadership in Energy and Environmental Design



Non-disclosures

Sustainable Supply Chain and Secure and Sustainable-by-design Services and Solutions

This statement has been published on a voluntary basis in advance of the Company's anticipated mandatory application of the Corporate Sustainability Reporting Directive (CSRD), which is expected to apply to reporting on FY27 data.

The non-disclosure of certain data points listed is due to the transitional implementation of CSRD-aligned reporting systems, methodologies, governance frameworks, internal controls and assurance processes, as well as limitations in the current availability and maturity of certain data, methodologies and value chain information relevant to future alignment with the European Sustainability Reporting Standards (ESRS).

The identified data points remain material and are not omitted on the basis of immateriality. Their non-disclosure should not be interpreted as an indicator of the absence of relevant policies, actions, targets or management approaches.

The full list of these material non-disclosure data points, together with the stated basis for non-disclosure and an outline of the Group's intended commitment to future reporting, is provided in Annexure A: Non-disclosure data points.

→ Annexure A: Non-disclosure data points.

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People Positive



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Introduction to People Positive

Materiality	Indicators
People-centric Company	Percentage of employee engagement
Diversity & Inclusion	Percentage of female managers
Health and Safety	Number of fatal accidents
Human Rights	1. Due diligence implementation 2. Establishment of grievance mechanisms
Digital Accessibility	Number of people impacted by our digital accessibility solutions, technical skills training and outreach programs



Shape a better world for all, applying our digital capabilities to improve livelihoods and contribute to an inclusive society.

Global societal challenges, evolving workforce expectations and access to digital opportunities require inclusive, human-centered approaches to business. As a global IT and services provider, we leverage our digital capabilities to empower people, uphold fundamental rights, and create safe, inclusive and accessible environments across our operations and value chain.

This chapter outlines our approach to five material topics:

1. People-centric Company
2. Diversity and Inclusion
3. Health and Safety
4. Human Rights
5. Digital Accessibility

3.1. People-centric Company

This material topic recognizes the importance of people as a core driver of long-term value, and the need to create an environment where employees can develop, contribute and thrive. Our approach focuses on attracting talent, supporting skills development and strengthening workplace practices that enable both individual growth and organizational resilience.

As the demand for new skills continues to evolve, we are investing in capability building, employee development and work environments that help our people grow with the business. This includes improving workplace systems and practices, supporting flexible and inclusive ways of working, and enabling employees to build the skills needed for current and future roles.

We also aim to strengthen our people-centric culture by creating opportunities for continuous learning, career development and meaningful contribution, helping employees realize their potential while supporting long-term business resilience.

3.1.1. Policy

[S1-3]

NTT DATA, Inc. adheres to the Group-wide SpeakUp & Whistleblowing Policy, which is designed to enable employees and other eligible parties to raise concerns safely, confidentially and without fear of retaliation. This policy supports the early identification and mitigation of potential misconduct and contributes to a trustworthy, respectful working environment.

→ SpeakUp and Whistleblowing Policy

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Awareness and trust in reporting channels

Our SpeakUp & Whistleblowing Policy establishes that each Group company is responsible for implementing and operating a whistleblowing system consistent with the Group policy (or may delegate operation to the Group or relevant business unit). This approach is intended to make reporting channels accessible and reliable across the organization. The whistleblowing system and associated reporting mechanisms are available to directors, officers, employees, contractors and suppliers.

The policy allows concerns to be raised anonymously or with identifying information, enabling confidentiality while promoting effective handling and investigation where possible. It also provides for feedback to whistleblowers in response to their report (with limited exceptions), supporting transparency and trust in the process.

Protection against retaliation

NTT DATA is strongly committed to protecting whistleblowers. The policy explicitly prohibits intimidation, discrimination, dismissal, or retaliation against individuals who raise concerns in good faith. The policy also reinforces confidentiality requirements, limiting access to reported information to those specified under each company's rules, and restricting use of information to defined purposes.

To safeguard fairness and independence, the policy requires that the person who is the subject of a report is not involved in the response process, and it highlights attention to conflicts of interest in handling reports. Where retaliation occurs, the policy provides that disciplinary action may be taken against individuals who retaliate against or harass whistleblowers, in line with applicable employment rules and contracts.

Continuous improvement

The policy is maintained and updated to ensure its continued relevance and alignment with Group requirements, including updates to reflect the NTT DATA Code of Business Ethics.

3.1.2. KPIs (non-financial indicators)

Table 7: People-centric Company KPIs

KPI	FY24	FY25
Employee engagement	75.60%	75.30%
Voluntary attrition	13.8%	12.8%

3.1.3. Targets

[S1 MDR-T]

NTT DATA has established an outcome-oriented target to strengthen workforce engagement, supporting talent retention, performance and a resilient corporate culture. The target is managed through a consistent, auditable methodology designed to ensure reliable non-financial reporting and support coherent sustainability disclosures.

Employee engagement

Relationship to policy objectives and actions

This target supports the objectives of the People-centric Company material issue by enabling NTT DATA to measure, manage and continuously improve employee engagement using a consistent methodology and defined reporting controls. It is underpinned by annual engagement surveys and a structured data collection and calculation approach to support transparency and reliability in reporting.

Target value, type and unit

Target
Year-on-year (YoY) improvement in employee engagement (FY25)

Type
Relative (YoY improvement rather than a fixed absolute value).

Unit
Percentage (%)

Scope

Organizational scope
The engagement indicator scope is defined as all employees of NTT DATA, Inc., excluding contingent workers.

Geographical boundary
The reporting boundary covers NTT DATA, Inc. regions (Europe, IBIOL, MEA, APAC and North America) and global units (Global Data Centers and Connectivity; Business Solutions; Technology Solutions, and Cloud and Security), using a financial control approach for organizational boundary definition.

Value chain

This target relates to our own workforce (not upstream/downstream).

Baseline value and base year
2024

Target year, period and milestones

Target period

FY25 for YoY improvement

[2]IBIOL Iberia, International Organizations, LATAM and Consulting in Benelux and France

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Mid- to long-term direction

Achievement of the target set in FY25 is referenced for the mid to long term.

Methodologies, assumptions and alignment

[S1-6 MDR-M]

Methodology

Employee engagement is calculated as the average positive response rate of four survey KPIs:

1. “My work gives me a feeling of personal accomplishment.”
2. “I would recommend this company as a good place to work.”
3. “This company motivates me to contribute more than is normally required to complete my work.”
4. “I am proud to work for our company.”

Calculation approach

For each question, the average positive response rate is calculated by dividing the total number of positive responses by the total number of responses.

The final engagement score is the average of the four positive response rates derived from the annual engagement survey.

Assumptions and data governance

The basis of reporting is designed to ensure consistency, transparency, reproducibility and the ongoing improvement of our data collection and calculation methodologies.

[2]IBIOL: Iberia, International Organizations, LATAM and Consulting in Benelux and France

3.1.4. Characteristics of our employees

[S1-6]

Table 8: Number of employees

Units	Regional units													Group functions	Global growth office	Geo total
Geography	APAC	EU	IBOL	MEA	Nort America	BS	GDC	Connectivity	TS	C&S	DWS	Apps and BPS	SAP and SNOW			
APAC	7,452	130		1	2,012	6,191	1,326	638	730	7,102	1,907	17,371	985	2,826	82	48,753
EU		12,850	20,538	3	251	9,812	1,087	322	145	569	326	3,283	8	536	10	49,740
LATAM			17,732		148	1,704		6		346	1,367	3,643	30	263		25,239
MEA		6		2,851	2	96	22		150	381	94	3,110		465	21	7,188
North America		1	148	1	4,464	635	1,045	266	35	1,634	861	5,309	181	676		15,324
Unit total	7,452	12,987	38,418	2,856	6,877	18,717	3,480	1,232	1,060	10,032	4,555	32,716	1,204	4,766	181	146,533

Employee turnover

- 20.1%
- 29,017 people

(only available for full-time employees as per our definition)

→ Table 6: Headcount definitions used to define FTEs

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3.1.5. Characteristics of our employees: Reporting methodology and assumptions

[S1-6 MDR-M]

Data is gathered from multiple master source HR information systems across NTT DATA, Inc.

How full-time employees (FTEs) are defined

Table 9: Headcount definitions used to define FTEs

Metric	Definition
Headcount	Count of active workers at the end of the selected time period. Worker classification = “Employee,” “Contractor,” “Contingent” or “Temporary”
Permanent headcount	Count of active workers at the end of the selected time period. Worker classification = “Employee”
Temporary headcount	Count of active workers at the end of the selected time period. Worker classification = “Contractor,” “Contingent” or “Temporary”
Attrition	Count of workers terminated in the selected time period. Attrition is calculated for permanent employees only.
Annualized attrition rate (AAR)%	AAR = (Average monthly attrition ÷ Average monthly headcount) x 12 AAR % is calculated for permanent employees only.

Clarification of when employee numbers reported are recorded

FY25 (01 April 2025 to 31 March 2026)

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3.1.6. Case studies

NTT DATA One Voice survey

Our annual One Voice survey was sent to employees across NTT DATA, Inc. and approximately 100,000 people participated. The purpose of the survey is to connect with our employees around the world to better understand what they need from us as an employer: what's working, what isn't and what they need to do their best work.

Demonstrating strong engagement, our global engagement score is 75.3%, broadly in line with our scores last year and above external market benchmarks. This score correlates with the "intent to stay" metric, with more than 70% of employees reporting an intention to remain in NTT DATA for more than three years.

Overall, we found that 86% of our people are satisfied with our team atmosphere, 84% have clarity on their professional tasks, 84% feel a connection to our NTT DATA company values, 82% feel we have a culture of diversity and inclusion, and 75% feel that the organization is addressing the key aspects that support wellbeing.

Our action plans remain broadly in line with our already defined People and Culture (P&C) priorities, and we continue to address the feedback we've received to:

- Give employees greater opportunity to manage their own career plan and achieve their goals
- Provide more clarity on professional growth, promotion criteria and recognition
- Support colleagues with simpler processes and collaboration across teams while we transform our business

With valuable insights from our people and clear action plans, we continue to ensure that NTT DATA remains an employer of choice and to fulfil our commitment of making NTT DATA the place where people grow.



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Case studies

NTT DATA employee promise: Make this the place where you grow

Our ambition to “Make this the place where you grow” is our employee value proposition (EVP) and our promise to every colleague and candidate, underpinned by our company mission, culture and values. It defines why people choose to join our organization and why colleagues choose to build their careers at NTT DATA, offering clarity on growth, recognition and meaningful work in a supportive, innovative environment.

Refreshed in 2025, our EVP is based on extensive research and insights about what truly differentiates us and what current and prospective employees want to see in an employer.

Our employee promise enables us to attract, engage, develop and retain talented people, and it is based on three pillars: Belong, Develop and Innovate.

- **Belong**
  This is a place where people truly belong, grow and innovate together. United by a shared purpose to solve real-world problems and create positive impact, NTT DATA fosters an inclusive, people-first culture that values every voice and celebrates difference.
- **Develop**
  Here, you’re empowered to shape your own path, continuously learning and developing through meaningful work, collaboration and new technologies.
- **Innovate**
  Built on a legacy of innovation and driven by curiosity, at NTT DATA we think boldly, embrace change and co-create solutions with lasting value for our clients, society and the future.

We’ve shared our EVP across NTT DATA, Inc. to highlight the opportunities that exist in the business and invite employees to play an active role in helping our culture come to life.

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3.2. Diversity and Inclusion

This material topic recognizes the importance of building an inclusive culture where diverse people can contribute, grow and succeed. Our approach focuses on creating a workplace that values different perspectives, experiences and backgrounds, and enables employees to apply their individual strengths in support of our clients and society.

As client and societal needs become more diverse and complex, we are strengthening our ability to bring different viewpoints into how we work, innovate and make decisions. This includes fostering a culture of inclusion, supporting equitable opportunities and creating conditions where employees can participate fully and contribute meaningfully.

We also aim to strengthen innovation and decision-making by enabling diverse teams to work together effectively, helping us better reflect the societies and customers we serve while building a more inclusive and resilient workplace.

3.2.1. Policy

[S1 MDR-P]

Our workforce-related impacts, risks and opportunities are managed through centrally governed policies applied consistently across the organization. These include our Code of Conduct, anti-harassment and anti-discrimination policies (including legacy policies where applicable), equal opportunity frameworks, and formal grievance and speak-up mechanisms.

These policies establish clear behavioral standards, accountability and protections, addressing material risks such as misconduct, inequity, attrition and reputational exposure. They are complemented by structured workforce management practices focused on equitable recruitment, fair and transparent progression, and proactive attrition management. Together, these frameworks support the opportunity to build a diverse, inclusive and sustainable leadership pipeline.

No material changes to these frameworks and policies were made during the reporting period.

Scope and stakeholder coverage

These policies apply to all our operations globally, covering all employees and employment types across business units, regional entities and group functions. They are embedded within our People and Culture processes and systems and supported by enterprise-wide reporting. The primary stakeholders affected are employees, with a particular focus on underrepresented groups to ensure equitable access, experience and progression.

Reference to third-party standards or initiatives

Our policies are aligned with recognized principles of equal opportunity, nondiscrimination and ethical conduct. While not explicitly tied to a single external certification, they reflect broadly accepted international standards and regulatory expectations in the jurisdictions in which we operate.

Consideration of stakeholder interests

The design and implementation of these policies are informed by employee needs and experiences, captured through engagement mechanisms, grievance channels and workforce data insights. This ensures that policies are responsive to material workforce concerns, including inclusion, fairness, wellbeing and career development, and that they evolve in line with emerging risks and opportunities.

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3.2.2. KPIs (non-financial indicators)

Our approach is based on three key levers:

1. Diverse hiring

2. Equitable promotion and advancement

3. Strong retention through an inclusive environment

We consistently monitor our progress against these priorities to ensure we remain on track to meet and exceed our ambition for gender representation at the leadership level.

Table 10 Diversity and Inclusion KPIs

KPIs	FY24	FY25
Percentage of female managers	28.6%	30.1%
Leadership diversity	-	19.7% Executive Levels 1-4

3.2.3. Targets

[S1 MDR-T]

NTT DATA, Inc. uses quantitative and qualitative workforce metrics to monitor workforce-related impacts, risks and opportunities. These metrics include leadership representation, talent development, promotion outcomes and retention.

A key indicator is gender representation at leadership levels. Women currently represent approximately 19.7% of the executive population. The company tracks this indicator to assess whether its leadership pipeline, succession planning, promotion processes and retention practices support equal employment opportunity and fair access to career development.

Metrics embedded in the talent lifecycle to address underlying structural drivers

- **Hiring (Access)**
  Metrics include the diversity of applicant pools, shortlisting outcomes, interview-panel composition and offer rates by demographic, enabling visibility of potential bias or gaps in recruitment processes.
- **Progression (Grow)**
  Indicators focus on promotion equity and advancement velocity, including promotion rates, time to promotion, participation in sponsorship and development programs, and succession pipeline strength.
- **Retention and experience (Belong)**
  Metrics include employee engagement scores, early attrition rates, and participation in inclusion initiatives such as employee resource groups and mentoring programs.
- **Leadership accountability (Lead)**
  Inclusion-related indicators are embedded in leadership scorecards, with leaders expected to demonstrate progress in representation, sponsorship, inclusion outcomes and access to opportunities.

These metrics and indicators are supported by enterprise-wide data systems and dashboards, providing a single source of truth and enabling the consistent monitoring of hiring, progression, attrition and succession. Regular review through executive governance forums, including the D&I Council, ensures accountability and enables timely, data-driven interventions.

Together, these metrics enable us to systematically monitor progress, manage workforce-related risks and identify opportunities to build a more inclusive, equitable and high-performing workforce over time.



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3.2.4. Actions

[S1 MDR-A]

To manage material workforce-related impacts, risks and opportunities, NTT DATA, Inc. has implemented a global Diversity and Inclusion (D&I) Strategy, effective 2026, structured on four strategic pillars: Access, Belong, Grow and Lead.

These pillars translate into targeted, organization-wide action plans that are embedded in core People and Culture processes and supported by dedicated governance and reporting mechanisms.

Access

Actions focus on strengthening equitable recruitment practices, including inclusive hiring standards, diverse talent pipelines, and bias-aware processes and training. These initiatives are being implemented globally, with ongoing enhancements planned over the next two years.

Belong

Actions aim to improve the employee experience and employee retention through engagement mechanisms and workplace practices that foster psychological safety and inclusion. These are continuously monitored and refined based on employee feedback and workforce data.

Grow

Actions center on equitable progression, including transparent performance management frameworks, structured development pathways, and sponsorship initiatives to address advancement gaps and strengthen succession pipelines.

Lead

Actions focus on building inclusive leadership capability and accountability, supported by leadership development, governance frameworks, and data-driven insight of representation, progression and equity.

These actions are supported by enterprise-wide resources, including central People and Culture teams, dedicated D&I governance, and Power BI as a single source of truth for workforce data, enabling consistent global implementation and monitoring. They are designed to mitigate key risks such as inequity, attrition and disengagement, while enabling opportunities to build a diverse, inclusive and high-performing workforce.

Expected outcomes

Expected outcomes include improved gender representation and diversity across leadership levels, reduced attrition through enhanced employee experience, greater equity in career progression, and stronger leadership accountability for inclusion.

Ongoing monitoring of workforce metrics, including representation, attrition and engagement, supports evidence-based decision-making and ensures alignment with our objectives.

Collectively, these actions embed inclusion, fairness and accountability into the full employee lifecycle, thereby driving sustainable progress against identified workforce-related impacts, risks and opportunities

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3.2.5. Diversity of the administrative, management and supervisory bodies

[ESRS 2 GOV-1, S1-9]

	Total	Female	Male
Board of Directors	12	3 (25%)	9 (75%)
Executive Leadership Team	18	4 (22.2%)	14 (77.8%)
Executive levels 1 to 4	1,256	247 (19.7%)	1009 (80.3%)

Since 2025, diversity and inclusion has been actively governed by the CEO, CPO, and People and Culture Senior Leadership Team, with each business supported by a dedicated D&I practitioner to drive workplace engagement and inclusion. Genuine commitment was further demonstrated through the recruitment of a D&I Leader in November 2025.

At Group level, governance is reinforced through leadership targets set each year. Building on this foundation, the evidence-based D&I strategy for 2026 will launch with the establishment of a D&I Council, comprising Board members and representation from the business, to guide and accelerate our inclusion agenda.

3.2.6. Diversity of the administrative, management and supervisory bodies: Reporting methodology and assumptions

[S1-9 MDR-M]

Data is gathered from multiple master source HR information systems across NTT DATA, Inc.

Metric	Definition
Female headcount	Count of active workers at the end of the selected reporting period where gender is “Female”.
Leadership	"Executive" includes employees at Levels 1 to 4 in the NTT DATA career architecture.



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Embedding an inclusive culture through transformation and employee voice

Our ambition to “Make this the place where you grow” is our Employee Value Proposition (EVP) and our promise to every colleague and candidate, underpinned by our company mission, culture and values. It defines why people choose to join our organization and why colleagues choose to build their careers at NTT DATA, offering clarity on growth, recognition and meaningful work in a supportive, innovative environment.

In July 2025, NTT DATA, Inc. launched its refreshed culture statement — “Be the place where people grow” — alongside four core values:

- Respect every voice.
- Think big. Be bold.
- Deliver the outcome.
- Win together.

The deliberate sequencing of these values reflects our commitment to leading with inclusion, placing respect and voice at the foundation of how teams collaborate, make decisions and deliver outcomes.

This culture transformation is being actively embedded across the organization through structured culture conversations and targeted programs designed to reinforce inclusive behaviors and align day-to-day practices with stated values. These efforts, alongside broader diversity and inclusion initiatives, demonstrate a clear shift from articulation to action — ensuring inclusion is not only a principle but also embedded in how work gets done across teams and geographies.

Employee voice is a critical component of this approach

The annual One Voice employee engagement survey includes a dedicated set of D&I indicators to assess whether the organization is meeting its commitment to being a place where everyone can join, contribute, grow and feel a sense of belonging. These indicators assess whether:

- Employees can succeed, regardless of background
- Individuals feel able to be themselves at work
- People are treated with respect
- Employees experience a sense of belonging
- Leadership visibly supports diversity and inclusion through both words and actions

The survey also provides employees with the opportunity to share feedback on what is working well and where change is needed, enabling us to identify and address gaps at a granular level across global, regional, country and team dimensions.

In the most recent annual survey cycle, over 80% of employees — nearly 100,000 respondents — reported positive experiences across these D&I dimensions. These insights inform ongoing priorities and targeted actions, ensuring that inclusion continues to be measured, reinforced and continuously improved as a core element of organizational culture.

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Case studies

Supporting Inclusion Networks across our communities

Inclusion Networks are employee-powered communities that strengthen belonging, amplify diverse perspectives and create meaningful connections across our organization.

They serve as a strategic bridge between employee experience and leadership action — surfacing insights, developing future leaders, and helping shape a more inclusive culture where people and business can thrive.

Their impact extends far beyond culture by:

- Building belonging that strengthens retention and engagement
- Developing future leaders and expanding opportunity
- Elevating employee perspectives to inform strategy and decision-making
- Connecting our workforce to the clients and communities we serve
- Powering innovation and performance through diverse voices and experiences

Current networks include communities focusing on women, LGBTQ+ (Pride), neurodiversity, diverse abilities, wellbeing, veterans, and cultures and ethnicities.



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D&I recognition

In FY25, NTT DATA, Inc. received multiple external recognitions across key markets, reflecting our commitment to diversity and inclusion as a core driver of workforce sustainability, talent attraction and inclusive culture.

Gender equity and inclusive workplace practices

GISA, a subsidiary of NTT DATA Business Solutions in Germany, was named among the Best Companies for Women 2025 by Brigitte, which evaluates organizations based on gender equality measures, career development, work–life balance and leadership representation. This was complemented by certifications such as the audit berufundfamilie and Family Friendliness, which assess policies supporting work–life integration and inclusive employee experience.

NTT DATA Germany achieved recognition in the Frauen-Karriere-Index (FKi), reflecting its structural commitment to gender equality and advancement opportunities for women. In Austria, NTT DATA was certified as a Great Place to Work, highlighting strong employee engagement and a culture that values diversity and belonging.

In the US, NTT DATA was recognized as a Best Place to Work for Women, reflecting strong performance in inclusion, employee experience and equitable workplace practices.

Inclusion and equity

In Germany, NTT DATA Business Solutions was awarded PRIDE Champion status by UHLALA Group, acknowledging its commitment to LGBTQ+ inclusion and workplace equality.

In Italy, the Speed FEM Award recognized efforts to advance gender equity through intersectional approaches, while in Chile and Colombia, national recognitions highlighted commitments to migrant inclusion and women's empowerment programs.

Social mobility and inclusive talent pipelines

In the UK, NTT DATA was a finalist in the Tech for Social Mobility Awards 2025 and the CRN Sustainability in Tech Awards 2026, and was featured in The Social Mobility List 2026. These awards highlight initiatives such as the Brighter Futures Program, which supports students from disadvantaged backgrounds and addresses the digital divide.

This recognition reflects strong external validation of NTT DATA's efforts to manage material workforce-related impacts and opportunities, particularly in advancing gender equity, fostering inclusive workplaces, strengthening the employee experience and expanding access to opportunities for underrepresented groups.



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3.3. Health and Safety

This material topic recognizes the importance of protecting the physical and mental wellbeing of our people as working environments become more diverse and the risks related to long working hours, mental health and workplace safety continue to evolve. Our approach focuses on prevention, governance, risk assessment, awareness and training to support a safe, healthy and sustainable workplace.

As the nature of work changes across our business, we are strengthening the systems and practices needed to identify and manage health and safety risks. These include addressing psychosocial risks such as long working hours and mental health concerns, and preventing workplace accidents in higher-risk environments such as data center operations.

We also aim to build a stronger culture of safety and wellbeing through hazard risk assessments, clear governance, education and training, helping employees work safely and access support when needed so we can build a healthier workplace over time.

3.3.1. KPIs (non-financial indicators)

No fatal accidents

3.3.2. Health and Safety metrics

[S1-14]

Table 11: Number of fatalities

KPIs	FY24	FY25
Number of fatalities	1	0

Number of fatalities as result of work-related injuries and work-related ill health of other workers working on NTT DATA, Inc.'s sites

0

3.3.3. Health and Safety metrics: Reporting methodology and assumptions

[S1-14 MDR-M]

An NTT DATA-accountable fatality is defined as a death that occurs within the scope of our operations and is deemed the responsibility of NTT DATA. To qualify under this definition, the incident must meet the following criteria:

- It involves a work-related event or occupational exposure that directly results in death.
- The individual affected is an employee or contractor, including subcontractors.
- The incident occurred at an NTT DATA-controlled location while the individual was performing work under the direct or indirect control of NTT DATA (for example, through an NTT DATA-appointed contractor or subcontractor).

This definition applies regardless of employment status, provided the work is being conducted under NTT DATA's operational oversight. The fatality must be a consequence of injury or exposure arising from the individual's assigned duties.

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Zero Harm program: NTT Global Data Centers

The Zero Harm program is a core component of NTT Global Data Centers' health, safety and environment (HSE) framework and supports its wider ESG commitments. The program is founded on the principle that all incidents are preventable and that sustained safety performance is achieved through strong governance, visible leadership, workforce engagement and continuous learning.

Phased rollout strengthens ownership

In FY25, Zero Harm was deployed in the business through a structured, phased regional rollout, implemented at a rate of one region per quarter. This approach supported effective change management, enabled alignment with regional regulatory requirements, and ensured consistent application of global HSE standards while incorporating lessons learned from earlier deployments. The phased rollout strengthened ownership at regional and site levels and reinforced accountability for health and safety outcomes.

Leadership engagement supports a strong safety culture

Leadership engagement remained a key focus, with defined expectations for safety at all management levels. Leaders are expected to visibly demonstrate commitment to Zero Harm through regular site engagement, structured safety conversations, and the integration of safety considerations into operational and project decision-making. These practices support a strong safety culture and clear governance accountability.

Promoting proactive safety behaviors across the workforce

Initiatives in the year focused on increasing hazard identification and near-miss reporting, encouraging speaking up, and recognizing positive safety behaviors through peer-to-peer recognition. These activities contribute to a transparent reporting culture and support early risk identification and prevention.

A stronger global HSE management system

NTT Global Data Centers also strengthened its global HSE management system, aligning it with internationally recognized standards, including ISO 45001. Core processes such as incident management, risk assessment, contractor safety management and learning from events were further standardized to enhance consistency, assurance and continuous improvement, while remaining responsive to local legal and regulatory requirements.

Overall, the Zero Harm program continues to improve leadership accountability, workforce engagement and the maturity of our safety culture. It is a key enabler of operational resilience, employee wellbeing and sustainable long-term business performance.



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Case studies

Psychosocial risk management program, Australia and New Zealand (ANZ)

Recognizing psychosocial risk as a material workforce and enterprise risk, NTT DATA in ANZ has implemented a structured psychosocial risk management program designed to identify, assess, control and monitor psychosocial risks with the same rigor that's applied to physical safety risks, enabling informed decision-making, leadership accountability and sustainable workforce performance.

Program context and regulatory alignment

Psychosocial risk refers to work-related factors that have the potential to cause psychological harm, such as excessive workload, organizational change, poor role clarity, ineffective leadership behaviors and inadequate support. When unmanaged, these risks contribute to psychological injury, reduced performance, increased absenteeism and turnover, and elevated legal and reputational exposure.

Managing psychosocial risk is also a clearly defined employer obligation, with explicit expectations for prevention, governance, consultation and demonstrable control effectiveness. This regulatory environment raises organizational risk exposure in the areas of compliance obligations, psychological injury claims, leadership accountability and sustainability reporting.

An enterprise-wide model for managing psychosocial risk

The ANZ psychosocial risk management program has been developed as a scalable, enterprise-wide model, aligned with evolving global regulatory and reporting expectations, including the Corporate Sustainability Reporting Directive (CSRD), ISO 45001 and ISO 45003. Australia was selected as the initial implementation market due to its advanced regulatory landscape and increased enforcement focus on psychosocial hazards, led by bodies such as Safe Work Australia.

Australia also provides a mature operating environment with established health, safety and wellbeing (HSW) systems and leadership capability, making it an effective pilot market to design, test and validate a globally scalable approach.

Key achievements

- **Framework implementation**
  Designed and deployed a standardized psychosocial risk management framework aligned to ISO 45003, enabling consistent identification, assessment and control of psychosocial hazards across the organization
- **Integration into enterprise risk management**
  Embedded psychosocial risks into enterprise risk registers, governance forums and reporting structures, increasing visibility and executive oversight
- **Risk assessment and controls**
  Delivered psychosocial risk assessments across business units, identifying key hazards (for example workload, organizational change, leadership behaviors) and implementing controls integrated into operational and people management practices
- **Measurement and reporting**
  Defined leading and lagging indicators to monitor risk exposure, control effectiveness, workforce sentiment and incident trends, supporting data-driven decision-making

Business impact

- **Risk reduction and compliance**
  Improved alignment with regulatory expectations and audit readiness, reducing legal, financial and reputational risk
- **Financial performance**
  Enabled cost analysis and visibility of impacts associated with psychological injury claims, absenteeism, presenteeism and workforce turnover
- **Workforce outcomes**
  Identified and addressed key risks to employee engagement, psychological safety and organizational trust, supporting sustained productivity and performance

This program shifts the organization from fragmented, reactive wellbeing activities to a proactive, prevention-focused, risk-based discipline, embedded within health, safety and wellbeing (HSW) and enterprise risk management systems.

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3.4. Human Rights

This material topic recognizes the importance of respecting human rights across our operations and business relationships as expectations for corporate responsibility continue to increase. Our approach focuses on governance, due diligence, risk prevention and access to remedy to help identify, prevent, mitigate and address adverse impacts on people connected to our business.

As human rights risks become more closely scrutinized across global value chains, we are improving the way respect for human rights is embedded into policies, decision-making and day-to-day business practices. This includes identifying actual and potential impacts, engaging relevant stakeholders and taking appropriate action where risks or impacts are identified.

We also aim to support responsible business conduct across our value chain by working with employees, suppliers and partners to prevent and mitigate negative human rights impacts, and by taking remedial measures where necessary.

3.4.1. Policy

[S1 MDR-P]

NTT DATA, Inc. has adopted several policies to manage material people impacts, risks and opportunities (including human rights and ethics topics relevant to our own workforce).

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NTT Group Human Rights Policy

Commits the group to respect internationally recognized human rights in line with the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights (UNGPs), and prohibits forced and compulsory labor, human trafficking and child labor.

Scope

NTT Group (including group companies); applies across operations and is intended to be embedded in business activities and relationships.

Third-party standards

References alignment to international standards and laws; links to the NTT Group Human Rights Policy.

Stakeholders

Employees/workers and broader stakeholders covered by the policy

→ NTT Group Human Rights Policy

NTT DATA Code of Business Ethics

Sets expected ethical behavior for employees and outlines commitments to respect human rights, maintain workplace safety, reject harassment, support diversity and nondiscrimination, and reject modern slavery, human trafficking, and forced and child labor. It includes expectations for business partners and supply chain ethics.

Scope

Our employees and business partners across NTT DATA group operations

Third-party standards

References alignment to international standards and laws; links to the NTT Group Human Rights Policy

Stakeholders

All employees and the value chain

→ Code of Business Ethics

Speak Up and Whistleblowing Policy

Establishes reporting channels and protections (confidentiality, anonymity, nonretaliation), processes for acknowledgment within 7 days and investigation and feedback within 3 months, and coverage for employees and third parties. This underpins grievance mechanisms for workforce-related concerns (including discrimination, harassment, human rights violations, and health and safety concerns).

Scope

Our employees, clients and their representatives, other third parties, including contractors and suppliers, and any other person or affected community that wishes to raise a report based on any interaction with NTT DATA.

→ SpeakUp

Modern Slavery and Human Trafficking Statement (FY25)

Sets a zero-tolerance position and describes our governance, risk assessment and due diligence approach, supplier expectations, reporting channels and training coverage.

Scope

NTT DATA, Inc. and listed subsidiaries for UK, Canada & Australia reporting

Third-party standards

UNGPs referenced

→ Modern Slavery and Human Trafficking Statement

Risk Management Policy and Risk Management Framework

Describes risk governance (three lines of defense), processes for risk identification, assessment, monitoring and reporting, and board and committee oversight structures, supporting the management of material ESG-related risks (including human rights and compliance risks).

Scope

NTT DATA, Inc. and subsidiaries globally

3.4.2. KPIs (non-financial indicators)

Due diligence implementation

100% risk-based due diligence implementation across the NTT DATA Group, conducted internally on an annual basis.

Establishment of grievance mechanisms

CSDDD-aligned establishment of grievance mechanisms.

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3.4.3. Targets

[S1 MDR-T]

Human rights due diligence (HRDD)

100% risk-based internal HRDD, covering the NTT DATA Group, with additional due diligence for identified high-risk countries and subsidiaries with the highest employee headcount or revenue.

Grievance mechanisms

Roadmap to enhance global grievance mechanisms in line with CSDDD, with the mechanism fully operational by July 2029.

Training

Ongoing collection of human rights-related training data across business units, with mandatory compliance training expectations (for example, Code of Business Ethics training completion tracked and reported in the Modern Slavery Statement).

3.4.4. Actions

[S1 MDR-A]

Key action plans and resources underway to manage material human rights impacts/risks (own workforce and relevant business relationships) include:

- Annual human rights due diligence (HRDD) through a group-wide self-assessment questionnaire (SAQ), updated in consultation with the Human Rights TWG, covering business units, major subsidiaries and entities in high-risk countries, and complemented by targeted interviews with large group companies outside the SAQ cycle to confirm management status and risks.
- Risk mitigation follow-up on medium-risk areas identified through the HRDD (for example, occupational health and safety and appropriate working environment), including reconfirmation with Procurement, discussion of remediation plans, and review of incidents and controls for harassment and occupational health and safety.
- Grievance-mechanism strengthening through the assessment of our current status, a gap analysis, and a roadmap to enhance global grievance mechanisms and align with incident reporting systems; continuing refinement through FY26 and beyond.
- Training and awareness, including mandatory Code of Business Ethics and compliance training (including modern slavery and human rights topics) and the development of human rights learning content (for example, Sustainability Academy human rights module), with a TWG-led collection of human rights training data across business units for continuous improvement and disclosure.
- CSDDD/CSRD readiness program with dedicated working groups (Human Rights TWG and Supply Chain TWG) involving Risk and Compliance, Sustainability, HR and Procurement stakeholders to strengthen due diligence, governance and disclosure readiness.
- Resources and ownership: Oversight through Corporate Sustainability, Human Rights, Legal, Risk and Compliance, People and Culture, Procurement and other functions, with thematic working groups providing coordination and delivery.



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3.4.5. Due diligence process

[ESRS 2 GOV-4, IRO-1]

Policies and commitments

- NTT Group Human Rights Policy
- NTT DATA Code of Business Ethics
- Modern Slavery and Human Trafficking Statement
- Speak Up and Whistleblowing Policy.

Due diligence governance

Human Rights TWG and Supply Chain TWG (cross-functional, multiregion participation) supporting CSDDD readiness and HRDD implementation.

Due diligence process

Identifying, assessing, prioritizing and monitoring impacts

Risk identification and assessment

- Annual HRDD self-assessment questionnaire (SAQ)
- External indices to identify high-risk countries
- Risk and vulnerability scoring
- Follow-up interviews for selected entities

Grievance mechanisms

SpeakUp system (confidential, anonymous) and planned enhancements to global grievance mechanisms.

Overview of process (current state)

Identify heightened-risk areas
NTT DATA Group HRDD identifies high-risk countries by using external indices such as the Modern Slavery Index and ILO statistics, and includes entities operating in those geographies in HRDD coverage. The HRDD cycle also includes follow-up interviews for selected large entities outside the SAQ cycle.

Assess and score
HRDD uses an SAQ to assess risk management maturity and identify incidents and vulnerabilities. Outputs include risk scoring (severity/likelihood framing) and vulnerability assessments, which have highlighted medium-risk focus areas such as human rights at suppliers, and occupational health and safety and appropriate working environment.

Prioritize
Prioritization is informed by risk results (for example, medium-risk findings) and red-flag human-rights risk topics (child labor, forced labor, wages, occupational health and safety) that require immediate attention if controls are inadequate.

Monitor and follow up
Planned follow-ups include confirming incident details and remediation actions (for example, harassment and occupational health and safety cases), and working with Procurement to reconfirm supplier-management practices and develop remediation plans where cascade is weak.

Stakeholder consultation
Currently, engagement activities have been limited; the Group is planning to strengthen stakeholder engagement and shift to a more risk-based scoping approach (multidimensional across geographies, sectors, operations and products) to align with CSDDD requirements.

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3.4.6. Annual due diligence results

NTT DATA, Inc. has implemented an expanded annual HRDD cycle supported by a cross-functional Human Rights Thematic Working Group (Human Rights TWG) to support CSRD/CSDDD readiness.

The HRDD approach includes:

- Updating and distributing an SAQ to business units, major subsidiaries, and entities in high-risk countries
- Analyzing SAQ results to produce risk and vulnerability assessments
- Identifying red-flag human rights risk topics requiring immediate remediation if controls are inadequate (child labor, forced labor, wages, occupational health and safety)
- Planning and implementing follow-up actions and remediation planning for identified medium-risk focus areas

Our most recent annual HRDD analysis indicates no salient high-risk issues identified at Group level through our current methodology, and a single medium-risk topic, occupational health and safety and appropriate working environment, prompting planned follow-ups with relevant departments and confirmatory reviews of incident details and preventive measures.

3.4.7. Forced labor

[ESRS 2 SBM-3]

Information about countries or geographic areas with operations considered at significant risk of incidents of forced labor, compulsory labor or child labor.

Table 12: Countries where NTT DATA has operations that have been flagged as high risk for additional HRDD during the current three-year cycle (FY25–FY27)

FY25 cycle	FY26 cycle	FY27 cycle
Brazil	China	Ecuador
Malaysia	Colombia	Indonesia
Myanmar	India	Morocco
Philippines	Kenya	Qatar
Türkiye	Mexico	Saudi Arabia

NTT DATA identifies high-risk countries using information from sources such as the Global Slavery Index and ILO statistics.

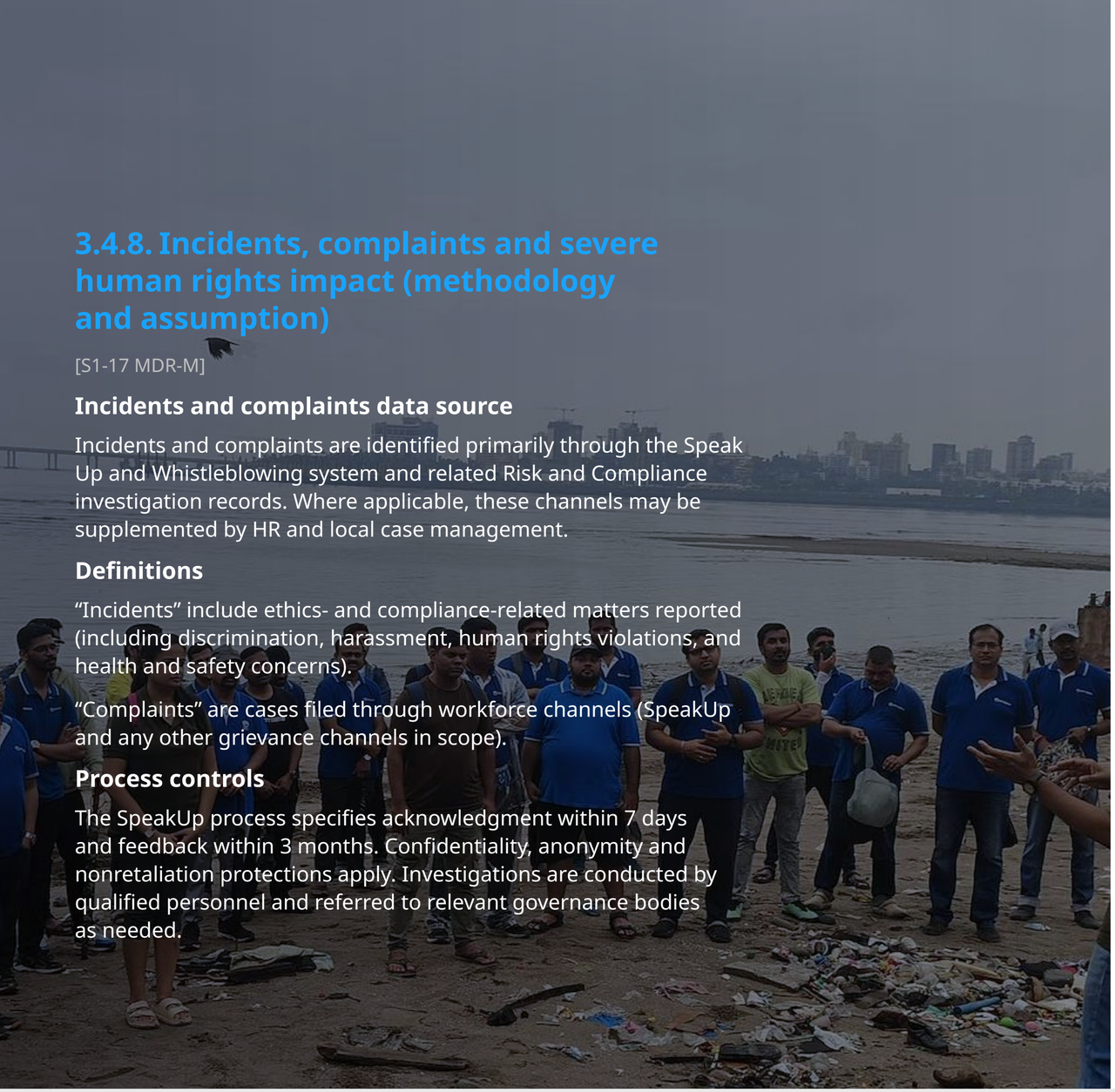


Information about type of operations at significant risk of incidents of child labor

As a global business and technology services leader, NTT DATA's primary operations are office-based and involve professional services, which generally have a lower inherent child-labor risk than labor-intensive manufacturing. Potentially higher-risk operation types, where relevant to NTT DATA's value chain and certain geographies, may include:

- Outsourced facilities services (cleaning, security, catering)
- Construction and fit-out activities (for example, offices and data centers) delivered by contractors
- Hardware and equipment manufacturing within the supply chain (original equipment manufacturers (OEMs) and component suppliers)
- Certain contingent labor and recruitment agency supply chains

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3.4.8. Incidents, complaints and severe human rights impact (methodology and assumption)

[S1-17 MDR-M]

Incidents and complaints data source

Incidents and complaints are identified primarily through the Speak Up and Whistleblowing system and related Risk and Compliance investigation records. Where applicable, these channels may be supplemented by HR and local case management.

Definitions

“Incidents” include ethics- and compliance-related matters reported (including discrimination, harassment, human rights violations, and health and safety concerns).

“Complaints” are cases filed through workforce channels (SpeakUp and any other grievance channels in scope).

Process controls

The SpeakUp process specifies acknowledgment within 7 days and feedback within 3 months. Confidentiality, anonymity and nonretaliation protections apply. Investigations are conducted by qualified personnel and referred to relevant governance bodies as needed.

3.5. Digital Accessibility

This material topic recognizes the role of digital technology in enabling broader inclusion and equitable access to essential services and opportunities. Our approach focuses on two levers. The first is advancing accessible-by-design digital solutions, such as websites and applications that help people with different abilities see, understand and use digital services. The second is expanding digital inclusion through skills for growth, including digital literacy, employability and STEM skills.

As more services, learning opportunities and economic activities move online, digital exclusion can limit access to education, healthcare, employment and participation in society. We are working to provide IT services that support access to basic needs, apply accessible user interfaces and universal design principles to our solutions, and improve digital literacy so that more people can use technology with confidence and independence.

Our ambition is to digitally impact underserved communities, enabling more people to access services, education and opportunities in the digital economy. By designing and delivering digital services that are accessible, inclusive and supportive of users with diverse needs and capabilities, and helping to reduce barriers created by disability, infrastructure gaps and limited digital skills, we aim to strengthen communities, building trust, credibility and long-term value.

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3.5.1. Policy

[S4 MDR-P]

Digital accessibility at NTT DATA, Inc. is driven by our commitment to responsible innovation and contributing to a more inclusive society and improved livelihoods through our digital capabilities.

We aim to complete and publish our Sustainability Policy in FY26. In reference to digital accessibility, the policy will cover:

- Our own operations, including internal and external digital platforms and services
- Client-facing digital solutions, where accessibility-by-design principles are applied to help clients create more inclusive digital experiences and respond to regulatory and market expectations
- Digital-inclusion programs, including skills development, employability, capability building in science, technology, engineering and mathematics (STEM), and learning infrastructure programs delivered across regions and business units

Affected stakeholder groups include end users of digital services, clients, employees, persons with disabilities, and underserved communities facing economic, geographic, accessibility or skills barriers to digital participation.

3.5.2. KPIs (non-financial indicators)

Digital Impact

Through our Digital Impact initiative, we aim to positively impact people in underserved communities through digital accessibility solutions and inclusion programs.

Our internal target reflects our commitment to addressing the digital divide and improving access to essential services such as education, healthcare, public services and employment. It supports digital inclusion by promoting inclusive user interfaces, universal design, accessible-by-design practices and digital literacy initiatives across regions and business units.

The target is designed to evidence measurable progress in expanding digital participation and enabling more inclusive outcomes for people and communities.



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3.5.3. Targets

[S4 MDR-T]

NTT DATA, Inc. has established a measurable, time-bound target for digital accessibility under Digital Impact.

The target directly supports our digital accessibility objectives and is enabled by actions across two strategic levers:

- Accessible-by-design
- Digital inclusion

Scope and boundaries

The target applies globally and includes:

- Our own operations
- Client digital accessibility solutions delivered across sectors
- Digital-inclusion initiatives focused on learning infrastructure and skills for growth
- Community initiatives, charitable contributions and volunteering activities

Baseline

FY24 is used as the baseline year, based on existing sustainability and social impact reporting data. Baselines are refined annually as methodologies mature.

Impact measurement

Impact measurement is based on consolidated datasets from regions and business units, including:

- Accessible-by-design initiatives and estimated user reach
- Digital-inclusion programs, including digital literacy, employability and STEM initiatives
- Learning infrastructure investments and related community support
- Employee volunteering related to digital skills and accessibility

Key indicators

- Number of people impacted (direct and indirect, where applicable)
- Number of learning, digital access and skills projects
- Number of accessible products and services
- Financial and in-kind investment
- Employee participation levels

Further collaboration is ongoing to finalize and standardize methodologies and reporting metrics.

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3.5.4. Actions

[S4 MDR-A]

In FY25, NTT DATA, Inc. implemented and advanced several key actions to manage digital accessibility impact, risks and opportunities aligned with Digital Impact.

Key actions implemented and ongoing

- Deployment of inclusive digital solutions for clients; embedding accessibility by design into platforms, applications and public-facing digital services
- Delivery of digital inclusion initiatives, including digital literacy, employability, accessibility and STEM-focused training programs, for both employees and communities
- Support for community digital accessibility initiatives, including learning infrastructure projects, digital literacy programs, and outreach activities led by regional and business unit teams
- Establishment of structured data collection and consolidation processes at regional and business-unit level, coordinated by the social sustainability team, to track impact, participation and outcomes

Planned actions

- Further standardization of digital accessibility measurement methodologies across regions and business units
- Continued scale-up of high-impact, replicable programs aligned with the accessible-by-design and digital inclusion levers
- Strengthened collaboration across internal teams to refine targets, metrics and reporting approaches

Expected outcomes

- Increase the number of people affected by accessible digital solutions
- Reduce barriers to digital participation
- Strengthen regulatory readiness

We will deliver Digital Impact through two interconnected levers

	Accessible-by-design	Digital Inclusion	
	Inclusive digital solutions	**Skills for growth**	**Learning infrastructure**
Outcomes	Make accessibility-by-design the standard, enabling inclusive innovation and long-term market leadership	Grow skills in underserved communities	Enable inclusive learning environments by addressing fundamental needs in underserved communities
Focused investment	• Accessibility-by-design solutions • Webpage accessibility solutions • Application accessibility solutions • Accessibility training for designers and developers • Adoption of accessibility-by-design into design and development practices	• Digital literacy • Accessibility skills • Employability skills • Innovative thinking skills • Volunteering & mentoring skills	Existing and new CSR investment focus to drive • Learning environment • Learning platforms • Digital hubs • Affordable and inclusive connectivity models • IT device donation and reuse programs to bridge the digital education gap
Amplifiers	**Technology to drive inclusive solutions**	**Focused investment**	**NGO partnerships to scale global impact**

Underserved communities: Individuals or communities (including women, older adults, and persons with disabilities) who face systemic economic, geographic, accessibility, or skills barriers that limit equitable digital participation

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3.5.5. Case studies

Digital Jungle: Digital literacy and safe access (Romania)

The Digital Jungle program, developed by NTT DATA in Romania, delivers education on online safety, cyberbullying prevention and responsible technology use through interactive sessions led by employee volunteers. The program empowers children, parents and educators to engage more safely and confidently in digital environments, strengthening inclusive access, and has reached a total of 60 schools and 8,000 individuals since its inception in 2022.

Educating society about online safety

Digital Jungle is a corporate social responsibility and educational initiative that does not designate a single beneficiary organization. Instead, its primary beneficiaries are children, teenagers, parents and teachers, who receive guidance on online safety, cybersecurity awareness and responsible internet use.

The program is implemented in collaboration with public institutions and partners such as school inspectorates, police authorities and organizations, which support its delivery and outreach but are not beneficiaries themselves. Overall, Digital Jungle is structured to create societal impact by educating the broader community rather than providing funding to a specific entity.

Targeted interventions to protect young users

Children access the internet from an early age and spend significant time online, with over 70% using the internet for at least 3 hours daily, increasing their exposure to online risks such as harmful and misleading digital content and cyberbullying (affecting approximately 2 in 5 children, with girls disproportionately impacted). Approximately two thirds of children report having no limits on time spent online, and nearly 8 in 10 have unrestricted access to websites, indicating limited parental monitoring and control.

Source: Cercetare sociologică privind comportamentele periculoase ale tinerilor pe Internetv

In response, Digital Jungle delivers targeted educational interventions designed to build awareness and practical skills among students, parents and educators. Through interactive sessions and complementary initiatives such as self-paced online courses aimed at training more than 5,000 teachers and professionals, the program strengthens the capacity of adults to guide children effectively while empowering young users to navigate digital environments responsibly.

Reach and growth (2022 to mid-2026)

- 8,000 students reached, up from an initial group of 30
- 60 schools involved, expanding from just 1 school
- 5 cities covered, growing from a single location
- 70 volunteers in our company engaged in program delivery

Institutional and public sector partnerships

Digital Jungle is strongly anchored in collaboration with public authorities, especially in education and safety:

- 3 County Police Inspectorates partnerships: IPJ Cluj; IPJ Sibiu; IPJ Brașov
- 2 County School Inspectorates: ISJ Cluj; ISJ Brașov

IPJ: Inspectoratul de Poliție Județean (County Police Inspectorates)
ISJ: Inspectoratul Școlar Județean (County School Inspectorates)

These institutions support the program by:

- Facilitating access to schools
- Providing expertise on online safety and cybercrime prevention
- Strengthening credibility and outreach at community level

By addressing early exposure, prevalent online risks, cyberbullying dynamics and gaps in supervision and education, the initiative contributes to a more informed, resilient and supportive digital ecosystem.

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3.5.5. Case studies

Digital accessibility through education in India

Recognizing that true digital inclusion begins with safe, enabling learning environments, NTT DATA has contributed to upgrading school infrastructure in over 40 government schools in India while enabling holistic STEM-based education to drive equitable progress.

- **Lever:** Learning infrastructure and skills for growth
- **Beneficiaries:** Children in underserved communities
- **People directly impacted:** More than 61,655

Education is a powerful driver of social change; however, many government and underserved schools continue to face problems such as unsafe classrooms, inadequate sanitation, lack of clean drinking water, unreliable electricity and limited access to technology — barriers that directly affect student attendance, wellbeing, learning outcomes, and future opportunities.

Recognizing that true digital inclusion begins with safe, enabling learning environments, NTT DATA has contributed to upgrading school infrastructure and providing essential education supplies for more than 40 government schools while enabling STEM-based, holistic education to drive equitable progress.

Our initiative has reached over 25,926 students across multiple locations. Building on this foundation and aligned with our core strength in technology, NTT DATA India also invests in STEM education, robotics, ICT labs and smart classrooms, empowering more than 35,729 students across 183 government schools and 2 colleges through hands-on learning, immersive digital tools, and teacher capacity building — positioning NTT DATA as a catalyst for digital accessibility, future workforce readiness and inclusive national growth.

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3.6. Social value

Beyond the material topics that structure this report, NTT DATA also creates social value through broader social impact activities, including charitable donations, employee volunteering and community-based programs.

These initiatives reflect our commitment to contributing positively to society by supporting local communities, expanding access to opportunities and helping address social needs outside our formal materiality framework. Together, these activities complement our core sustainability priorities by enabling our people, partnerships and resources to generate meaningful impact beyond our direct business operations.

Where applicable, currencies have been converted to US dollars ($) at the foreign exchange rate of 28 February 2025.

3.6.1. Cash donations

$3,643,011.39

247
fundraising and donation-related activities

28
countries

3.6.2. Volunteer hours

30,468
volunteers

250+
events

32
countries:

32,947
hours

1,976,820
minutes

4,118.38
8-hour days

3.6.3. Goods donations

$34,830.83

65
activities

29
countries.

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3.6.4. Case studies

Volunteering

Earth to Ocean

Earth to Ocean 2025 was a global employee-led sustainability campaign that ran between April and June 2025, engaging teams across APAC, EMEA and the Americas. The campaign focused on environmental protection, marine conservation, waste reduction, biodiversity and sustainable lifestyles.

108 trees planted

1.83TB digital data cleanup

18 awareness sessions

298kg waste collected

1,678kg e-waste collected

Activities included:

- Environmental clean-ups: Beach, river, coastal and urban cleanups took place in India, China, Indonesia, Germany, Spain, Australia, the UK and the US, removing hundreds of kilograms of waste, with a strong focus on plastic pollution.
- Waste reduction and circular economy initiatives: Activities such as Rags-to-Bags, reusable-cup campaigns, no-single-use-plastic weeks, e-waste drives and digital cleanups helped reduce landfill, plastic use and electronic waste.
- Biodiversity and nature actions: Volunteers built bee hotels, insect hotels and bird houses, planted trees and made coir pots, and supported habitat regeneration to strengthen local ecosystems.
- Sustainable living and awareness: Initiatives like the Honesty Thrift Shop (Philippines) promoted conscious consumption and raised funds, while green workshops, refill corners and upcycling sessions encouraged sustainable habits.
- Education and engagement: Webinars, quizzes, poster-making for schoolchildren and community workshops raised awareness on climate, ocean health and environmental responsibility.
- Community and NGO partnerships: Events were delivered in collaboration with local NGOs, schools and environmental organizations, reinforcing community impact and long-term engagement.

Earth to Ocean 2025 mobilized thousands of volunteers, delivered measurable environmental impact and strengthened a shared global commitment to protecting the planet from land to sea.

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Case studies

World Cleanup Day

World Cleanup Day 2025 mobilized employees in 80 locations across 30 countries to make a truly global impact. More than 1,800 employees contributed close to 4,800 volunteer hours, taking part in around 80 cleanup and sustainability activities.

16,400kg+ waste collected

22.7k+ cigarette butts collected

3.2k+ trees planted

440kg+ clothing collected

Key actions included beach, river, park and urban cleanups, resulting in the removal of over 16 tonnes of waste, including more than 22,000 cigarette butts. These activities ran alongside large-scale clothing and textile collections that supported circular economy initiatives. Employees also planted over 3,000 trees, supported habitat restoration, and engaged in waterway cleanups by foot and kayak.

Beyond cleanups, teams ran upcycling workshops, textile recovery visits, bottle-cap recycling initiatives, sustainability awareness sessions and virtual events, reinforcing long-term behavior change.

Activities were delivered in partnership with numerous NGOs and community organizations, combining hands-on action with education and engagement.

World Cleanup Day 2025 demonstrated strong employee commitment, cross-regional collaboration, and meaningful progress toward environmental stewardship and community impact goals.



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Case studies

Global Giving Month

Global Giving Month 2025 mobilized employees worldwide to support communities through volunteering, fundraising and in-kind donations, with a strong focus on community care, inclusion, health, education and sustainability.

10k+ participants

990+ volunteer days and **15k+** volunteer hours

$156k+ donated through employee fundraising

Initiatives included:

- **Community and holiday support:** Food, toy and clothing drives; Christmas gift campaigns (for example shoebox initiatives, “Rain of Presents” across DACH); Adopt-a-Family and school-kit donations
- **Health and wellbeing:** Blood-donation camps, support for cancer charities, and hunger-relief programs
- **Education and digital inclusion:** School rebuilding and classroom upgrades, laptop/iPad donations, mentoring and skills-based volunteering
- **Environment and sustainability:** World Cleanup Day activities, eco-runs, recycling and waste-reduction initiatives
- **Inclusion and empowerment:** Activities benefiting children with disabilities, vulnerable families, women’s empowerment and inclusive sports

Global reach

Activities took place across APAC, Europe and LATAM, North America and MEA, engaging offices in more than 40 countries and partnering with a wide network of NGOs and community organizations (for example Salvation Army, Club Rainbow, Project Pearls, Operation Smile).

Thousands of beneficiaries were supported through food, gifts, education, health services and environmental action.

Global Giving 2025 demonstrated strong employee engagement and tangible, locally relevant impact, reinforcing NTT DATA’s commitment to social impact and sustainable communities worldwide.

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Case studies

Global Volunteer Month

Global Volunteer Month 2026 saw strong global participation and diverse, purpose-driven volunteer action in all our regions.

74 volunteer events

30 countries

2.7k+ volunteer

5k+ volunteer hours

Key activity themes

- Education and youth empowerment: STEM clubs, school-kit assembly, mentoring programs (for example Technovation Girls, Púlsar), mural painting, and infrastructure upgrades benefiting thousands of government school students
- Health and wellbeing: Blood-donation drives (Singapore, Vietnam, UK, Canada), cancer-support activities, mindfulness workshops and awareness sessions (for example air-pollution education)
- Food security and community care: Meal preparation and distribution through partners such as Ronald McDonald House, FareShare, Willing Hearts and EatUp, delivering thousands of meals to vulnerable families
- Environmental action: Tree planting, reforestation, seed ball and bokashi ball initiatives, e-waste recycling, coastal clean-ups and urban biodiversity projects
- Inclusion and social impact: Support for persons with disabilities, orphaned children, seniors and underserved communities through skills-based volunteering, donations and long-term partnerships
- Humanitarian and digital support: Mapathon initiatives creating critical data for disaster response and crisis-affected regions

Overall impact

- Directly supported over 11,000 people, including students, families, patients, seniors, and communities affected by inequality or disaster
- Raised significant funds for health and humanitarian causes and strengthened long-term NGO partnerships
- Reinforced a culture of skills-based, local and sustained volunteering, with many activities designed for ongoing impact beyond the month itself

Global Volunteer Month 2026 demonstrated how coordinated global momentum, combined with strong local ownership, can deliver tangible social, environmental and educational impact at scale.



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Case studies

Creating social value

Transforming chronic disease care with AI Hospital Assistant in Denmark

The AI Hospital Assistant, developed by NTT DATA Business Solutions, supports patients with chronic diseases, particularly chronic obstructive pulmonary disease (COPD).

A conversational, human-like digital interface guides patients through treatment steps, provides reminders, offers instructional content and enables interaction through natural communication. It is designed to complement existing remote-monitoring systems and improve accessibility for patients with low digital literacy or physical impairments.

The program targeted elderly COPD patients in the Region of Zealand's pre-care clinic, a group often facing low digital literacy and physical limitations. The number of people impacted cannot yet be quantified because the solution has not been deployed at scale, but initial results from the pilot include:

- 50% reduction in hospitalization rates in the monitored COPD program
- Improved patient confidence and social activity

Greater digital inclusion of patients with low digital skills or physical limitations

The solution combines technology with human-centered design, enabling interaction through both verbal and nonverbal communication. By complementing remote-care processes, it aims to improve patient engagement and accessibility while supporting healthcare professionals in the delivery of care.

This scalable innovation reflects NTT DATA's commitment to inclusion, technological leadership and delivering meaningful societal impact.

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Child Focus: Technology, awareness and innovation (Belgium)

NTT DATA has been supporting Child Focus in Belgium for the past four years through a growing partnership focused on protecting children in an increasingly digital world. The support combines technology, volunteering, awareness and innovation. Two key pillars of this support are the Hackathon and IT services.

Child Focus addresses urgent and growing issues linked to missing children, child abduction, sexual exploitation and online harm. In Belgium, these cases have increased significantly in recent years, while digital platforms, social media and AI technologies have made the risks more complex and harder to address.

Our contribution helps Child Focus strengthen both its preventive and operational capabilities. IT services strengthen Child Focus' cyber resilience and operational effectiveness through penetration testing, technical support, service delivery and AI enablement. Awareness workshops and educational actions help children use the internet more safely and responsibly.

Hackathon

Through the hackathon, more than 100 participants came together to develop innovative technology solutions addressing Child Focus' most pressing challenges, including safer ways for children to report abuse, protecting analysts' mental health and balancing privacy with protection. This led to ideas and prototypes allowing children to report incidents safely, as well as concepts linked to awareness tools and privacy-compliant detection technologies.

IT services for Child Focus

In addition, we have been providing ongoing IT services to Child Focus. This includes full penetration testing of their systems, technical support for encryption technologies, the creation of a service catalog for smaller IT support requests, and monthly follow-up meetings to ensure continued practical support. More recently, the collaboration has expanded into generative AI enablement, including AI policy design, governance support and AI training for Child Focus teams.

We also support Child Focus through Internet Safe and Fun workshops, Safer Internet Day initiatives, and participation in community fundraising and awareness actions such as the 20km de Bruxelles in support of Miles for the Missing. So far over 12,000 students have been reached through the Internet Safe and Fun workshops.

Together, these activities support Child Focus in protecting children more effectively in a digital world.



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Case studies



Building a junior secondary school in partnership with Street Child (Sierra Leone)

NTT DATA, in partnership with international children's charity Street Child, committed to funding and building a junior secondary school in the remote village of Mandinboh, Sierra Leone, a community that previously had no access to secondary education.

The initiative included:

- Construction of classrooms
- Installation of sanitation facilities (latrines and water pump)
- Teacher training
- Community-led income-generating initiatives to ensure long-term sustainability of the school

The project was funded primarily through employee-led fundraising initiatives across NTT DATA UK and Ireland, supported by senior leadership participation and stakeholder engagement activities.

Overcoming barriers to education in rural areas

Sierra Leone faces significant barriers to secondary education in rural areas, where communities often have access to primary schools only. Children who complete primary education are frequently forced to drop out due to affordability, and a lack of infrastructure and trained teachers.

This initiative directly addresses these challenges by:

- Providing the first-ever secondary school in the community
- Reducing dropout rates after primary education
- Supporting local economic resilience through income-generating programs that fund teacher salaries and school maintenance

Impact

- £55,000–£60,000+ raised through employee fundraising
- School capacity: 100+ students annually
- Improved access to education, clean water, hygiene facilities and trained teachers
- Strong employee engagement and leadership participation

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Case studies

IoT-enabled resource optimization for The Akshaya Patra Foundation (TAPF) (India)

The Akshaya Patra Foundation (TAPF) in India operates large-scale kitchens serving millions of meals each day. Our Kitchen 2.0 digital transformation initiative uses IoT-enabled monitoring resources to improve the management of essential resources, such as water and fuel, in these kitchens.

A new solution for managing essential resources

Manual processes for monitoring these resources created operational inefficiencies and difficulties in identifying leakages or irregular consumption. With the expansion of the PM POSHAN Scheme, the Government of India's flagship school midday meal program, the need for a better process became increasingly clear.

NTT DATA developed a solution that included real-time tracking, data-driven insights and IoT-enabled monitoring systems, improving operational control and kitchen management while reducing resource wastage.

We deployed smart sensors and monitoring systems in all kitchens operated by TAPF to closely track critical resources. These systems provide real-time insights into water levels, flow rates and leak detection. They also support fuel-level monitoring, deliver usage trends and send alerts for anomalies that indicate potential pilfering. All data is integrated into centralized digital dashboards, enabling both real-time visibility and historical analysis to support informed decision-making and stronger operational control.

Quantitative impact

Kitchen 2.0 — Category A (Water):

- Potential to support 400 additional students annually.
- Contributed to environmental benefits across 15 kitchens through improved water efficiency.
- Total estimated impact value: ₹10,76,36,911.

Kitchen 2.0 — Category B (Fuel):

- Potential to support 2,400 additional students annually.
- Contributed to reduced environmental footprint across 15 kitchens through optimized fuel usage.
- Total estimated impact value: ₹12,29,78,436.
- Combined, the project demonstrates the potential to support 2,800 additional students per year through improved resource efficiency.

Qualitative impact

- Enhanced resource optimization (water and fuel) through IoT-enabled monitoring systems
- Significant reduction in environmental footprint across kitchen operations
- Improved operational efficiency and cost savings, enabling reinvestment into feeding more children
- Strengthened delivery and scalability of meals under the PM POSHAN Scheme implemented by TAPF

Kitchen 2.0 has helped to improve the way kitchens manage critical resources, supporting more sustainable operations while strengthening the reliable and efficient delivery of nutritious meals to children under the PM POSHAN Scheme. By applying digital innovation to solve grassroots challenges, we have shown how technology contributes to strengthening social impact.

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Teaming: A donation platform for any person and any cause (Spain)

Developed in 2012 with the support of NTT DATA as co-founder, Teaming is a digital, open, accessible and scalable solidarity donation platform available for any person and any cause. It manages recurring micro-donations efficiently and securely, and now supports the largest donor community in Spain.

Transforming one-off donations into long-term commitment

The model is based on three pillars: simplicity and cooperation (€1 per month), no commissions, and recurrence. This approach transforms one-off donations into long-term commitment, strengthening the stability and sustainability of social causes.

Another distinguishing feature of the model is its horizontal nature: Everyone contributes the same amount, and projects of all sizes can access funding, technological tools and training. In this way, Teaming not only channels resources but also helps reduce the digital divide and promotes collective cooperation.

A platform that evolves for greater impact

Teaming has evolved to incorporate training for organizations, placing donors at the center, and fostering an active and committed community. Thanks to NTT DATA's key role as a leading trustee, it continues to advance by integrating new technologies — such as AI — to optimize processes and enhance the user experience. We are also promoting a redesign of the platform to reinforce transparency, trust and value creation for both Teamers and social entities.

Results in numbers

- Growth in fundraising from €66,000 in the first year to €11.5 million in the last financial year, surpassing €1 million per month in Q4
- A 100% free model, ensuring that every euro donated goes directly to the causes
- Access to funding for over 12,000 social projects, particularly important for those facing greater barriers to traditional financing channels
- Promotion of digitalization within the solidarity sector, enhancing visibility, donor recruitment and donor management
- Creation of an international donor community with high recurrence and commitment (450K+ Teamers across Europe; 60% in Spain; 40% mainly in Germany, France and Italy)
- 454,656 Teamers (donors)
- 12,058 Solidarity projects

Teaming demonstrates how the combination of purpose-driven technology and cooperation can contribute to sustainable development and redefine the way society collaborates.

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Case studies

Solidarios sin fronteras: How the Teaming platform transforms micro-initiatives into sustainable, high-impact sustainable solutions

In a context of extreme humanitarian crisis—where more than 17.8 million people in Yemen lack access to safe drinking water — Solidarios Sin Fronteras, a micro-NGO run by just three volunteers, has launched a critical water-supply project in camps for internally displaced persons (IDP) thanks to Teaming, the platform co-founded by NTT DATA, which serves as the leading trustee.

Through its recurring micro-donation model (€1 per month), Teaming has enabled the organization to build a stable and reliable funding base — essential for a project in which continuity of service is vital.

In addition, Teaming's technology and international reach have facilitated connections with donors across Europe. Features such as eurozone payment operations, multilingual access, and recommendation systems have expanded the project's visibility and support far beyond its local environment.

Results in numbers

- 2,495 Teamers (donors)
- 2,833 people a month receive clean drinking water
- €233,369 raised since inception
- 50% of the project's funding is channeled through Teaming
- Growth from 2 active water tanks in 2016 to 17 in 2026, ensuring a continuous water supply
- Distribution of more than 272,000 liters of water per month to over 2,800 people in displacement camps and schools
- Activation of an international community of nearly 2,500 Teamers, recruited and managed entirely through the platform

Through a combination of technology and social innovation, NTT DATA has helped transform a grassroots initiative into a scalable, sustainable and high-impact solution.



Non-disclosures

People-centric Company & Health and Safety

This statement has been published on a voluntary basis in advance of the Company's anticipated mandatory application of the Corporate Sustainability Reporting Directive (CSRD), which is expected to apply to reporting on FY27 data.

The non-disclosure of certain data points listed is due to the transitional implementation of CSRD-aligned reporting systems, methodologies, governance frameworks, internal controls and assurance processes, as well as limitations in the current availability and maturity of certain data, methodologies and value chain information relevant to future alignment with the European Sustainability Reporting Standards (ESRS).

The identified data points remain material and are not omitted on the basis of immateriality. Their non-disclosure should not be interpreted as an indicator of the absence of relevant policies, actions, targets or management approaches.

The full list of these material non-disclosure data points, together with the stated basis for non-disclosure and an outline of the Group's intended commitment to future reporting, is provided in Annexure A: Non-disclosure data points.

→ Annexure A: Non-disclosure data points.

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Business conduct



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Code of Business Ethics

[G1-1]

Our Code of Business Ethics is addressed in detail in the introduction to this report.

→ Code of Business Ethics

Prevention and detection of corruption and bribery

[G1-3]

All employees are required to complete the annual global NTT DATA Code of Business Ethics training, which includes dedicated content on antibribery and anticorruption principles, in line with the Code and applicable legal and regulatory requirements.

In addition, secondary standalone mandatory training focused exclusively on bribery and corruption is delivered annually. This training provides more in-depth coverage of bribery and corruption risks, including prohibited conduct, gifts and hospitality, conflicts of interest, and reporting and escalation mechanisms.

Non-disclosures

Business conduct

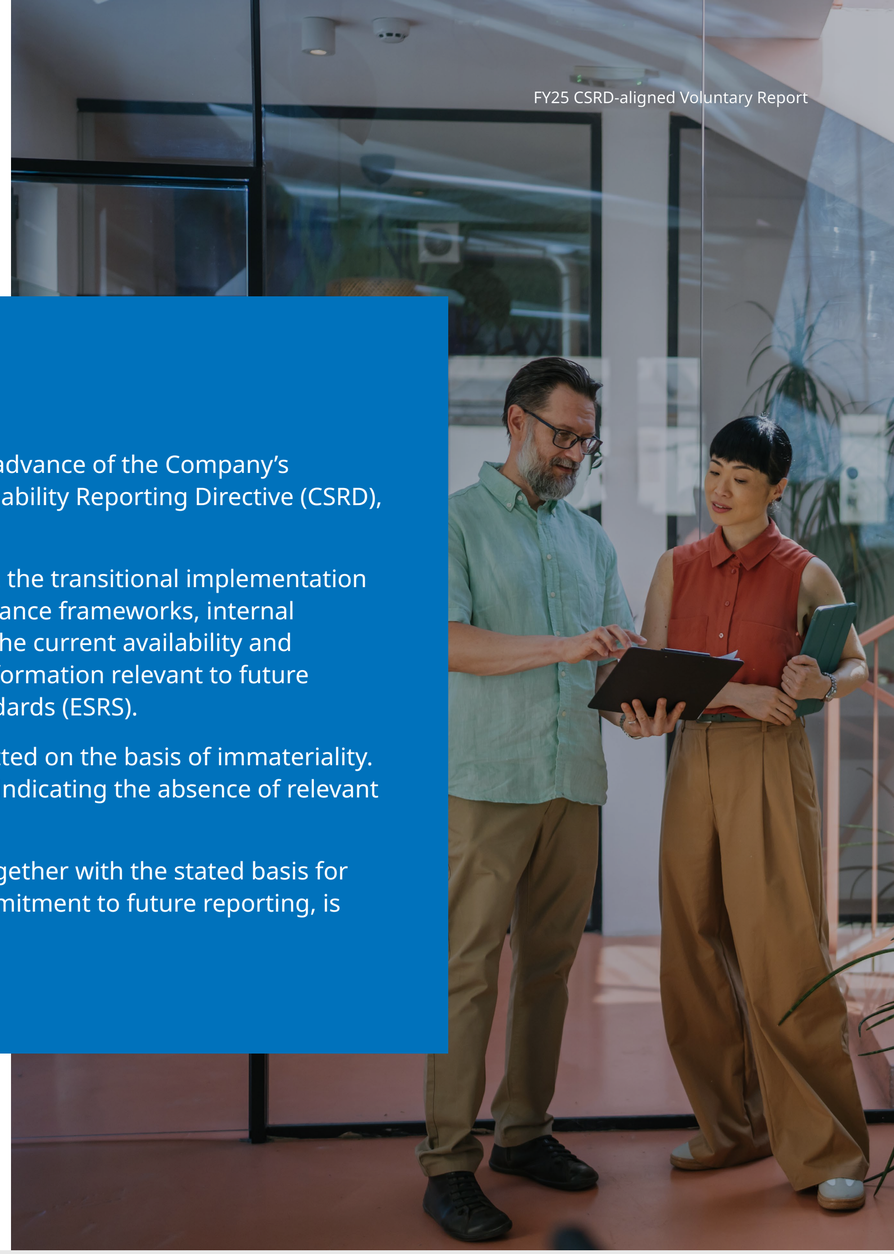
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The non-disclosure of the data points listed reflects, in part, the transitional implementation of CSRD-aligned reporting systems, methodologies, governance frameworks, internal controls and assurance processes, as well as limitations in the current availability and maturity of certain data, methodologies and value chain information relevant to future alignment with the European Sustainability Reporting Standards (ESRS).

The identified data points remain material and are not omitted on the basis of immateriality. Their non-disclosure should not be interpreted, in itself, as indicating the absence of relevant policies, actions, targets or management approaches.

The full list of these material non-disclosure data points, together with the stated basis for non-disclosure and an outline of the Group's intended commitment to future reporting, is provided in Annexure A: Non-disclosure data points.

→ **Annexure A:** Non-disclosure data points.

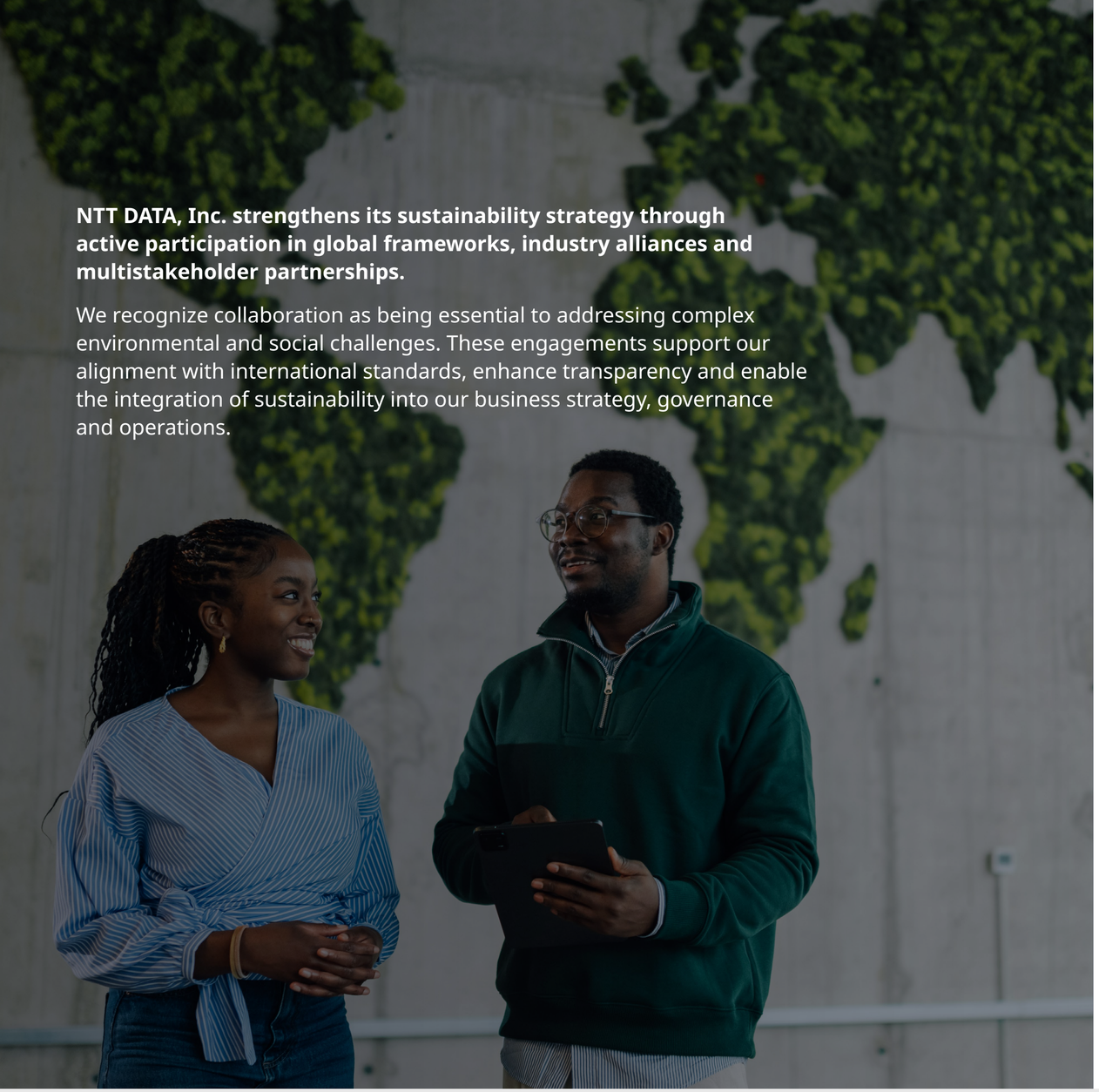


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Sustainability partnerships and memberships



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NTT DATA, Inc. strengthens its sustainability strategy through active participation in global frameworks, industry alliances and multistakeholder partnerships.

We recognize collaboration as being essential to addressing complex environmental and social challenges. These engagements support our alignment with international standards, enhance transparency and enable the integration of sustainability into our business strategy, governance and operations.

Global frameworks

United Nations Global Compact

At the core of this approach is participation in the United Nations Global Compact (UNGC). NTT DATA aligns its operations and strategy with the Ten Principles on human rights, labor, environment and anticorruption, while contributing to the United Nations Sustainable Development Goals (SDGs).

This commitment is reinforced through active involvement in UNGC accelerator programs, including the Target Gender Equality Accelerator and the Climate Ambition Accelerator, which support the development of science-based climate targets, strengthen gender-equality initiatives and build organizational capacity through peer learning and expert guidance.

Participation in the UN Global Compact Network Germany e.V., as a founding member, further demonstrates our proactive role in shaping national sustainability ecosystems and contributing to collective action.

Sustainability-led organizations

NTT DATA is a member of established sustainability-led organizations. Through our active participation in different working groups and forums, we aim to contribute to the latest discussions, foster collaboration, drive innovation, and support thought leadership on these topics, strengthening our commitment in the areas of sustainability, climate and nature action.

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World Business Council for Sustainable Development (WBCSD)

Member since June 2025

Participation in the WBCSD, a CEO-led community of more than 250 leading global businesses working together to accelerate the transition to a net-zero, nature-positive and more equitable future, enables NTT DATA to contribute to cross-sector collaboration and global dialogue on sustainability.

NTT DATA actively participates in three WBCSD imperatives: Climate Action, Nature Action, and Circular Products and Materials. This engagement is aligned with our sustainability strategy and supports our efforts to integrate sustainability more deeply into business planning, decision-making and solution development.

Through our participation, we share our sustainability initiatives, digital solutions and practical experience to support WBCSD workstreams and discussions with member companies. These engagements also enable us to learn from global peers, foster collaboration, explore innovation opportunities and contribute to ongoing thought leadership and the exchange of knowledge that supports the transition to a more sustainable society.

World Economic Forum (WEF)

NTT DATA is a member of the WEF and participates in the Centre for Nature and Climate, which works to support the transition to people- and planet-positive economies, driving shared prosperity within planetary boundaries. NTT DATA also participates in several strategic initiatives and discussions through the Alliance of CEO Climate Leaders, Champions for Nature, Nature Positive Transitions as well as the CXO Community for Chief Sustainability Officers.

Following our contribution to the publication “Nature Positive: Role of the Tech Sector” last year, under the Nature Positive Transitions initiative, we are contributing to a new paper, “Green and Resilient Data Centers: A Playbook for Future-ready Infrastructure”. This paper aims to define regional archetypes for green and resilient data centers and provide a practical playbook for decision-makers in technology, finance and policy. It will explore how considerations such as nature, water, land use and regional context can be integrated into data center infrastructure decisions.

→ Nature Positive: Role of the Tech Sector

Biodiversity Credit Alliance (BCA)

Member since January 2025

The BCA exists to provide guidance for the establishment of a credible and scalable biodiversity credit market.

The mission of the BCA is to:

1. Help steer the development of a biodiversity credit market by building a framework of high-level, science-based principles
2. Provide guidance and encourage best practice for market participants in applying these principles, empowering them to achieve and maintain equitable, high-quality transactions that meet strict integrity criteria.

With over 500 members and a vision to be a transparent, trustworthy and efficient global market in biodiversity credits, the BCA is founded on just and equitable principles and underpinned by innovation.

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Industry platforms and technology partners

EU Data Center Association (EUDCA)

IntegrityNext

Our involvement in industry platforms supports the development of best practices, standards and policy recommendations for energy-efficient and low-carbon digital infrastructure. Leadership roles within these forums, including contributions to working groups on sustainability metrics, further reinforce NTT DATA's role in shaping industry-wide transition pathways.

We also collaborate with specialized platforms and advisory organizations to enhance transparency and accelerate decarbonization. Engagement with supply chain transparency platforms such as IntegrityNext enables the disclosure of sustainability performance data to clients and partners, strengthening trust and accountability.

Complementing these efforts, we collaborate with industry and technology partners to drive circular economy innovation and responsible resource management. Partnerships focused on recycling, reuse and sustainable material recovery contribute to waste reduction, resource efficiency and the advancement of zero-waste-to-landfill approaches. Engagement in broader sustainability and data center associations in multiple regions further supports knowledge sharing and alignment with evolving regulatory frameworks and best practices.

Development and advisory partners

Schneider Electric

Cisco Sustainability

Partnerships with ESG advisory providers and organizations such as Schneider Electric and Cisco Sustainability support the development of renewable energy strategies and decarbonization initiatives, including power purchase agreement (PPA) exploration and emissions-reduction planning.

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Benchmarking initiatives and alliances

Career and Inclusion Index

Employers for Equality

PROUT AT WORK (PROUT EMPLOYER)

Charta der Vielfalt

Engagements in these initiatives support continuous improvement in diversity, equity and inclusion practices by providing benchmarking insights, fostering knowledge exchange and reinforcing inclusive workplace policies.

UN Women

Pride Connection

Instituto Más Mujer

Collaboration with organizations such as these further strengthens efforts to promote gender equality, support LGBTQ+ inclusion, and advance diversity across the workforce.

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Digital inclusion, skills development and societal impact

Talento Tech

Olimpíada Nacional de Inteligência Artificial (ONIA)



AIM Global Alliance

Through initiatives such as Talento Tech and the Olimpíada Nacional de Inteligência Artificial (ONIA), we support the development of digital skills and employability, particularly for early-career talent, while contributing to a more inclusive digital economy. Strategic alliances such as the AIM Global Alliance, developed by the United Nations Industrial Development Organization (UNIDO), foster cross-sector collaboration to address global development challenges and advance sustainable innovation.

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Local multistakeholder initiatives

Green Your Future, Romania

At a local level, NTT DATA participates in multistakeholder initiatives designed to accelerate the transition to low-carbon and climate-neutral economies. Engagement in these initiatives supports knowledge exchange, stakeholder collaboration and the development of practical pathways toward climate neutrality.

NTT DATA Group Corporation memberships

- United Nations Global Compact (UNGC)
- Women's Empowerment Principles (WEPs)
- World Economic Forum (WEF), including the CEO Alliance on Nature
- Business for Social Responsibility (BSR)
- Green Software Foundation
- World Business Council for Sustainable Development (WBCSD)
- SustainableIT.org
- Science Based Targets initiative (SBTi)
- 30 by 30 Alliance
- Circular Partner
- Sustainable Plastics Initiative (SusPla)
- CDP Gold Accredited Partner

The value of partnership

Collectively, these partnerships and initiatives demonstrate our commitment to advancing sustainability through collaboration, transparency and innovation. They also give us visibility in the market on topics we are actively involved in, either through our own efforts as an organization or through the services we provide for our clients and partners. By leveraging global frameworks, contributing to industry initiatives and engaging with organizations that align with our aims and focus areas, we are strengthening our ability to address sustainability challenges at scale. This integrated approach allows us to engage with peers and share our expertise in these fields, supporting long-term value creation while contributing to a more sustainable, inclusive and resilient global economy.

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Recognition from industry analysts

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Recognition from industry analysts

Everest Group

Leader and Star performer in Everest Group's Net-Zero Consulting Services PEAK Matrix® Assessment, 2025:

- Y axis: It measures the impact created in the market, captured through 3 dimensions (market adoption, portfolio mix, value delivery)
- X axis: It measures the ability to deliver services successfully, captured through 4 dimensions (vision and strategy, scope of services offered, innovation and investments, delivery footprint)
- Comparison to previous assessment: Moved from Major Contender to Leader
- Distinguished features of market impact: Greater value delivery through improved client satisfaction and expanded client engagements
- Distinguished features of capability advances: Expanded its sustainability solution portfolio with new offerings in ESG reporting, smart-building optimization, sector-specific decarbonization playbooks and resource management

Forrester

Leader in The Forrester Wave™: IT Sustainability Services, Q1 2026

- Y axis: Strength of offering (IT carbon-footprint calculation tools, Supporting IT sustainability tools and accelerators, Materiality impact assessments, Water management, Energy management, Carbon Usage Effectiveness, Renewable energy procurement, Lifecycle emissions, Embodied carbon emissions, Software development and enterprise application, Asset recycling and decommissioning, E-waste management, IT supply chain decarbonization, Collecting and cleaning data for compliance, Climate risk assessments for IT infrastructure)
- X axis: Strength of strategy (Vision, Innovation, Partner ecosystem, Pricing flexibility and transparency, Supporting services and offerings, Talent strategy)
- Comparison to previous assessment: Same position
- NTT DATA offers a comprehensive sustainable IT services portfolio as well as developer- and sustainability-focused IT tools that enable scenario analysis, resource optimization and integration with third-party platforms.
- NTT DATA demonstrated distinction in developing proprietary assets, client co-innovation and regional capabilities in areas such as energy-efficient IT systems, carbon-footprint tracking tools and smart infrastructure solutions.

NTT DATA, Inc. was named a Leader in the ISG Provider Lens® 2025 for Digital Sustainability, covering both industry-specific and IT sustainability services in Europe.

ISG

Leader in ISG Provider Lens® (IPL) Quadrant Study on 'Digital Sustainability 2025' in the US and Europe (OT and industry-specific solutions, and IT solutions and services)

- Y axis: It measures portfolio attractiveness (scope of portfolio, portfolio quality, strategy and vision, local characteristics)
- X axis: It measures competitive strength (market position, brand reputation, core competencies, go to market)
- Comparison to previous assessment: Same position
- NTT DATA is notable for circular IT engineering, low-power AI models and inclusive device lifecycle services that align with Europe's sustainability and accessibility mandates
- NTT DATA's expansion into forestry, circular biofuels and food supply chain domains demonstrates its growing relevance in Europe's OT landscape, where nature-based solutions and circularity are increasingly central to client sustainability strategies

IDC

Major Player in IDC MarketScape: Worldwide Carbon Management and Net-Zero Services 2025 Vendor Assessment

- Y axis: Capabilities
- X axis: Strategies
- NTT DATA's strengths lie in its organizational commitment to sustainability. While the sustainability practice is still relatively young, NTT DATA's development strategy shows strength and commitment to the continued development of sustainability-related services, and carbon management is one of the largest focus areas for the organization today.

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Recognition for sustainability efforts and solutions

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Recognition for sustainability efforts and solutions

During the reporting period, NTT DATA, Inc. received global, regional and industry recognition for our progress in advancing environmental sustainability, responsible technology and social impact. This external validation reflects our sustainability performance and the growing maturity of our ESG approach across operations and solutions.

Global recognition

Environmental performance

At a global level, we achieved significant recognition for our environmental performance:

- NTT DATA Group Corporation was included in the CDP's Climate Change "A List" for the fourth consecutive year and, for the first time, in the CDP Water Security "A List," highlighting strong performance in climate and water management.
- We were also recognized as a **CDP Supplier Engagement Leader** for our approach to value chain engagement.
- We maintained a **Silver rating from EcoVadis**, with strong performance in sustainable procurement recognized through an improved assessment score.

Sustainability solutions and innovation

- At the **Cisco Partner Summit 2025,** NTT DATA was named **Global Sustainability Partner** of the Year, part of a broader recognition that included multiple awards in innovation and partnership categories.
- NTT DATA Business Solutions received multiple **SAP Global Partner Awards 2026,** including recognition in the **Sustainability category,** for demonstrating measurable customer impact and for innovation in sustainable-by-design solutions, and was recognized as a **Microsoft Partner of the Year 2025 — Sustainability Changemaker** finalist.

Digital and sector-specific sustainability innovation

- The **iAgua Smart Company of the Year Award** acknowledged NTT DATA's work on the Spanish National Water Observatory project, developed in collaboration with the Spanish Ministry for the Ecological Transition and the Demographic Challenge.
- Collaboration on sustainable infrastructure projects contributed to high-level certifications such as the **BCA Green Mark Platinum Super Low Energy (SLE)** rating, reflecting excellence in energy-efficient building design and operation.

Sustainable procurement and governance

- NTT DATA achieved an **"Excellence" rating under UNE 15896 and** ISO **20400 Sustainable Procurement standards,** awarded by **AENOR and AERCE,** positioning the organization among those with the most mature and robust procurement systems assessed under this framework.
- Additional certifications such as ISO **14001 Environmental Management Systems** continued to confirm the effectiveness of structured environmental governance and continuous improvement processes.

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NTT DATA, Inc. certified as a Global Top Employer

The **Top Employers Institute (headquartered in Amsterdam, the Netherlands)** certifies organizations based on the results of its extensively researched HR Best Practices Survey, which is followed by a thorough evaluation by dedicated HR auditors. This comprehensive survey covers 20 topics under six HR domains, including people strategy, work environment, talent acquisition, learning, diversity and inclusion, and wellbeing.

In January 2026, NTT DATA was certified as a Global Top Employer 2026 for the third consecutive year, in 37 countries and regions. We achieved outstanding results for a range of practices the company has implemented consistently, many of which are not widely adopted in other organizations. These include candidate experience measurement, voice of the employee champions, employee listening strategies, and diversity and inclusion initiatives. These achievements demonstrate NTT DATA's commitment to fostering an inclusive workplace that respects every voice, listens with integrity and values both individual and collective contributions.

→ NTT DATA recognized as a Global Top Employer for third consecutive year



Regional and country recognition

Sustainability and social impact

- **APEE Social Responsibility and Sustainability Award** for community initiatives
- Recognition by **UNIDO** for contributions to sustainable industrial innovation
- Diversity and inclusion awards from organizations including Actiris, Employers for Youth (EFY), and the São Paulo State City Council for racial equality
- Recognition for digital accessibility through the UCL Sustainability Business Awards, highlighting the impact of inclusive technology initiatives such as Tech for All

Innovation and client delivery

- **Indian CSR Award for Best Flood Management Initiative**
- Industry acknowledgments for scalable digital sustainability solutions in areas such as smart infrastructure and data-driven environmental management
- **Innovations in CSR Practices Award for our Tech for Elephants project at the 17th CSR Summit & Awards by UBS Forums, a leading CSR platform in India**

Internal awards

- An internal Sustainability Award recognized the ICT Carbon Calculator project for advancing data-driven emissions management.
- Other projects, including the ESG platform selection initiative, were highlighted at the **NTT Group Sustainability Conference. Further recognition at the conference** included awards such as the Popular Vote Award for digital sustainability initiatives and Outstanding Performance recognition for technology-driven sustainability use cases.
- Individual leadership in sustainability was acknowledged through the **CIO Excellence Award 2025**, recognizing contributions to advancing IT sustainability strategy and impact.

This recognition demonstrates consistent progress in delivering sustainable outcomes across environmental, social and governance dimensions. From inclusion in leading global indices such as CDP, to industry awards from our partners and certifications from bodies such as AENOR, AERCE and ISO, we continue to strengthen our position as a trusted and innovative partner in sustainable transformation. This recognition also builds stakeholder confidence and highlights our commitment to embedding sustainability into our strategy, operations and solutions.

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External assurance and verification

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LRQA Independent Assurance Statement

Relating to NTT DATA, Inc., NTT Europe GDC s.r.o., NTT India GDC Private Limited, NTT Cloud Communications SAS, NTT Cloud Infrastructure, Inc., NTT Managed Services EMEA, S.A.U., NIVEUS SOLUTIONS PRIVATE LIMITED, NTT Managed Services Americas, LLC Environmental Data for the fiscal year 2025 (April 1, 2025 - March 31, 2026).

This Assurance Statement has been prepared for NTT DATA, Inc., NTT Europe GDC s.r.o., NTT India GDC Private Limited, NTT Cloud Communications SAS, NTT Cloud Infrastructure, Inc., NTT Managed Services EMEA, S.A.U., NIVEUS SOLUTIONS PRIVATE LIMITED, NTT Managed Services Americas, LLC as part of the NTT DATA, Inc. Group (NTT DATA, Inc.) in accordance with our contract.

Terms of Engagement

LRQA was commissioned by NTT DATA, Inc., to provide independent assurance of its greenhouse gas (GHG) emissions report (GHG Report) for April 1, 2025 - March 31, 2026 against the assurance criteria below to a limited level of assurance and the materiality of the professional judgement of the verifier using *The Greenhouse Protocol – A Corporate Accounting and Reporting Standard* (revised edition, Jan 2015) and ISO 14064 - Part 3 for greenhouse gas emissions. LRQA's verification procedure is based on current best practise and is in accordance with ISAE 3000 and ISAE 3410.

Our assurance engagement covered

NTT DATA, Inc., NTT Europe GDC s.r.o., NTT India GDC Private Limited, NTT Cloud Communications SAS, NTT Cloud Infrastructure, Inc., NTT Managed Services EMEA, S.A.U., NIVEUS SOLUTIONS PRIVATE LIMITED, NTT Managed Services Americas, LLC global operations and activities and specifically the following requirements:

- Verifying conformance with:
  - NTT DATA, Inc. GHG methodology and basis of reporting which was prepared based on *World Resources Institute / World Business Council for Sustainable Development Greenhouse Gas Protocol: A corporate accounting and reporting standard*, revised edition (otherwise referred to as the WRI/WBCSD GHG Protocol).
- Evaluating the accuracy and reliability of data and information for only the selected indicators listed below:
  - Direct (Scope 1) Emissions
  - Energy Indirect (Scope 2) Emissions and
  - Other Indirect (Scope 3) GHG emissions verified by LRQA only include:
    - Category 1 - Purchased goods and services emissions
    - Category 2 - Capital goods
    - Category 3 - Fuel- and Energy-Related Activities Not Included in Scope 1 or Scope 2
    - Category 4 - Upstream Transportation and Distribution
    - Category 6 - Business travel
    - Category 7 - Employee commuting
    - Category 9 - Downstream Transportation
    - Category 11 - Use of Sold Products
    - Category 12 - End-of-Life Treatment of Sold Products
    - Category 13 – Downstream Leased Assets
    - Category 15 - Investment

LRQA's responsibility is only to NTT DATA, Inc., LRQA disclaims any liability or responsibility to others as explained in the end footnote. NTT DATA, Inc., NTT Europe GDC s.r.o., NTT India GDC Private Limited, NTT Cloud Communications SAS, NTT Cloud Infrastructure, Inc., NTT Managed Services EMEA, S.A.U., NIVEUS SOLUTIONS PRIVATE LIMITED, NTT Managed Services Americas, LLC responsibility is for collecting, aggregating, analysing, and presenting the environmental data and information relating to its operations within the Report. NTT DATA, Inc. is responsible for the aggregation, approval of the Group Report and for maintaining effective internal controls over the systems from which the Report is derived.

Ultimately, the Report has been approved by, and remains the responsibility of NTT DATA, Inc.

LRQA's Opinion

Based on LRQA's approach nothing has come to our attention that would cause us to believe that NTT DATA, Inc., NTT Europe GDC s.r.o., NTT India GDC Private Limited, NTT Cloud Communications SAS, NTT Cloud Infrastructure, Inc., NTT Managed Services EMEA, S.A.U., NIVEUS SOLUTIONS PRIVATE LIMITED, NTT Managed Services Americas, LLC has not, in all material respects:

- Met the requirements of the criteria listed above; and
- Disclosed accurate and reliable performance data and information as summarized in Tables below.

The opinion expressed is formed on the basis of a limited level of assurance[1] and at the materiality of the professional judgement of the verifier.

[1] *The extent of evidence-gathering for a limited assurance engagement is less than for a reasonable assurance engagement. Limited assurance engagements focus on aggregated data rather than physically checking source data at sites. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.*

Table 1. Summary of NTT DATA, Inc. GHG Emissions for April 1, 2025- March 31, 2026

FY25 NTT DATA, Inc. GHG Emissions	Metric Tonnes CO_2e (Market based)	Metric Tonnes CO_2e (Location based)	Metric Tonnes CO_2e (Non-Kyoto Gasses)
Scope 1- GHG emissions	**42,380**	**42,380**	**496**
Stationary combustion (boilers and generators)	16,459	16,459	
Mobile combustion (fleet vehicles)	13,414	13,414	
Fugitive emissions of HFCs gases (HVAC equipment)	12,507	12,507	496
Scope 2- GHG emissions	**219,236**	**742,425**	
Purchased electricity	216,117	739,943	
Purchased steam, heating and cooling	1,332	1,332	
Mobile electric fleet	1,787	1,150	
Scope 3- GHG emissions	**5,218,737**	**5,805,731**	**<1**
1. Purchased goods and services	1,474,171	1,474,171	
2. Capital goods	165,652	165,652	
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	225,565	298,628	
4. Upstream transportation and distribution	31,794	31,794	
5. Waste generated in operations			
6. Business travel	29,703	29,701	
7. Employee commuting	125,615	124,488	
8. Upstream leased assets			
9. Downstream transportation	1,062	1,062	
10. Processing of sold products			
11. Use of sold products	2,132,136	2,132,136	
12. End-of-life treatment of sold products	4,079	4,079	
13. Downstream leased assets	982,296	1,492,498	
14. Franchises			
15. Investment	46,664	51,523	<1
Total GHG emissions	**5,480,353**	**6,590,537**	**496**

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Table 2. Summary of Consumed Energy Sources for the purposes of CDP Reporting for April 1, 2025 - March 31, 2026.

Consumed Energy Sources	MWh
Consumption of fuel from non-renewable sources	125,006
Consumption of fuel from renewable sources	925
Consumption of purchased/acquired cooling from non-renewable sources	1,095
Consumption of purchased/acquired electricity from non-renewable sources	456,891
Consumption of purchased/acquired electricity from renewable sources	1,081,655
Consumption of purchased/acquired heat from non-renewable sources	10,543
Consumption of purchased/acquired steam from non-renewable sources	144
Consumption of self-generated non-fuel renewable energy	1,983
Total energy consumption from renewable sources	1,084,563
Total energy consumption from non-renewable sources	593,678
Total of all energy sources	**1,678,241**

Table 3. Summary of NTT Europe GDC s.r.o., NTT India GDC Private Limited Emissions for April 1, 2025- March 31, 2026.

FY25 NTT Europe GDC s.r.o., NTT India GDC Private Limited GHG Emissions	Metric Tonnes CO_2e (Market based)	Metric Tonnes CO_2e (Location based)
Scope 1- GHG emissions	**5**	**5**
Stationary combustion (boilers and generators)	5	5
Mobile combustion (fleet vehicles)		
Fugitive emissions of HFCs gases (HVAC equipment)		
Scope 2- GHG emissions	**788**	**775**
Purchased electricity	787	773
Purchased steam, heating and cooling	1	1
Mobile electric fleet		
Scope 3- GHG emissions	**2,366**	**2,367**
1. Purchased goods and services	542	542
2. Capital goods	168	168
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	360	364
4. Upstream transportation and distribution	13	13
5. Waste generated in operations		
6. Business travel		
7. Employee commuting	1,138	1,136
8. Upstream leased assets		
9. Downstream transportation		
10. Processing of sold products		
11. Use of sold products	141	141
12. End-of-life treatment of sold products	3	3
13. Downstream leased assets		
14. Franchises		
15. Investment		
Total GHG emissions	**3,159**	**3,147**

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Table 4. Summary of NTT Cloud Communications SAS, NTT Cloud Infrastructure, Inc., NTT Managed Services EMEA, S.A.U., NIVEUS SOLUTIONS PRIVATE LIMITED, NTT Managed Services Americas, LLC ´GHG Emissions for April 1, 2025- March 31, 2026.

FY25 NTT Cloud Communications SAS, NTT Cloud Infrastructure, Inc., NTT Managed Services EMEA, S.A.U., NIVEUS SOLUTIONS PRIVATE LIMITED, NTT Managed Services Americas, LLC ´GHG Emissions	Metric Tonnes CO_2e (Market based)	Metric Tonnes CO_2e (Location based)
Scope 1- GHG emissions	**57**	**57**
Stationary combustion (boilers and generators)	57	57
Mobile combustion (fleet vehicles)		
Fugitive emissions of HFCs gases (HVAC equipment)		
Scope 2- GHG emissions	**1,745**	**1,650**
Purchased electricity	1,712	1,617
Purchased steam, heating and cooling	34	34
Mobile electric fleet		
Scope 3- GHG emissions	**16,906**	**16,873**
1. Purchased goods and services	8,153	8,153
2. Capital goods	2,309	2,309
3. Fuel and energy-related activities (not included in Scope 1 or Scope 2)	449	443
4. Upstream transportation and distribution	6	6
5. Waste generated in operations		
6. Business travel		
7. Employee commuting	3,889	3,873
8. Upstream leased assets		
9. Downstream transportation		
10. Processing of sold products		
11. Use of sold products	181	181
12. End-of-life treatment of sold products	<1	<1
13. Downstream leased assets	1,920	1,908
14. Franchises		
15. Investment		
Total GHG emissions	**18,709**	**18,581**

LRQA's Approach

LRQA's assurance engagements are carried out in accordance with our verification procedure. The following tasks were undertaken as part of the evidence gathering process for this assurance engagement:

- Reviewing NTT DATA, Inc. Methodology and documented procedures
- Interviewing relevant employees of the organization responsible for managing GHG emissions data.
- Verifying GHG emissions data and records at an aggregated level for the reporting period April 1, 2025 - March 31, 2026.
- Sampling raw data submissions.
- Verifying emission factors used with the source reference and confirming their appropriateness.
- Verifying underlying calculations and formulae.
- Assessing NTT DATA, Inc., data management systems to confirm they are designed to prevent significant errors, omissions, or misstatements in the Report.

Observations

Further observations and findings, made during the assurance engagement, are:

- NTT DATA, Inc GHG methodology and basis of reporting GHG Emissions Methodology can improve further to demonstrate the process of data quality checks carried out from the ESG platform output focussing on data input, activity data, emission factor applied and completeness of reporting.
- Application of emissions extrapolation based on a 2023/2024 data centre data as a proxy for scope 3-category 2 Capital goods and services should be kept to a minimum to maximise the actual data reporting.
- Re-baselining calculations for FY 2021 are overdue.
- It is highly recommended that the organisation demonstrate full traceability of the calculation approach and emission factor methodologies across all scopes and categories.
- Take steps to report Category 5 Waste generated in operations separately.
- The organisation should improve the process of assigning labels such as Business Unit, Region, Country to capture the Business Unit, Region, Country level granular reporting.

LRQA's Standards and Competence

LRQA implements and maintains a comprehensive management system that meets accreditation requirements for ISO 14065 Greenhouse gases – *Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition* and *ISO/IEC 17021 Conformity assessment – Requirements for bodies providing audit and certification of management systems* that are at least as demanding as the requirements of the International Standard on Quality Control 1 and comply with the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants.

LRQA ensures the selection of appropriately qualified individuals based on their qualifications, training and experience. The outcome of all verification and certification assessments is then internally reviewed by senior management to ensure that the approach applied is rigorous and transparent.

The verification assessment is the only work undertaken by LRQA for NTT DATA, Inc and as such does not compromise our independence or impartiality.

Signed Dated: July 21, 2026

Sujatha Ramasamy
LRQA Lead Verifier
On behalf of LRQA, 1 Trinity Park, Bickenhill Lane, Birmingham, UK

LRQA reference: LRQ00005180

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Abbreviations

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Abbreviations

AI	artificial intelligence
ANZ	Australia and New Zealand
APAC	Asia Pacific
BCA	Biodiversity Credit Alliance
BoR	basis of reporting
BPO	business process outsourcing
BREEAM	Building Research Establishment Environmental Assessment Method
CAPA	corrective and preventive action
CDP	Carbon Disclosure Project
CDR	carbon dioxide removal
CEO	Chief Executive Officer
CIO	Chief Information Officer
CMDB	configuration management database
CO_2	carbon dioxide
CoE	center of excellence
CRO	Chief Risk Officer
CSBO	Chief Sustainability Business Officer
CSDDD	Corporate Sustainability Due Diligence Directive
CSO	Chief Sustainability Officer
CSR	corporate social responsibility
CSRD	Corporate Sustainability Reporting Directive
D&I	diversity and inclusion
DACH	Germany, Austria, Switzerland
DMA	double materiality assessment
EFRAG	European Financial Reporting Advisory Group
ESG	environmental, social and governance
ESRS	European Sustainability Reporting Standards
EU	European Union
EVP	employee value proposition
FTE	full-time employees
FY	financial year
gCO_2/km	measurement of carbon dioxide emissions per kilometer
GDPR	General Data Protection Regulation
GenAI	generative AI
GHG	greenhouse gas
GNTAP	Global New Technology Acquisition Process
GPU	graphics processing unit
GRI	Global Reporting Initiative
HR	human resources
HRDD	Human Rights Due Diligence
HSE	health, safety and environment
HSW	health, safety and wellbeing
IBIOL	Iberia, International Organizations, LATAM and Consulting in Benelux and France
ICT	information and communication technology
IFPSM	International Federation of Purchasing and Supply Management

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Abbreviations

ILO	International Labour Organization
IoT	Internet of Things
IP	intellectual property
IRAS	Inland Revenue Authority of Singapore
IRO	impacts, risks and opportunities
ISO	International Organization for Standardization
IT	information technology
KPI	key performance indicator
LATAM	Latin America
LGBTQ+	lesbian, gay, bisexual, transgender, queer/questioning, plus (others)
NGO	nongovernmental organization
NHS	National Health Service
OECD	Organisation for Economic Co-operation and Development
OT	operational technology
P&C	People and Culture
PPA	power purchase agreement
PUE	power-usage effectiveness
PV	photovoltaic
R&D	research and development
SAQ	self-assessment questionnaire
SDG	Sustainable Development Goal
SME	small and medium enterprise
SOC	security operations centers
STEM	science, technology, engineering and mathematics
tCO2e	tonnes of carbon dioxide equivalent
TPT	Transition Plan Taskforce
TWG	Thematic Working Group
UK	United Kingdom
UN	United Nations
UNGC	United Nations Global Compact
UNIDO	United Nations Industrial Development Organization
US	United States
WBCSD	World Business Council for Sustainable Development
WEF	World Economic Forum
WUE	water-use efficiency
WWF	World Wildlife Fund
YoY	year-on-year

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Annexures



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Annexure A

Non-disclosure data points

Annexure A.1
Purpose of this annexure

This annexure sets out the data points identified as material through the NTT DATA's CSRD double materiality assessment that are not disclosed within this CSRD-aligned voluntary report, which has been prepared on the basis of FY25 data (1 April 2025 – 31 March 2026).

NTT DATA has elected to publish this report on a voluntary, CSRD-aligned basis in advance of mandatory application of the Corporate Sustainability Reporting Directive (CSRD), which will apply to NTT DATA for reporting on FY27 data. While material topics and relevant data points have been identified in accordance with the European Sustainability Reporting Standards (ESRS) framework, certain data points are not disclosed in this report.

Annexure A.2
Basis for non-disclosure

NTT DATA has elected to publish this report on a voluntary, CSRD-aligned basis. The non disclosure of the data points listed in this annexure reflects a transitional implementation phase as NTT DATA prepares for mandatory application of the CSRD. Non disclosure is primarily due to one or more of the following factors:

- CSRD aligned data systems, methodologies and internal control frameworks are still under development or being standardized across the organization.
- Certain data points require enhanced data availability, methodological maturity or value chain information that is not yet fully available for FY25.
- Governance, documentation and validation processes required to meet ESRS requirements are in the process of being formalized to support future assurance.

The Group emphasizes that these data points are considered material and are not omitted due to immateriality. Non disclosure does not indicate an absence of policies, actions, targets or management approaches related to the underlying topics.

Annexure A.3
Commitment to future disclosure

NTT DATA is committed to disclosure of all material ESRS data points in line with CSRD requirements once NTT DATA is subject to mandatory reporting under the CSRD. The data points listed in this annexure are expected to be disclosed in future reporting periods as CSRD aligned systems, processes and controls are fully implemented, with the objective of complete compliance for reporting on FY27 data.

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Annexure A.4 Material non-disclosure data points

Annexure A.4.1 Planet Positive: Climate Change

Table 13: Non-disclosures: Climate Change

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points
ESRS E1-8	Internal carbon pricing	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points
ESRS E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points

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Annexure A.4.2 Planet Positive: Water Management

Table 14: Non-disclosures: Water Management

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS E3-2	Actions and resources related to water and marine resources	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS E3-3	Targets related to water and marine resources	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points
ESRS E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points

Annexure A.4.3 Planet Positive: Circularity

Table 15: Non-disclosures: Circularity

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS E5-1	Policies related to resource use and circular economy	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS E5-2	Actions and resources related to resource use and circular economy	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points
ESRS E5-3	Targets related to resource use and circular economy	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points
ESRS E5-4	Resource inflows	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points
ESRS E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Yes	Not disclosed – transitional	Annexure A: Non-disclosure data points

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Annexure A.4.4 Prosperity Positive: Sustainable Supply Chain

Table 16: Non-disclosures: Sustainable Supply Chain

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS E2-2	Processes for engaging with value chain workers about impacts	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS E2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS E2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS G1-2	G1-2 – Management of relationships with suppliers	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points

Annexure A.4.5 Prosperity Positive: Secure and sustainable-by-design services and solutions

Table 17: Non-disclosures: Secure and Sustainable-by-design Services and Solutions

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS S4-2	Processes for engaging with consumers and end-users about impacts	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points

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Annexure A.4.6 People Positive: People-centric Company

Table 18: Non-disclosures: People-centric Company

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS S1-1	Policies related to own workforce	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-2	Processes for engaging with own workforce and workers' representatives about impacts	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-7	Characteristics of non-employees in the undertaking's own workforce	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-8	Collective bargaining coverage and social dialogue	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-10	Adequate wages	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-11	Social protection	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-12	Persons with disabilities	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-13	Training and skills development metrics	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-15	Work-life balance metrics	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-16	Remuneration metrics (pay gap and total remuneration)	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points

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Annexure A.4.7 People Positive: Health and Safety

Table 19: Non-disclosures: Health and Safety

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS S1-1	Policies related to own workforce	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points
ESRS S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points

Annexure A.4.8 People Positive: Human Rights

Table 20: Non-disclosures: Human Rights

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS S1-17	Incidents, complaints and severe human rights impacts	Yes	Not disclosed — transitional	Annexure A: Non-disclosure data points

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Annexure A.4.9 Business Conduct: Anticorruption and bribery

Table 21: Non-disclosures: Anticorruption and bribery

ESRS Standard	Disclosure requirement/data point	Material	Disclosure status (FY25)	Location in report
ESRS G1-4	Incidents of corruption or bribery	Yes (at the regional level)	Not disclosed — transitional	Annexure A: Non-disclosure data points

Annexure A.5 Non-material ESRS topics
Non-material non-disclosure data points

NTT DATA, Inc. has conducted a double materiality assessment in line with ESRS requirements. Based on this assessment, certain ESRS topical standards or specific disclosure areas within standards were determined to be not material. In accordance with ESRS 1, these topics are therefore not disclosed in this report.

Table 22: Non-material ESRS topics

ESRS standard	Topic/area	Materiality assessment	Rationale for non materiality	Disclosure status (FY25)
ESRS E4	Biodiversity and ecosystems	Not material	The Group's activities as an IT and digital services provider do not result in material impacts on biodiversity and ecosystems, and no significant biodiversity-related risks or opportunities were identified through the double materiality assessment.	Not applicable

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Annexure B
Index tables

This annexure provides structured index tables to support transparency, traceability, and alignment with applicable sustainability reporting frameworks.

Table 23: Index of ESRS disclosures and location within report fulfills ESRS requirements, including ESRS 2 and Topical ESRS, by presenting a comprehensive index of disclosures and their location within this report.

Table 24: Index of Climate Transition Plan disclosures (TPT Framework) provides a dedicated cross reference of all disclosures related to the Group's Climate Transition Plan, aligned with the Transition Plan Taskforce (TPT) framework.

Together, these tables enhance usability for stakeholders, including auditors and regulators, by enabling efficient navigation and demonstrating the coherence of disclosures across ESRS and TPT requirements.

Annexure B.1 European Sustainability Reporting Standards (ESRS)

[ESRS 2] and [Topical ESRS]

Table 23: Index of ESRS disclosures and location within report

ESRS standard	Disclosure requirement	Full name of disclosure requirement Location in report
ESRS 2	BP 1	Basis for preparation of the sustainability statement → Basis for preparation [ESRS 2 BP-1, BP-2]
ESRS 2	BP 2	Disclosures in relation to specific circumstances → Basis for preparation [ESRS 2 BP-1, BP-2]
ESRS 2	SBM 1	Strategy, business model and value chain → Strategy, business model and value chain [ESRS 2 SBM-1, SBM-2]
ESRS 2	SBM 2	Interests and views of stakeholders → Strategy, business model and value chain [ESRS 2 SBM-1, SBM-2]

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ESRS standard	Disclosure requirement	Full name of disclosure requirement Location in report
ESRS 2	SBM 3	Material impacts, risks and opportunities and their interaction with strategy and business model → Impacts, risks and opportunities (IROs) [ESRS 2 SBM-3]
ESRS 2	IRO 1	Description of the processes to identify and assess material impacts, risks and opportunities → Double materiality assessment (DMA) [ESRS 2 IRO-1]
ESRS 2	GOV 1	Governance of sustainability matters → Governance [ESRS 2 GOV-1, GOV-5]
ESRS 2	GOV 2	Information provided to and sustainability matters addressed by administrative, management and supervisory bodies → Risk management of and internal controls for sustainability reporting
ESRS 2	GOV 3	Integration of sustainability-related performance in incentive schemes → Incentives and remuneration
ESRS 2	GOV 4	Statement on due diligence → Basis for preparation [ESRS 2 BP-1, BP-2]
ESRS 2	GOV 5	Risk management and internal controls over sustainability reporting → Governance [ESRS 2 GOV-1, GOV-5]

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ESRS standard	Disclosure requirement	Full name of disclosure requirement Location in report
ESRS 2	MDR-P	Policies adopted to manage material sustainability matters → Governance [ESRS 2 GOV-1, GOV-5]
ESRS 2	MDR-A	Actions and resources in relation to material sustainability matters → Embedded throughout document within relevant material topics disclosure
ESRS 2	MDR-T	Targets related to material sustainability matters → Embedded throughout document within relevant material topics disclosure
ESRS 2	MDR-M	Metrics in relation to material sustainability matters → Embedded throughout document within relevant material topics disclosure
ESRS E1 Climate change	E1-1	Transition plan for climate change mitigation → Climate Transition Plan [E1-1]
ESRS E1 Climate change	E1-2	Policies related to climate change mitigation and adaptation → 31
ESRS E1 Climate change	E1-3	Actions and resources related to climate change policies → 33
ESRS E1 Climate change	E1-4	Targets related to climate change mitigation and adaptation → 32

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ESRS standard	Disclosure requirement	Full name of disclosure requirement Location in report
ESRS E1 Climate change	E1-5	Energy consumption and mix → 27
ESRS E1 Climate change	E1-6	Gross greenhouse gas emissions → 29
ESRS E1 Climate change	E1-7	Greenhouse gas removals and greenhouse gas mitigation projects financed through carbon credits → 102
ESRS E3 Water and marine resources	E3-1	Policies related to water and marine resources → 102
ESRS E3 Water and marine resources	E3-2	Actions and resources related to water and marine resources → 102
ESRS E3 Water and marine resources	E3-3	Targets related to water and marine resources → 103
ESRS E3 Water and marine resources	E3-4	Water consumption → 104
ESRS E5 Resource use and circular economy	E5-1	Policies related to resource use and circular economy → 109
ESRS E5 Resource use and circular economy	E5-2	Actions and resources related to resource use and circular economy → 56

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ESRS standard	Disclosure requirement	Full name of disclosure requirement Location in report
ESRS E5 Resource use and circular economy	E5-3	Resource inflows, including resource use and waste → 57
ESRS E5 Resource use and circular economy	E5-5	Resource inflows, including resource use and waste → 57
ESRS S1 Own workforce	S1-1	Policies related to own workforce → 102
ESRS S1 Own workforce	S1-2	Processes for engaging with own workforce and workers' representatives → 102
ESRS S1 Own workforce	S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns → 102
ESRS S1 Own workforce	S1-4	Actions related to own workforce → 102
ESRS S1 Own workforce	S1-5	Targets related to own workforce → 103
ESRS S1 Own workforce	S1-6	Characteristics of the undertaking's employees → 104
ESRS S1 Own workforce	S1-9	Diversity metrics → 109

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ESRS standard	Disclosure requirement	Full name of disclosure requirement Location in report
ESRS S1 Own workforce	S1-14	Health and safety metrics → 115
ESRS S2 Workers in the value chain	S2-1	Policies related to value chain workers → 83
ESRS S2 Workers in the value chain	S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns → 83
ESRS S4 Consumers and end users	S4-1	Policies related to consumers and end users → 83
ESRS S4 Consumers and end users	S4-2	Processes for engaging with consumers and end users about impacts → 83
ESRS S4 Consumers and end users	S4-4	Actions related to consumers and end users → 83
ESRS G1 Business conduct	G1-1	Business conduct policies and corporate culture → Code of Business Ethics G1.GOV1], [MDR-P] and [IRO-1]
ESRS G1 Business conduct	G1-2	Management of relationships with suppliers → Supplier Code of Conduct

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ESRS standard	Disclosure requirement	Full name of disclosure requirement Location in report
ESRS G1 Business conduct	G1-3	Prevention and detection of corruption and bribery → Prevention and detection of corruption and bribery [G1-3]
ESRS G1 Business conduct	G1-6	Payment practices → 87

This index includes disclosures addressed within this voluntary CSRD aligned report.

Material data points not disclosed are presented separately in the in Annexure A: Non-disclosure data points.

Topics assessed as not material are outlined in Table 18: Non-material ESRS topics.

Annexure B.2 Climate Transition Plan

This table provides a structured index of disclosures related to our Climate Transition Plan, aligned with the Transition Plan Taskforce (TPT) framework, and indicates where relevant information is presented within this report.

Table 24: Index of Climate Transition Plan disclosures (TPT Framework)

TPT pillar	TPT reference	TPT number	Disclosure element	Full name of disclosure Location in report
Ambition	TPT A1	1.1	Strategic ambition	Strategic ambition and climate objective → Strategic ambition and climate objective (TPT A1)
Ambition	TPT A2	1.2	Impacts and dependencies	Material climate impacts, dependencies and sensitivities → Material climate impacts and dependencies (TPT A2)

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TPT pillar	TPT reference	TPT number	Disclosure element	Full name of disclosure Location in report
Ambition	TPT A3	1.3	Strategic trade-offs	Strategic trade-offs and mitigation choices → Strategic trade offs and mitigation choices (TPT A3)
Ambition	TPT A4	1.4	Stakeholder alignment	Alignment with stakeholders and external requirements → Alignment with stakeholders and external requirements (TPT A4)
Business model and value chain	TPT B1	2.1	Business model	Business model and emissions concentration → Business model and value chain (business model implications)
Business model and value chain	TPT B2	2.2	Transition levers	Transition levers within the business model → Transition levers within the business model (TPT B2)
Business model and value chain	TPT B3	2.3	Risks and sensitivities	Transition risks and sensitivities → Transition risks and sensitivities (TPT B3)
Business model and value chain	TPT B4	2.4	Resilience	Long-term resilience and strategic positioning → Long term resilience and strategic positioning (TPT B4)
Implementation strategy	TPT C1	3.1	Business planning	Integration of climate transition into business planning and operations → Business operations (business planning and operations)
Implementation strategy	TPT C2	3.2	Products and services	Alignment of products and services with transition plan objectives → Products and services
Implementation strategy	TPT C3	3.3	Policies and conditions	Policies supporting delivery of the Climate Transition Plan → Policies and conditions

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TPT pillar	TPT reference	TPT number	Disclosure element	Full name of disclosure Location in report
Implementation strategy	TPT C4	3.4	Financial planning	Financial planning and capital allocation for transition → Financial planning
Engagement strategy	TPT D1	4.1	Value chain engagement	Engagement with suppliers and the value chain → Engagement with value chain
Engagement strategy	TPT D2	4.2	Industry engagement	Engagement with industry initiatives and partnerships → Engagement with industry
Engagement strategy	TPT D3	4.3	Public sector engagement	Engagement with governments, public sector and civil society → Engagement with government, public sector and civil society
Metrics, targets and governance	TPT E1	5.1	Metrics and targets	Climate-related metrics and targets → Metrics and targets
Metrics, targets and governance	TPT E2	5.2	Financial metrics	Financial metrics and targets related to transition → Financial metrics and targets
Metrics, targets and governance	TPT E3	5.3	GHG metrics	Greenhouse gas metrics and targets → GHG metrics and targets
Metrics, targets and governance	TPT E4	5.4	Carbon credits	Use of carbon credits and removals → Carbon credits
Metrics, targets and governance	TPT E5	5.5	Governance	Governance, oversight and accountability for the transition plan → Governance

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TPT pillar	TPT reference	TPT number	Disclosure element	Full name of disclosure Location in report
Metrics, targets and governance	TPT E6	5.6	Incentives	Incentives and remuneration linked to climate-related targets → Incentives and remuneration

Annexure B.2.1 Non-financial Reporting Directive (NFRD)

Table 25: Index of Non-financial Reporting Directive disclosures

ESRS	DR	Name	Regulation	NFRD requirement Location in report
ESRS 2	BP-1	Basis for preparation	NFRD 11/2018	General disclosure framework → Basis for preparation [ESRS 2 BP-1, BP-2]
ESRS 2	SBM-1	Business model	NFRD 11/2018	Business model and strategy → Basis for preparation [ESRS 2 BP-1, BP-2]
ESRS 2	GOV-1	Governance	NFRD 11/2018	Policies and governance → Governance [ESRS 2 GOV-1, GOV-5]
ESRS 2	IRO-1	Double materiality assessment	NFRD 11/2018	Risks and impacts → Double materiality assessment (DMA) [ESRS 2 IRO-1]

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ESRS	DR	Name	Regulation	NFRD requirement Location in report
ESRS 2	SBM-3	Impacts, risks and opportunities	NFRD 11/2018	Risks and impacts → Impacts, risks and opportunities (IROs) [ESRS 2 SBM-3]
E1	E1-1 E1-4	Climate strategy and targets	NFRD 11/2018	Climate change → 31
E1	E1-5 E1-6	GHG emissions	NFRD 11/2018	Climate change (emissions) → 35
E3	E3-4	Water management	NFRD 11/2018	Resource use (water) → 61
E5	E5-5	Waste and circularity	NFRD 11/2018	Circular economy and waste → 57
S1	S1-6 S1-9	Workforce characteristics	NFRD 11/2018	Workforce → 104
S1	S1-14 S1-17	Health, safety and incidents	NFRD 11/2018	Workforce (health and safety) → 115
S2	S2-1 S2-3	Supply chain workers	NFRD 11/2018	Suppliers and subcontractors → 83

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ESRS	DR	Name	Regulation	NFRD requirement Location in report
S4	SBM-3	Consumers and end users	NFRD 11/2018	Consumers → Business conduct
G1	E1-1 E1-4	Anticorruption and business conduct	NFRD 11/2018	Anticorruption and bribery → Prevention and detection of corruption and bribery [G1-3]
ESRS 2	E1-5 E1-6	Index of disclosures	NFRD 11/2018	Cross-reference → 162

Annexure C

List of consolidated legal entities

Annexure C.1 Purpose of this annexure

This annexure sets out the legal entities included in the consolidation scope of this sustainability statement, in accordance with the basis for preparation and reporting boundary defined under ESRS 2 BP 1.

The entities listed comprise those subsidiaries over which NTT DATA, Inc. exercises control and whose activities are included in this report on a consolidated basis. This disclosure is provided to ensure transparency of the reporting scope and to support the application of applicable exemptions under the Corporate Sustainability Reporting Directive (CSRD) for entities covered by this consolidated sustainability statement.

Annexure C.2 Legal entities covered by this report

A full list of the legal entities covered in this NTT DATA, Inc. FY25 CSRD Aligned Voluntary Report can be found on our website.

→ Global List of Operating and Holding Companies

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Annexure D

Annexure D: NTT DATA Europe & Latam Complementary Non-financial Report

Basis for preparation

This complementary non-financial report has been prepared to complement the information included in the NTT DATA, Inc. FY25 CSRD Aligned Voluntary Report and to comply with the requirements set out in the Spanish Law 11/2018 of 28 December 2018, on non-financial reporting and diversity. The information and data provided here is presented aligned to the Global Reporting Initiative Framework for fiscal year 2025 (FY25) of NTT DATA Europe & Latam, a legal entity part of NTT DATA, Inc., hereinafter also referred to as “NTT DATA EMEAL”, covering the period 1 April 2025 to 31 March 2026.

General description

Scope and limits of the report

This report has been prepared as a consolidated report for the parent company NTT DATA Europe & Latam, S.L.U and its subsidiaries. At the end of FY25, 52 legal entities and 23 branches are part of the Company, present in 30 countries.

To present the data, it will be generally disaggregated by country and region. The DACH region includes Austria, Germany and Switzerland. For this report, the data for Switzerland is broken down into two different business units, Switzerland (Benelux) and Switzerland (DACH).

Complete information will not be found for:

- Lithuania or Costa Rica, as these are recently created entities without professionals
- Vietnam or Ireland, as they do not share the same structure and reporting processes as the rest of the entities,

For these countries, only partial information (where such information exists) will be included, as indicated in the relevant section of the report. Possible differences in the scope of information provided are set out in each of the corresponding sections.

The companies comprising the NTT DATA Europe & Latam Group for FY25 are listed below. It is important to note that there have been changes in the scope of consolidation during the fiscal year compared to FY24, resulting in differences, compared to the previous fiscal year.

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Table 26: Companies comprising the NTT DATA Europe & LATAM Group for FY25

Europe	
Belgium	NTT DATA Belgique S.R.L. NTT DATA Spain, S.L.U., Succursale en Belgique.
Croatia	NTT DATA Croatia d.o.o.
DACH- Germany	NTT DATA Deutschland S.E. Ellaion GmbH
DACH- Austria	NTT DATA Deutschland, Branch in Austria.
DACH- Switzerland	NTT DATA Deutschland, Branch in Switzerland (Bern) NTT DATA Deutschland Branch in Switzerland (Zurich)
France	NTT DATA Spain, S.L., Succursale Française
Greece	NTT DATA Belgique, S.R.L. Greek Branch
Ireland	NTT DATA UK Limited, Branch in Ireland
Italy	NTT DATA Italia S.p.A. NTT DATA Italia Gov& Tech S.R.L. NTT Italia S.p.A.
Lithuania	LITIT UAB

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Table 26: Companies comprising the NTT DATA Europe & LATAM Group for FY25

Europe	
Luxembourg	NTT DATA Spain, S.L.U., Succursale Luxembourgeoise
Netherlands	NTT DATA Spain, S.L.U., Branch in the Netherlands
Portugal	NTT DATA Portugal Centers Unipessoal, Ltda. NTT DATA Portugal S.A. NTT DATA Portugal Outsourcing de Processos Ltda.
Romania	NTT DATA Romania S.A.
Spain	NTT DATA Europe & Latam S.L.U. NTT DATA Spain S.L.U. NTT DATA Europe & Latam Finance S.L.U. NTT DATA Spain Soluciones Tecnológicas S.L.U. NTT DATA Spain Infrastructures Operations S.L.U. NTT DATA Spain Infrastructures Engineering S.L.U. Fit Inversión en Talento S.A.U. NTT DATA Spain BPO S.L.U. ARILION S.L.U. NTT DATA Europe & Latam Centers S.L.U. NTT DATA Spain Centers S.L.U. NTT DATA Europe & Latam Green Engineering S.L.U. NTT DATA Spain Sistemas de Seguridad S.L.U.
Switzerland	NTT DATA Spain, S.L.U., Branch in the Switzerland

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Europe	
United Kingdom	NTT DATA EMEA Limited NTT DATA UK Ltd. KeanePensionTrustees Ltd.
Serbia	NTT DATA Romania, S.A. OGRANAK SREMSKA KAMENICA (Branch in Serbia)
America	
Argentina	NTT DATA Argentina S.A.
Brazil	NTT DATA Brasil Consultoria de Negócios e Tecnologia da Informação Ltda. NTT DATA Brasil Operações Ltda. NTT DATA Brasil Operações Ltda. (Sucursal Rio de Janeiro) NTT DATA Brasil Operações Ltda (Sucursal Uberlândia) NTT DATA Brasil Consultoria de Negócios e Tecnologia da Informação Ltda. (Sucursal Uberlândia) NTT DATA Brasil Consultoria de Negócios e Tecnologia da Informação Ltda. (Sucursal Rio de Janeiro) NTT DATA Brasil Consultoria de Negócios e Tecnologia da Informação Ltda. (Sucursal Recife) NTT DATA Brasil Consultoria de Negócios e Tecnologia da Informação Ltda. (Sucursal CENESP) NTT DATA Brasil Consultoria de Negócios e Tecnologia da Informação Ltda. (Sucursal Florianópolis) NTT DATA Brasil Consultoria de Negócios e Tecnologia da Informação Ltda. (Sucursal Barueri)
Chile	NTT DATA Chile S.A. NTT DATA Chile BPO Servicios Profesionales, Técnicos y Tecnológicos Ltda. NTT DATA Chile Centers Ltda.

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Colombia	NTT DATA Colombia S.A.S. NTT DATA Spain, S.L. Sucursal en Colombia
Ecuador	NTT DATA Ecuador S.A. NTT DATA Perú, S.A.C., Sucursal en Ecuador
Mexico	NTT DATA México S. de R.L. de C.V. NTT DATA México BPO S. de R.L. de C.V
Peru	NTT DATA Perú S.A.C. NTT DATA Perú BPO S.A.C. NTT DATA Spain BPO, S.L.U. Sucursal del Perú
Uruguay	NTT DATA Uruguay S.A.
United States	TT DATA EUROPE and LATAM, Branch in USA, Inc.
Africa	
Morocco	NTT DATA Morocco Centers S.A.R.L.
Asia	
Vietnam	NTT DATA VDS Company Limited

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Planet Positive

Climate change

Decarbonization measures

NTT DATA Europe & Latam has continued to make progress on its decarbonization strategy, aligning its actions with international benchmarks and aiming to achieve a sustained reduction in its greenhouse gas emissions.

In this context, initiatives have been launched to reduce Scope 1 and Scope 2 emissions, as well as certain relevant categories of Scope 3 emissions, in line with the Group's commitment to progressively move toward long-term climate neutrality.

These actions are structured around key levers such as the transition to renewable energy, the electrification of operations, the improvement of energy efficiency in real estate assets, and the promotion of sustainable mobility models, generating measurable progress in reducing the carbon footprint across different regions.

Scope 1 and 2

Decarbonization actions in our facilities

In the United Kingdom, the transition to 100% renewable electricity in all facilities has been completed, resulting in a significant reduction in Scope 2 emissions, from 133tCO_2e to 7tCO_2e by 2024. In addition, energy-efficient measures have been implemented, such as lighting systems with motion sensors, and flexible office-use models have been introduced in certain areas to optimize energy consumption.

In Italy, 100% of the electricity consumed at certain assets comes from renewable sources through guarantees of origin, complemented by the development of self-consumption solutions such as photovoltaic installations and solar thermal systems.

In Spain, progress is being made in the use of 100% renewable electricity, along with energy-efficiency measures in buildings (optimization of heating, ventilation and air-conditioning (HVAC) systems) and the reduction of refrigerant gas emissions.

In Portugal, electricity consumption is covered by certified green energy, and efficiency measures such as smart energy-management systems in buildings have been implemented.

In Brazil, Chile, Portugal and Greece, other energy-efficiency measures have been implemented in facilities, such as lighting automation, the deployment of LED lighting, the incorporation of smart energy-management systems in buildings, and the promotion of responsible practices for air-conditioning and lighting use, contributing to reduced energy consumption.

Decarbonization actions on sustainable mobility

NTT DATA Europe & Latam is driving the decarbonization of corporate mobility through a comprehensive approach that combines reducing travel demand, the gradual electrification of the fleet and improving vehicle efficiency, complemented by the development of infrastructure and incentives to promote low-emission mobility solutions.

In this context, additional measures have been implemented in Chile and Portugal to reduce mobility-related emissions, including the promotion of efficient corporate transport solutions, shared transportation services for events, remote and hybrid working schemes aimed at reducing commuting needs, and the prioritization of office locations with access to public transportation.

In the DACH region, a key area of reduction has been the transformation of the corporate fleet. Fully electric vehicles currently account for 21% of the fleet at NTT DATA Deutschland S.E. and 28% at NTT Germany AG and Co. KG, compared to 14% and 18% in FY24 respectively, with the goal of limiting new lease contracts to 100% electric vehicles starting in FY26. This initiative has been driven by a structured incentive system, including e-leasing programs, and the progressive tightening of emissions thresholds, reduced from 150gCO_2/km in FY24 to 130gCO_2/km in FY25.

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In Spain, progress was also made in the transition toward lower-emission corporate fleets. During FY25, NTT DATA Spain incorporated 2 electric vehicles and 3 plug-in hybrid vehicles into its own corporate fleet, generating an estimated reduction of 11.53 tCO_2e. Meanwhile, in Romania, progress has been made in reducing fossil fuel consumption by optimizing fleet usage, resulting in a decrease of 7,587.70 liters of diesel and 17,177.10 liters of gasoline compared to FY24, which translates into a reduction of 60 tCO_2e. In parallel, charging infrastructure for electric vehicles has continued to be developed at corporate headquarters in DACH and the UK, supporting the gradual shift toward electrified mobility across the region.

Scope 3

Purchased goods

NTT DATA, Inc. globally is working to reduce emissions associated with purchased goods by adopting circular economy principles and optimizing resource use, thereby extending the useful life of assets and minimizing waste.

Circular economy practices in IT asset management in specific regions, including the refurbishment, reuse, resale, donation and recycling of equipment with the aim of extending its useful life and reducing emissions associated with the production of new hardware, have been implemented.

Sustainable travel policies

NTT DATA promotes the adoption of sustainable mobility models aimed at reducing emissions associated with employee commuting, combining a reduction in travel demand with the promotion of travel alternatives with a lower carbon footprint.

DACH gives incentives to its employees for using public transportation and trains, complemented by the implementation of flexible work models. In the UK, the Work Where It Works program aims to reduce the structural demand for commuting.

Spain has set a target to reduce business travel emissions by 3% in absolute terms and per employee. To support this objective, the NTT DATA IBIOL Travel Policy was updated in April 2025 to include sustainability criteria, such as recommending train travel for journeys under four hours door-to-door when a rail alternative is available, and assessing the use of fares that include emissions compensation where this does not exceed the costs established in the travel policy and its annexures. The updated policy also recommends prioritizing hotels with sustainability certifications, such as ISO 14001, LEED or BREEAM, whenever possible. In parallel, agreements are being developed with key airline suppliers to incorporate the use of sustainable aviation fuel for employee flights. Through these measures, Spain estimates a 3% reduction in Scope 3 emissions related to business travel during FY25, reinforcing our broader approach to reducing mobility-related emissions across the region.

Supply chain

ESG criteria have been integrated into supply chain management, including their assessment through KPIs, risk analysis and the development of improvement plans with suppliers.

Circular economy

Measures to reduce waste generation

In FY25, NTT DATA Europe & Latam continued to strengthen its circular economy approach by promoting initiatives focused on reducing waste generation, improving waste segregation, extending the useful life of assets and ensuring the responsible management of electronic waste.

These actions were built on the work carried out in FY24, when we consolidated circularity as one of the priority areas of its environmental strategy and reported progress in waste monitoring, reuse and recycling practices across its offices. In FY25, the initiatives implemented across countries show a common effort to embed circular economy principles into day-to-day operations, particularly through office waste management, the reduction of single-use materials, the reuse of furniture and IT equipment, and the proper treatment of waste electrical and electronic equipment.

Several countries reinforced office waste management systems through improved segregation and recycling processes.

Belgium, Italy, France, the Netherlands, Switzerland, Colombia, Ecuador, Greece, Portugal, Croatia and Romania implemented or maintained initiatives aimed at separating waste streams such as paper, plastics, residual waste, organic waste, glass, batteries, printer toners and recyclable materials. In Romania, we also expanded office-level weighing of waste to improve the accuracy of waste data and enable more targeted reduction actions. We also continued with the RetuRO system, reducing waste by ensuring traceable reuse and recycling of collected beverage containers. These measures contribute to increasing employee awareness, improving the traceability of waste and supporting more effective recycling practices in the workplace.

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The reduction of single-use materials was also a recurring area of action.

In DACH, reusable lunch boxes were introduced across several offices, with an estimated annual avoidance of approximately 74kg of plastic waste, and a wider recycling campaign included the removal of plastic liners from under-desk bins, with an estimated reduction of around 70,000 plastic bags per year. Italy continued its plastic-free approach through the use of water dispensers and reusable bottles, reducing the consumption of single-use plastic bottles by around 38% from 2023, and avoiding more than 200kg of plastic over the last two years. Romania also eliminated single-use bottled water in the Cluj office, avoiding approximately 18,264 plastic bottles, while Croatia and the UK promoted the use of reusable dishes, cutlery and containers to reduce disposable paper and plastic alternatives. In Portugal, awareness campaigns over Black Friday and Christmas encouraged more responsible consumption and waste reduction, while the coffee-capsule recycling program with Nespresso continued, with 1,290kg of capsules recycled during the year and 1,000 tons of coffee grounds recovered for use in food production. Mexico also partook in this initiative.

NTT DATA also continued to prioritize the reuse and extension of the lifecycle of equipment, furniture and materials.

In DACH, 246 functional monitors from the Munich headquarters, representing approximately 900kg of IT equipment, were donated for reuse in hospitals in Ukraine instead of being sent to conventional recycling streams. In Spain, 50 IT devices were donated for reuse, including 45 laptops and 5 surface devices, benefiting different social, educational and nonprofit organizations such as Asociación VJ Aljarasol in Sevilla, CTR Mussols in Barcelona, ASOTRAME in A Coruña, Asociación Columbares in Murcia and Colegio Vamar in Valencia. In Chile, 210 notebooks were refurbished and sold internally to employees, avoiding an estimated 210kg of electronic waste by extending the useful life of the devices. Romania also maintained a sustainable inventory management initiative through which furniture and equipment are reused, resold or donated. In FY25, approximately 137 furniture items and 175 equipment items, including laptops and monitors, were sold. Italy donated 84 laptops to nonprofit organizations for humanitarian, educational and social purposes, and Brazil transformed material used during a Children's Day activity into 20 reusable bags through its PCD e você workshop (PCD: persons with disabilities/Pessoa com Deficiência), linking waste reduction with social inclusion.

The responsible management of electronic waste remained another key line of action, continuing our FY24 approach to extending the useful life of IT assets and ensuring appropriate end-of-life treatment.

In the US, NTT DATA implemented formal processes for data destruction and e-waste recycling, including the secure destruction of 27 storage devices and the recycling of obsolete laptops with a total weight of 1,275lbs. Colombia delivered 230kg of electrical waste and electronic equipment to an authorized environmental manager, while Mexico maintained processes for the collection, dismantling and recycling of electronic waste through specialized suppliers.

Overall, the initiatives implemented during FY25 reflect a continued effort to move from isolated actions toward more systematic circular economy practices across the region. Although each country adapts its initiatives to local operational needs, the recurring measures show a common focus on waste prevention, better segregation, the reduction of single-use materials, the reuse of assets and responsible end-of-life management, reinforcing NTT DATA Europe & Latam's commitment to reducing the environmental impact of its operations and promoting a more circular use of resources.

Food waste

This standard is not disclosed in this report as, according to the last double materiality assessment results, it is not material to the Company.

Biodiversity

This standard is not disclosed in this report as, according to the last double materiality assessment results, it is not material to the Company.

Pollution

This standard is not disclosed in this report as, according to the last double materiality assessment results, it is not material to the Company.

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Prosperity Positive

Anticorruption

NTT DATA Europe & Latam addresses money laundering as part of its broader Compliance and Risk Management Framework for the prevention of criminal, regulatory and ethical risks. This framework is based on a culture of integrity, transparency and compliance with applicable laws, supported by senior management and the Board of Directors through a zero-tolerance approach to regulatory breaches and criminal risks.

In FY25, the Company continued to apply a structured risk management process to identify, assess and monitor material risks that could affect its operations and business objectives. Money laundering is included among the criminal risks considered within this preventive approach, together with corruption, bribery, fraud, tax evasion, anticompetitive practices and risks related to human rights.

The prevention model is supported by internal policies, controls, third-party due diligence measures, traceability of records and reporting channels. In particular, the corporate SpeakUp channel allows professionals and third parties to report potential regulatory or ethical breaches, including anonymously where applicable, with confidentiality and protection against retaliation.

Based on the information available, no specific money-laundering incidents, sanctions, public investigations or convictions were reported during FY25 within the NTT DATA Europe & Latam perimeter.

Suppliers

The main objective of the Procurement function is to ensure quality in purchasing and contracting processes. As in previous years, this commitment is supported by a set of policies and procedures that remain in place and structure the management of the function:

- The **Global Supplier Risk Management Policy** describes a comprehensive process for managing risks associated with the supply chain, enabling us to identify, assess and treat risks for subsequent monitoring. This policy sets out the rules, responsibilities and basic conditions for supplier risk management at corporate level and is aligned with the guidelines provided by NTT DATA, as well as the company-wide sustainability strategy.
- The **Global Purchasing Policy**, which includes NTT DATA Europe & Latam's purchasing processes for goods and services, as well as the regulations, responsibilities and basic conditions for corporate procurement.
- The **Supplier Code of Conduct,** which promotes sustainability-related initiatives along the value chain through responsible business activities. Suppliers are encouraged to comply with applicable legislation, respect human rights and engage in fair trade.

Sustainable purchasing

NTT DATA believes that every purchasing decision is an opportunity to move toward a more sustainable future and to contribute to a world where technology and responsibility coexist in harmony. As in previous years, we remain committed to integrating sustainability principles across all stages of the procurement process.

Approved suppliers with sustainability criteria

Since the implementation of the supplier qualification process, sustainability has been integrated as a key component of the evaluation, enabling the assessment of both large companies and small and medium enterprises (SMEs) based on minimum criteria and their level of development in this area.

In FY25, this approach continued to be strengthened, with an increase in the percentage of suppliers qualified under sustainability criteria:

Approved suppliers with sustainable criteria*		
FY25	FY24	FY23
50.2%	34.2%	31.9%

*The information provided is limited in scope, covering only approved suppliers in Argentina, Brazil, Chile, Colombia, Mexico, Spain, the United States, Morocco and Peru.

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We are also strengthening sustainability capabilities within the procurement function, promoting greater integration of ESG criteria into supplier management, as well as developing tools, training and standards that enable us to move toward a more responsible procurement model.

ESG risk management

Since April 2024, SAP Ariba Supplier Risk has been in place to assess supplier risk, including a dedicated ESG risk catalog, and continues to be used in FY25.

Decarbonization

Efforts continue to adapt procurement processes to incorporate ecodesign and circularity criteria in the selection of products and services, contributing to the reduction of Scope 3 emissions.

Training

Participation in the United Nations Global Compact Spain Sustainability Training Program for SMEs continued in FY25, with 67 suppliers from 10 NTT DATA countries registered and members of the Global Purchasing and Spain teams taking the training.

Certifications

The ISO 20400 standard on sustainable procurement, initially implemented and certified in Spain in FY24 through the Spanish Association of Purchasing and Procurement Professionals (AERCE) and the International Federation of Purchasing and Supply Management (IFPSM), has been significantly expanded in FY25. The certification is now also in place in Argentina, Brazil, Chile, Ecuador, Mexico, Uruguay and the United States, reinforcing our global commitment to embedding environmental, social and ethical criteria across its supply chain. This broader geographical coverage marks a key milestone in the consolidation of a consistent and international sustainable procurement framework.

Clients

Management and resolution of complaints and claims

Client complaints and claims are handled with the highest priority, as they serve as a key indicator of service quality. As in previous years, specific mechanisms are in place to manage them, aimed at providing an effective response and maintaining high levels of satisfaction.

These mechanisms include direct interaction with the client, monitoring committees and escalation processes involving account managers and business units. If unresolved, claims are classified as pre-litigation or litigation and referred to the legal department.

In line with this approach, quality departments conduct periodic follow-ups in conjunction with the legal department to analyze these situations and identify opportunities for improvement, driving action plans aimed at strengthening project quality and customer satisfaction. In addition, social media communications are continuously monitored, in coordination with the brand and communications department, for integration into this process.

In FY25, 28 complaints were received, of which 13 were closed and 15 were open and ongoing at the end of the reporting period. These issues are handled through the mechanisms described above, ensuring ongoing communication with customers as well as proper follow-up and resolution. This structured approach enables effective case management and resolution, contributing to the continuous improvement of service quality and customer satisfaction.

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Tax-related information

Profits obtained by country

Table 27: Profit by country for FY23, FY24 and FY25

Country	Pretax profit FY25 (€)	Pretax profit FY24 (€)	Pretax profit FY23 (€)
Europe			
Belgium	10,322,395	1,342,615	3,295,514
Croatia	187,849	36,668	200,671
DACH *	-30,951,159	-19,421,938	16,283,113
Spain	50,691,450	62,508,574	-20,159,016
France	-2,386,125	-1,402,439	-936,725
Greece	-985,403	-255,183	431,932
Italy	5,753,891	24,335,830	24,023,791
Lithuania	817,008	139,908	0
Luxembourg	-888,275	-441,178	-1,051,883
Netherlands	-2,469,267	-307,467	3,815,361
Portugal	7,597,355	6,966,174	6,039,542
United Kingdom**	159,224	-2,020,575	4,779,699
Romania	-1,314,491	-6,920,763	1,506,270
Serbia	187,487	189,421	209,182
Switzerland	229,099	2,105,894	2,819,785

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America			
Argentina	-1,356,296	-524,694	-9,817,247
Brazil	22,064,852	15,540,772	29,427,650
Chile	5,151,484	396,106	1,787,944
Colombia	3,028,826	3,332,430	1,388,514
Ecuador	709,183	1,964,320	1,118,407
United States	-775,332	-2,469,769	630,233
Mexico	1,543,757	5,769,382	8,624,629
Peru	9,913,694	9,478,808	4,044,621
Uruguay	-126,128	-196,950	-93,739
Africa			
Morocco	633,737	713,804	590,237
Asia			
Vietnam	891,181	1,005,360	1,156,379
TOTAL	**78,629,996**	**101,865,110**	**80,081,965**

*DACH includes data from Germany, Austria and Switzerland.

** Data for Ireland is included in the United Kingdom.

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Tax paid on profits

Table 28: Income tax for FY23, FY24 and FY25

Country	Income tax paid FY25 (€)	Income tax paid FY24 (€)	Income tax paid FY23 (€)
Europe			
Belgium	3,351,935	6,011,743	2,739,105
Croatia	28,093	27,927	10,277
DACH*	3,538,925	3,140,852	5,349,418
Spain	18,756,468	10,118,245	47,926
Greece	202,010	339,298	0
Italy	184,937	549,188	12,476,969
Luxembourg	0	194,733	194,760
Netherlands	1,258,351	1,615,244	1,386,254
Portugal	2,499,404	3,035,720	242,984
United Kingdom**	324,933	1,212,792	642,693
Romania	1,073,046	811,800	955,755
Switzerland	348,575	0	256,284

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America			
Argentina	243,958	0	0
Brazil	252,139	129,979	3,772,320
Chile	583,251	646,007	350,099
Colombia	1,234,291	1,067,313	981,146
Ecuador	862,202	333,882	0
United States	0	82,014	0
Mexico	494,732	3,102,864	2,709,510
Peru	5,043,361	4,481,211	4,447,622
Uruguay	-126,128	-196,950	-93,739
Africa			
Morocco	186,263	0	100,336
Asia			
Vietnam	366,799	189,896	8,608,954
TOTAL	**40,833,682**	**37,090,708**	**45,272,412**

* DACH includes data from Germany, Austria and Switzerland.
** Data for Ireland is included in the United Kingdom.
*** Countries with 0 value were not included: France, Lithuania, Serbia and Uruguay.

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Public subsidies received

Table 29: Public subsidies received for FY23, FY24 and FY25

Country	FY25 (€)	FY24 (€)	FY23 (€)
Europe			
Belgium	12,766	25,026	95,179
Spain	2,862,460	2,860,193	2,260,208
Italy	4,070,603	2,394,426	1,069,727
Portugal	415,075	136,000	0
Romania	181,490	2,100,429	3,646,500
America			
Colombia	29,326	143,360	61,113
Africa			
Morocco	597,301	374,990	309,191
TOTAL	**8,169,025**	**8,034,424**	**7,441,918**

* Countries that did not receive public subsidies are not included.

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People Positive

Employment

Gender, age, country, and job classification

The following tables show the total number of employees by gender, age, country, and job category for fiscal years FY23, FY24, and FY25.

FY25

Table 30: Breakdown of employees by gender and country, FY25

	Women		Men		Other	
	Number	%	Number	%	N	Total
Europe						
Belgium	158	54%	132	46%	0	290
Croatia	11	48%	12	52%	0	23
DACH	642	31%	1,436	69%	0	2,078
Germany	603	31%	1,326	69%	0	1,929
Austria	31	29%	77	71%	0	108
Switzerland	8	20%	33	80%	0	41
Spain	6,911	33%	13,940	67%	0	20,851
France	15	26%	43	74%	0	58
Greece	36	40%	54	60%	0	90
Ireland	0	0%	0	0%	0	0

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Italy	1,756	30%	4,107	70%	0	5,863
Luxembourg	29	27%	78	73%	0	107
Netherlands	22	39%	34	61%	0	56
Portugal	706	38%	1,134	62%	0	1,840
United King-dom	420	28%	1,103	72%	0	1,523
Romania	557	47%	630	53%	0	1,187
Serbia	17	33%	34	67%	0	51
Switzerland	7	28%	18	72%	0	25
America						
Argentina	363	33%	727	67%	0	1,090
Brazil	1,866	33%	3,867	67%	0	5,733
Chile	415	27%	1,132	73%	0	1,547
Colombia	789	36%	1,407	64%	0	2,196
Ecuador	108	29%	267	71%	0	375
Mexico	737	35%	1,397	65%	0	2,134
Peru	1,723	30%	4,017	70%	0	5,740
Uruguay	2	50%	2	50%	0	4
United States	42	29%	103	71%	0	145

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Africa						
Morocco	425	44%	531	56%	0	956
Asia						
Vietnam	40	31%	88	69%	0	128
TOTAL	**17,797**	**33%**	**36,293**	**67%**	**0**	**54,090**

Table 31: Breakdown of employees by gender and job classification — FY255

	Women		Men		Other	
	Number	**%**	**Number**	**%**	**N**	**Total**
Junior	5,519	35%	10,238	65%	0	15,757
Professional	9,780	33%	20,300	67%	0	30,080
Manager	1,939	34%	3,831	66%	0	5,770
Sr Manager	488	24%	1,519	76%	0	2,007
Executive	70	15%	402	85%	0	472
TOTAL	**17,797**	**33%**	**36,293**	**67%**	**0**	**54,090***

* There are four employees for whom the professional category has been recorded as “not available,” due to an error of the system. They are included in the absolute total, but not in the category columns by job classification.

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Table 32: Breakdown of employees by age and job classification — FY25

	>50		30-50		<30		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Total**
Junior	739	5%	6,354	40%	8,661	55%	15,754
Professional	2,921	10%	19,855	66%	7,305	24%	30,081
Manager	1,150	20%	4,506	78%	115	2%	5,771
Sr Manager	867	43%	1,139	57%	1	0%	2,007
Executive	291	62%	181	38%	0	0%	472
TOTAL	**5,968**	**11%**	**32,035**	**59%**	**16,082**	**30%**	**54,090***

* There are four employees for whom the professional category has been recorded as “not available,” due to an error of the system. They are included in the absolute total, but not in the category columns by job classification.

FY24

Table 33: Breakdown of employees by gender and country — FY24

	Women		Men		Other		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Total**
Europe							
Belgium	138	48%	149	52%	0	-	287
Croatia	11	42%	15	58%	0	-	26
DACH	726	32%	1,573	68%	1	0.05%	2,300
Germany	684	32%	1,464	68%	1	0.05%	2,149

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Austria	32	30%	74	70%	0	-	106
Switzerland	10	22%	35	78%	0	-	45
Spain	6,651	33%	13,672	67%	0	-	20,323
France	15	31%	34	69%	0	-	49
Greece	25	26%	72	74%	0	-	97
Ireland	1	8%	11	92%	0	-	12
Italy	1,704	30%	4,072	70%	0	-	5,776
Luxembourg	28	26%	79	74%	0	-	107
Netherlands	18	31%	40	69%	0	-	58
Portugal	672	41%	982	59%	0	-	1,654
United Kingdom	436	28%	1,122	72%	0	-	1,558
Romania	595	49%	617	51%	0	-	1,212
Serbia	24	35%	45	65%	0	-	69
Switzerland	6	33%	12	67%	0	-	18
America							
Argentina	332	31%	724	69%	0	-	1,056
Brazil	1,778	34%	3,521	66%	0	-	5,299
Chile	404	26%	1,136	74%	0	-	1,540
Colombia	761	35%	1,406	65%	0	-	2,167
Ecuador	122	30%	281	70%	0	-	403

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Mexico	754	33%	1,521	67%	0	-	2,275
Peru	1,556	30%	3,640	70%	0	-	5,196
Uruguay	1	50%	1	50%	0	-	2
United States	36	27%	96	73%	0	-	132
Africa							
Morocco	265	46%	317	54%	0	-	582
Asia							
Vietnam	70	23%	228	77%	0	-	298
TOTAL	**17,129**	**33%**	**35,366**	**67%**	**1**	**0.05%**	**52,496**

Table 34: Breakdown of employees by gender and job classification — FY24

	Women		Men		Other		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Total**
Junior	5.487	35%	10.401	65%	1	0.01%	15.880
Professional	9.159	33%	19.006	67%	0	-	28.165
Manager	2.005	32%	4.226	68%	0	-	6.231
Sr Manager	412	25%	1.248	75%	0	-	1.660
Executive	66	12%	485	88%	0	-	551
TOTAL	**17.129**	**33%**	**35.366**	**67%**	**1**	**0.01%**	**52.496**

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Table 35:Breakdown of employees by age and job classification — FY24

	>50		30 to 50		<30		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Total**
Junior	647	4.%	5,795	59%	9,447	36%	15,889
Professional	2,380	8%	17,812	63%	7,973	28%	28,165
Manager	1,139	18%	4,932	79%	160	3%	6,231
Senior Manager	599	36%	1,059	64%	2	0%	1,660
Executive	316	57%	235	43%	0	-	551
TOTAL	**5,081**	**10%**	**29,833**	**57%**	**17,582**	**33%**	**52,496**

FY23

Table 36:Breakdown of employees by gender and country — FY23

	Women		Men		Other	
	Number	**%**	**Number**	**%**	**Number**	**Total**
Europe						
Belgium	140	46%	162	54%	0	302
Croatia	11	44%	14	56%	0	25
DACH	771	31%	1,685	69%	0	2,456
Germany	721	32%	1,561	68%	0	2,282

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Austria	35	33%	71	67%	0	106
Switzerland	15	22%	53	78%	0	68
Spain	6,526	32%	13,934	68%	0	20,460
France	21	38%	35	63%	0	56
Greece	27	25%	81	75%	0	108
Italy	1,699	29%	4,076	71%	0	5,775
Luxembourg	21	22%	76	78%	0	97
Netherlands	21	29%	51	71%	0	72
Portugal	617	39%	947	61%	0	1,564
United Kingdom	526	29%	1,284	71%	0	1,810
Romania	629	47%	713	53%	0	1,342
Serbia	21	32%	44	68%	0	65
America						
Argentina	309	29%	748	71%	0	1,057
Brazil	1,721	32%	3,588	68%	0	5,309
Chile	389	25%	1,154	75%	0	1,543
Colombia	635	37%	1,08	0%	0	1,715
Ecuador	93	32%	200	68%	0	293
Mexico	780	33%	1,585	67%	0	2,365

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Peru	1,464	31%	3,305	69%	0	4,769
Uruguay	0	0%	1	100%	0	1
USA	37	32%	80	68%	0	117
Africa						
Morocco	223	45%	271	55%	0	494
Asia						
Vietnam	73	24%	233	76%	0	306
TOTAL	**16,754**	**32%**	**35,347**	**68%**	**0**	**52,101**

Table 37: Breakdown of employees by gender and job classification — FY23

	Women		Men		Other	
	Number	**%**	**Number**	**%**	**Number**	**Total**
Junior	5,510	33%	11,110	67%	0	16,620
Professional	8,826	33%	18,256	67%	0	27,082
Manager	1,956	31%	4,268	69%	0	6,224
Senior manager	391	24%	1,244	76%	0	1,635
Executive	71	13%	469	89%	0	540
TOTAL	**16,754**	**32%**	**35,347**	**68%**	**0**	**52,101**

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Table 38: Breakdown of employees by age and job classification — FY23

	>50		30 to 50		<30		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Total**
Junior	628	4%	5,866	35%	10,126	61%	16,620
Professional	2,190	8%	16,915	63%	7,977	29%	27,082
Manager	1,081	17%	4,954	80%	189	3%	6,224
Senior manager	555	34%	1,077	66%	3	0.2%	1,635
Executive	292	54%	248	46%	0	-	540
Total	**4,746**	**9%**	**29,060**	**56%**	**18,295**	**35%**	**52,101**

Contract types by sex, age and occupational classification

The following tables show the total number of employees by gender, age, country and job category for fiscal years FY23, FY24 and FY25.

FY25

Table 39: Distribution of employment contract types by gender — FY25

	Women		Men		Other	
	Number	**%**	**Number**	**%**	**Number**	**Total**
Indefinite	15,988	32%	33,871	68%	0	**49,849**
Temporary	262	33%	536	68%	0	**788**
Partial	223	63%	135	37%	0	**357**

* Romania, Serbia and Morocco data is not included as it was not available.

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Table 40: Distribution of employment contract types by age group — FY25

	Women		Men		Other		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Total**
Indefinite	5.465	11%	29.661	59%	14.723	30%	**49,849**
Temporary	72	9%	341	43%	375	48%	**788**
Partial	145	41%	198	56%	14	4%	**357**

* Romania, Serbia and Morocco data is not included as it was not available.

Table 41: Distribution of employment contract types by job classification — FY25

	Executive		Senior manager		Manager		Professional		Junior		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Number**	**%**	**Number**	**%**	**Total**
Indefinite	465	1%	1.956	4%	5.500	11%	27.710	56%	14.214	29%	**49,845**
Temporary	2	0%	7	1%	20	3%	231	30%	527	67%	**788**
Partial	3	1%	38	11 %	76	21%	219	61%	20	6%	**357**

* Romania, Serbia and Morocco data is not included as it was not available.

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FY24

Table 42:Distribution of employment contract types by gender — FY24

	Women		Men		Other		
	Number	%	Number	%	Number	%	Total
Indefinite	16,757	33%	34,531	67%	1	0.00%	**51,289**
Temporary	372	31%	835	69%	0	-	**1,207**
Partial	605	55%	481	44%	1	0.09%	**1,086**

Table 43: Distribution of employment contract types by age group — FY24

	>50		30 to 50		<30		
	Number	%	Number	%	Number	%	Total
Indefinite	4,764	9%	28,944	57%	16,662	33%	**51,289**
Temporary	59	6%	438	42%	543	52%	**1,207**
Partial	259	24%	451	42%	377	35%	**1,086**

Table 44:Distribution of employment contract types by job classification — FY24

	Executive		Senior manager		Manager		Professional		Junior		
	Number	%	Number	%	Number	%	Number	%	Number	%	Total
Indefinite	528	1%	1,611	3%	6,104	12%	27,462	55%	14,665	29%	**51,289**
Temporary	3	0%	4	0%	18	2%	365	35%	650	63%	**1,207**
Partial	0	2%	45	4%	109	10%	338	31%	574	53%	**1,086**

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FY23

Table 45: Distribution of employment contract types by gender — FY23

	Women		Men		Other	
	Number	**%**	**Number**	**%**	**Number**	**Total**
Indefinite	16,096	32%	34,500	68%	0	**50,579**
Temporary	275	34%	543	67%	0	**809**
Partial	0	-	0	-	0	**0**

Table 46: Distribution of employment contract types by age group — FY23

	>50		30 to 50		<30		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Total**
Indefinite	4.561	9%	28.499	56%	18.321	36%	**50.579**
Temporary	70	9%	437	54%	281	35%	**809**
Partial	0	-	0	-	0	-	**0**

Table 47: Distribution of employment contract types by job classification — FY23

	Executive		Senior manager		Manager		Professional		Junior		
	Number	**%**	**Number**	**%**	**Number**	**%**	**Number**	**%**	**Number**	**%**	**Total**
Indefinite	536	1%	1,775	5%	6,093	12%	25,860	51%	16,289	32%	**50,579**
Temporary	5	1%	4	1%	20	2%	156	19%	623	77%	**809**
Partial	0	-	0	-	0	-	0	-	0	-	**0**

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Dismissals by gender, age and job classification

The following figures show the number of layoffs broken down by gender, age and job category for fiscal years FY23, FY24 and FY25.

FY25

Table 48: Number of dismissals by gender, age and job classification — FY25

	Women	Men	Other	Total
Executive	**0**	**6**	**0**	**6**
<30	0	0	0	0
30 to 50	0	0	0	0
>50	0	6	0	6
Senior Manager	**27**	**117**	**0**	**144**
<30	0	0	0	0
30 to 50	6	32	0	38
>50	21	85	0	106
Manager	**74**	**208**	**0**	**282**
<30	1	1	0	2
30 to 50	57	142	0	199
>50	17	66	0	83
Professional	**429**	**1,092**	**0**	**1,521**
<30	65	216	0	281
30 to 50	316	742	0	1,058
>50	62	154	0	216

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Junior	**483**	**894**	**1**	**1,378**
<30	183	408	0	591
30 to 50	255	373	1	629
>50	86	159	0	245
TOTAL	**1,069**	**2,384**	**1**	**3,454**

FY24

Table 49: Number of dismissals by gender, age and job classification — FY24

	Women	Men	Other	Total
Executive	**5**	**24**	**0**	**29**
<30	0	0	0	0
30 to 50	2	4	0	6
>50	3	20	0	23
Sr Manager	**15**	**90**	**0**	**105**
<30	1	0	0	1
30 to 50	7	52	0	59
>50	7	38	0	45
Manager	**74**	**204**	**0**	**278**
<30	0	5	0	5
30 to 50	49	142	0	191

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>50	25	57	0	82
Professional	**403**	**1,088**	**0**	**1,491**
<30	87	258	0	345
30 to 50	274	682	0	956
>50	42	148	0	190
Junior	**350**	**671**	**0**	**1,021**
<30	161	379	0	540
30 to 50	155	256	0	411
>50	34	36	0	70
Total	**847**	**2,077**	**0**	**2,924**

FY23

Table 50: Number of dismissals by gender, age and job classification — FY23

	Women	Men	Other	Total
Executive	**5**	**24**	**0**	**29**
<30	0	0	0	0
30 to 50	2	4	0	6
>50	3	20	0	23
Sr Manager	**15**	**90**	**0**	**105**
<30	1	0	0	1

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30 to 50	7	52	0	59
>50	7	38	0	45
Manager	**74**	**204**	**0**	**278**
<30	0	5	0	5
30 to 50	49	142	0	191
>50	25	57	0	82
Professional	**403**	**1,088**	**0**	**1,491**
<30	87	258	0	345
30 to 50	274	682	0	956
>50	42	148	0	190
Junior	**350**	**671**	**0**	**1,021**
<30	161	379	0	540
30 to 50	155	256	0	411
>50	34	36	0	70
Total	**847**	**2,077**	**0**	**2,924**

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Average remuneration by gender, age and job classification

The following tables show compensation by professional category and gender for fiscal years FY23, FY24 and FY25. A breakdown by age is not included, as this data is not available for the reporting period.

FY25

Table 51: Average remuneration by gender and job classification — FY25

Remuneration is shown in euros (€)

	Women	Men	Other	Total
Junior	18,972	20,196	-	**19,773**
Professional	30,186	33,587	-	**32,485**
Manager	50,982	56,149	-	**54,412**
Senior Manager	85,944	89,073	-	**88,310**
Executive	143,764	170,088	-	**166,168**
TOTAL	**31,133**	**36,148**	**-**	**34,508**

Table 52: Average remuneration by gender and job classification — FY24

Remuneration is shown in euros (€)

	Women	Men	Other	Total
Junior	16,009	18,021	XX *	**17,329**
Professional	32,285	34,959	-	**34,083**
Manager	54,893	60,006	-	**58,311**

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Senior Manager	79,189	97,301	-	**82,306**
Executive	142,453	158,404	-	155,721
TOTAL	**31,062**	**35,533**	**-**	**34,053**

* The average remuneration is not shown by confidentiality reasons, as there is only one employee.

Table 53:Average remuneration by gender and job classification — FY23

Remuneration is shown in euros (€)

	Women	Men	Other	Total
Junior	16,666	18,383	-	**17,524**
Professional	32,660	35,383	-	**34,021**
Manager	54,153	59,471	-	**56,812**
Senior Manager	79,545	96,944	-	**88,244**
Executive	121,632	134,400	-	128,016
TOTAL	**31,267**	**35,608**	**-**	**33,437**

Average remuneration of board members and executives by gender

For this financial year, no board members are being remunerated, so no information is included regarding this data.

In relation to executives, the table below presents the average remuneration of top management by gender, including fixed salary, variable compensation, bonus and expatriation allowances, where applicable. For the purposes of this indicator, top management includes top-level executives, such as the CEO and country managers, in line with the methodology applied in previous years.

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Table 54: Average remuneration of top management by gender for FY25, FY24 and FY23

Remuneration is shown in euros (€)

Average remuneration	FY25*	FY24	FY23
Women	-	487,683	469,915
Men	926,741	1,058,390	938,772
TOTAL	926,741	991,248	886,677

* This table excludes information on European top management (excludes DACH, UK, Romania, Serbia, Croatia and Morocco) as the data is unavailable at the time of the reporting.

NTT DATA Europe & Latam continues to monitor executive remuneration in accordance with its internal policies and review processes, taking into account market competitiveness, governance requirements and our broader commitment to fair and responsible compensation practices.

Gender pay gap

NTT DATA continues to advance its commitment to equal pay by driving structural actions that support greater female representation throughout the organization and contribute to the progressive reduction of the gender pay gap.

In FY25, the gap stands at 4.00%, representing a decrease of approximately 0.4 percentage points compared to FY23 (4.41%).

Table 55: Gender pay gap for fiscal years FY23, FY24 and FY25

FY25	FY24	FY23
4.00%	5.06%	4.41%

* These values correspond to the wage gap without Business Support Area (BSA), Business Process Outsourcing (BPO) and executives.

** Romania, Serbia and Morocco have not been included in this table as their data was not available.

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Employees with disabilities, and compensation measures

NTT DATA Europe & Latam continues to promote the recruitment, development and inclusion of persons with disabilities, while implementing local measures to support accessibility, labor inclusion and compliance with applicable employment quotas. In FY25, 891 professionals with disabilities were reported within our workforce, compared with 798 professionals in FY24 and 736 professionals in FY23. This represents an increase of 93 professionals compared with FY24, equivalent to approximately 11.7% year over year.

Table 56: Employees with disabilities: FY25, FY24 and FY23

Country	Legal quota required by law	FY25 %	FY25	FY24	FY23
Europe					
Belgium	0%	0%	0	0	**2**
Croatia	2%	0%	0	0	N/A
DACH	-	-	59	53	48
Austria	4%	3.70%	4	0	0
Germany	5%	2.85%	55	53	48
Switzerland	0%	0%	0	N/A	N/A
France	6%	0%	0	0	0
Greece	8%	0%	0	0	0
Italy	7%	3.50%	205	188	186
Luxembourg	2%	0%	0	0	0
Netherlands	0%	0%	0	0	0
Portugal	2%	0.82%	15	14	8
Romania	4%	1.01%	12	9	8

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Serbia	2%	0%	0	0	0
Spain	2%	1.53%	320	290	272
Switzerland	0%	0%	0	0	0
United Kingdom*	0%	N/A	N/A	6	0
America					
Argentina	0%	0.18%	2	0	**0**
Brazil	5%	4.12%	236	199	187
Chile	1%	1.16%	18	17	13
Colombia	0%	0.14%	3	5	4
Ecuador	4%	3.47%	13	10	N/A
Mexico	0%	0.09%	2	2	2
Peru	3%	0.09%	5	5	6
United States	0%	0%	0	0	N/A
Uruguay	4%	0%	0	0	N/A
Africa					
Morocco	0%	0,1%	1	0	**0**
TOTAL		**1.7%**	**891**	**798**	**736**

* FY25 data does not include the United Kingdom as the data is not available at the time of reporting.

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In several countries, local legislation establishes minimum employment quotas for persons with disabilities.

Where the required quota is not reached, companies may be required or allowed to implement alternative or compensatory measures, depending on the applicable local framework. These mechanisms may include the payment of fines or compensation levies, donations to authorized organizations, collaboration agreements with specialized entities, or the contracting of services with approved suppliers that promote the labor inclusion of persons with disabilities.

In FY25, NTT DATA Europe & Latam continued to monitor compliance with these requirements locally and, where applicable, implemented compensatory measures in accordance with national regulations:

- In Ecuador, we paid the applicable fine for not reaching the legally required quota.
- In Germany, we calculated and paid the disability compensation levy under the local framework for unfilled mandatory positions.
- In Italy, we contracted services with approved suppliers to promote the employment integration of persons with disabilities pursuant to Article 14 of Legislative Decree No. 276/2003.
- In Brazil, we maintained a conduct adjustment agreement linked to compliance with Article 93 of Law 8.213/91, which establishes the reservation of positions for persons with disabilities or rehabilitated workers.
- In Chile, we made a donation to Fundación K-Inclusión under the legal framework applicable to donations for the labor inclusion of persons with disabilities, supporting a project focused on English-language training to increase access to and permanence in employment for persons with disabilities.
- In Portugal, we signed partnership with APEC, through which an employee provides pro bono advisory support one day per week.

Overall, these measures reflect NTT DATA Europe & Latam's commitment to complying with local disability employment requirements while also supporting broader labor inclusion, accessibility and social impact initiatives that contribute to a more inclusive workplace and society.

Work organization

Working hours

In FY25 there were no significant changes in the organization of the working schedule, which continues to follow the usual model across the different countries.

The most common model is 8 hours a day, 5 days a week. However, some countries have slightly shorter working hours, such as the UK, with an average of 7.5 hours per day; Austria with 7.7 hours and France with 7.8 hours. Other examples include:

- **Spain:** The average working schedule remains around 8 hours per day, with working time arrangements combining regular and flexible formats. During the summer period (July to mid-September), a reduced schedule of approximately 35 hours per week is applied through a continuous working day.
- **Portugal:** In summer (June to August), flexible working arrangements are promoted within the standard 40-hour working week. Employees may adjust their working hours to allow for earlier finishing times on certain days. This arrangement does not imply a reduction of total working hours nor require compensation during the rest of the year.
- **Morocco:** The possibility of adjusting the working day during the Ramadan period is envisaged, respecting the country's cultural and religious practices.

These adaptations reflect our commitment to flexibility and the wellbeing of its professionals, within a framework of efficiency and respect for regional diversity.

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Absenteeism

This aspect is not considered material for NTT DATA, as the work and performance of professionals are managed by objectives, providing flexibility in the way they organize and carry out their tasks.

For NTT DATA Europe & Latam as a whole, absenteeism amounted to 1,652,971 hours in FY25, compared with 1,928,567 hours in FY24 and 1,597,109 hours in FY23. The evolution of this indicator should be interpreted in the context of changes in total headcount, local reporting practices and the different applicable labor frameworks across countries.

Initiatives to promote work–life balance and digital disconnection

In FY25, NTT DATA Europe & Latam continued to promote a broad range of initiatives aimed at supporting work–life balance, digital disconnection and the overall wellbeing of professionals.

Although the specific measures vary depending on local regulations, cultural context and business needs, the initiatives reported across the region show a common approach based on flexibility, respect for rest periods, support for families and caregivers, mental healthcare, physical wellbeing, financial wellbeing and employee engagement.

Flexible working and work organization measures remained one of the main levers to support work–life balance.

In several countries, professionals continued to benefit from hybrid work, remote work, telework or smart working policies. In the DACH region, professionals can work flexibly from home or other locations, and mobile working abroad within the EU is possible for up to 60 days per year, considering applicable tax requirements.

The DACH region also continued to apply flexible working hours and meeting-management practices, including shorter internal meetings, focus-time slots and guidance to avoid meetings before or after certain hours. Germany also applies a legal requirement for 11 consecutive hours of daily disconnection, supported through the time booking tool.

In the UK, flexible working is supported wherever operationally feasible, and employees may request to work from abroad for up to 20 working days per year, subject to approval.

Romania and Serbia also maintained flexible start times, remote work arrangements and short personal leaves during the day, while Colombia applied Flex Time to allow professionals to organize the beginning, middle or end of their working day within defined mandatory time bands.

Mexico continued to promote telework and flexible schedules through specific policies aligned with occupational health and safety requirements, including NOM 037, the official Mexican standard that regulates the safety and health conditions in teleworking.

Digital disconnection was also reinforced in several geographies, either through formal policies or through practical initiatives aimed at encouraging healthier digital habits.

The Be Flex policy, applied in countries such as Belgium, the Netherlands, France, Greece, Switzerland, Benelux and Spain, recognizes the right to disconnect and establishes that professionals are not expected to answer emails or calls outside working hours, may switch off work devices outside working time and are encouraged to use automatic absence messages or signatures clarifying that an immediate response is not required.

France also reflects the right to disconnection in its labor regulation, while Mexico has a specific Digital Disconnection Policy applicable to different working arrangements, including telework, home office, flexible schedules.

Ecuador also recognizes digital disconnection as a way to protect health, dignity at work and work–life balance. In Peru, initiatives such as Tiempo para Mí, Pausas Activas and Clubes NTT DATA help professionals take time for personal situations, practice active breaks and engage in hobbies and interests beyond day-to-day work. The latter is also implemented in Spain with a large variety of Energy Clubs, such as running, yoga, reading, music, padel, gaming and more

In Romania and Serbia, disconnection is encouraged through mindfulness sessions, relaxation spaces, gaming or meditation rooms, regular breaks, reminders to use annual leave and offline activities that promote face-to-face interaction.

Family support and conciliation measures were another significant area of action during FY25.

Argentina continued to promote NTT DATA Family, which includes extended maternity and paternity leave beyond local legal requirements, gradual return-to-work schemes and associated family benefits. Brazil reported extended family-related leave and absence measures, including six months of maternity leave, 20 days of paternity leave, marriage leave, bereavement leave, pregnancy loss leave and unpaid leave.

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The US provides 16 weeks of fully paid parental leave for employees welcoming a child through birth or adoption, while the UK applies keeping-in-touch days and phased returns to work, and employees returning from maternity leave may work 80% of their time while receiving full pay during a three-month phased return period.

Romania and Serbia continued to develop Parents We Care, a community that offers resources and workshops on pregnancy, parenting, child education and elder care, and implemented return-to-work support after maternity leave.

Italy promoted Essere Genitori, including team coaching for new parents, a baby kit, orientation initiatives and working groups on parenthood. Portugal opened a maternity space in the Lisbon office to provide privacy and comfort for breastfeeding employees, while Peru's Familia NTT DATA supports professionals and their families through initiatives such as Digital Baby, school loans and Digital Kids.

In Spain, NTT DATA also worked on and obtained the emergency first response (EFR) certification, Empresa Familiarmente Responsable, promoted by Fundación Másfamilia, with the aim of strengthening the management of work, family and personal life balance, improving employees' quality of life. This certification recognizes organizations that are committed to promoting a better balance between the personal and professional lives of their employees, reinforcing NTT DATA Spain's broader approach to family support, flexibility and conciliation across the region.

Overall, the initiatives implemented during FY25 show that NTT DATA Europe & Latam continued to strengthen a people-centered working model. The company's approach combines formal policies, such as flexible work, teleworking, parental leave and digital disconnection, with practical support measures covering mental health, physical wellbeing, family needs, financial stability and social connection. This combination contributes to protecting rest time, supporting professionals in different life stages and promoting healthier, more inclusive and more sustainable ways of working across the region.

Occupational health and safety

NTT DATA maintains and strengthens its occupational risk prevention measures and policies in the countries in which it operates, reaffirming our commitment to ensure the maximum safe, hygienic, ergonomic and healthy working conditions for each of our professionals, ensuring:

- Compliance with the applicable legislation on occupational risk prevention, other commitments and agreements that NTT DATA subscribes to in this field
- The promotion of continuous improvement of the performance management system and occupational risk prevention behaviors and standards
- Encouraging the participation, information, training and consultation of all staff to maintain an adequate level of prevention

Health and safety policies and plans exist in all countries, as well as procedures for investigating accidents, incidents and occupational illnesses occurring on company premises or at customer premises. In Spain, the company implements measures to prevent risks that could result in occupational accidents or other harm to employees' health, and to ensure compliance with applicable occupational health and safety legislation.

Accidents, frequency and severity

The formulas for calculating the Severity and Frequency Index used are those available from the Spanish Ministry of Employment and Social Security, maintaining the same methodology applied in previous years, which ensure the comparability of results over time.

The frequency index (FI) represents how many working hours a lost-time accident occurs in each period. The following formula has been used to calculate it:

*FI = No. accidents / (No. hours worked per year x average number of professionals) * 1,000,000*

The severity index (SI) relates to time not worked because of occupational accidents to the time worked by the professionals exposed to the risk.

*SI = No. of days lost due to sick leave / (No. of hours worked per year * average number of professionals) * 1,000 hours*

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An accident at work is considered to be any event that causes harm to the professional, occurs during the exercise of their work activity and generates medical leave, such as falls, slips, cuts and more.

This calculation does not include accidents on the way to work, common illnesses (flu, COVID-19, operations), maternity, paternity and breastfeeding leave, as well as incidents that do not result in sick leave (minor cuts, minor falls and more).

The number of workplace accidents reported in FY25 decreased significantly from FY23 (22 versus 28 incidents; -21%), reflecting an improvement in our health and safety performance.

FY25

Table 57: Accidents per gender, frequency and severity index — FY25

	Accidents			Manager		Professional	
Country	**Women**	**Men**	**Total**	**Women**	**Men**	**Women**	**Men**
Europe							
Germany	1	0	1	0.94	0.00	0.02	0.00
Portugal	1	1	2	0.80	0.50	0.00	0.00
Spain	3	1	4	0.24	0.04	0.00	0.00
America							
Argentina	0	1	1	0.00	0.72	0.00	0.01
Brazil	6	2	8	1.52	0.24	0.00	0.00
Colombia	3	1	4	2.08	0.39	0.04	0.00
Ecuador	0	1	1	0.00	1.87	0.00	0.00
Mexico	1	0	1	0.72	0.00	0.08	0.00
TOTAL	**15**	**7**	**22**				

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FY24

Table 58: Accidents per gender, frequency and severity index — FY24

	Accidents			Manager		Professional	
Country	**Women**	**Men**	**Total**	**Women**	**Men**	**Women**	**Men**
Europe							
Germany	0	1	1	0.00	0.26	0.00	0.00
Spain	4	4	8	0.11	0.11	0.00	0.00
Italy	1	1	2	0.09	0.09	0.00	0.00
America							
Argentina	3	0	3	0.09	0.00	0.00	0.00
Colombia	1	4	5	0.27	1.06	0.00	0.00
Ecuador	1	0	1	1.38	0.00	0.00	0.00
Peru	0	1	1	0.00	0.10	0.00	0.00
Mexico	1	0	1	0.72	0.00	0.08	0.00
TOTAL	**10**	**11**	**21**				

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FY23

Table 59: Accidents per gender, frequency and severity index — FY23

	Accidents			Manager		Professional	
Country	**Women**	**Men**	**Total**	**Women**	**Men**	**Women**	**Men**
Europe							
Germany	1	2	3	0.78	0.73	0.00	0.00
Belgium	0	1	1	0	3.35	0	0
Italy	1	1	2	0.31	0.13	0.03	0.00
Netherlands	0	1	1	0	9.94	0	0.4
Portugal	2	1	3	1.96	0.63	0	0.01
Spain	2	6	8	0.17	0.24	0.02	0.01
America							
Brazil	2	1	3	0.93	0.21	0.01	0
Chile	1	1	2	1.32	0.46	0.04	0
Colombia	3	0	3	3.04	0	0.01	0
Ecuador	0	1	1	0	3.41	0	0.01
Peru	0	1	1	0	0.13	0	0
TOTAL	**12**	**16**	**28**				

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Workplace incidents

In FY25, four countries reported cases of work-related ill health, with 11 individuals affected: Brazil (4), Colombia (1), Portugal (5) and Spain (1). Most cases related to work-related mental health conditions. In FY24, 10 individuals with work-related ill health were reported across three countries.

There were no work-related fatalities in FY25.

Social dialogue

Professionals covered by collective bargaining agreements

NTT DATA professionals are covered by collective bargaining agreements that regulate working conditions.

As in the previous financial year, these agreements establish key aspects such as salaries, working hours, vacation entitlements, workplace safety, social benefits and mechanisms for conflict resolution. Their main purpose is to guarantee minimum rights for professionals, promote a balance between the parties, and provide a framework that regulates labor relations, ensuring transparency and stability in the workplace.

The table below shows the percentage of professionals covered by agreement, broken down by country, in accordance with the applicable regulations.

Table 60: Professionals covered by collective bargaining agreements, FY25, FY24 and FY23

	FY25	FY24	FY23
Europe			
Belgium	100	100	100
Germany	98	98	98
Austria	98	98	99
Switzerland	98	98	N/A
France	100	100	100
Italy	100	100	100
Spain	100	100	100

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Portugal	100	100	100
Romania	100	100	100
Serbia	100	100	100
America			
Brazil	100	100**	>99
Africa			
Morocco	100	100	N/A

* Countries without collective bargaining agreements are excluded.

** The number for Brazil FY24 has been corrected, it is 100% for FY24.

Methods of participation and communication

In addition to the collective bargaining frameworks described above, some NTT DATA Europe & Latam countries have employee representation bodies or equivalent structures that support social dialogue and provide formal channels for participation and communication.

These bodies focus on safeguarding labor rights, representing employee interests and facilitating dialogue between professionals and the Company, in accordance with the applicable local legal frameworks and practices. This representation may take different forms depending on the country, including works councils, staff delegations, trade unions, statutory employee representation, workers' representatives or elected employee representatives.

Table 61: Structures for social dialogue, by country

Country	Structure	Communication channels and frequency
Austria	Voluntary trade unions and statutory employee representation	Individual meetings on request

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Belgium	Works Council and Committee for Preven-tion and Protection at Work	Made up of employer representatives, and elected employee representatives. The committee meets at least once a month, normally on the first Tuesday of the month. Members are notified electronically at least eight working days before each meeting, and the agenda is drawn up by the chairperson and secretary no later than six working days before the meeting. Communication with employees includes the meeting schedule, agenda, activity reports, conclusions, an annual action plan, annual internal prevention service report, follow-up to Committee opinions and meeting minutes, which may be shared through printed materi-als, the Company intranet or email.
France	Social and Economic Committee (CSE)	Made up of employer representatives and elected employee representatives, the CSE meets at least once every two months. At least four meetings per year cover health, safety and working conditions. Meetings are convened by email or hand-delivered notice, with the agenda communicated at least three days before the meeting. Once adopted, meeting minutes and deliberation reports are communicated to employees, excluding confidential information where applicable.
Germany	Independent works councils by office or group of offices	• Quarterly meetings with professionals • Mailing lists for updates • Participation in internal projects • Dedicated website with contact details, news and feedback channels
Italy	Trade unions, mainly in Rome and Milan	• Biannual meetings and discussions on specific regulatory matters • Private spaces for meetings with workers • Online meetings for broader participation • Mailing lists for updates
Luxembourg	Staff Delegation	Meetings once every two months.
Morocco	Workers' representa-tives	• Regular meetings between management and staff representatives • Internal communications and employee feedback channels Social dialogue is maintained through ongoing interaction between employees and management to address workplace topics and concerns.

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Portugal	FETESE and other representative organizations for NTT DATA Portugal, S.A. and NTT DATA Portugal Centers, and through AGEFE and FEPCES for NTT DATA BPO Portugal	Several figures and channels through which professionals can raise concerns or share feedback, including career development advisors, business-unit managers, mentors, the Portugal Orienta mailbox and other internal communication channels.
Romania	Three employee repre-sentatives are elected every two years	• General assembly meetings • Feedback surveys every two years • Participation of representatives in exit interviews • Other feedback channels
Spain	Works Council of NTT DATA Spain Centers, S.L.U. and ASC and CCOO trade union sections	Meetings on request and regular information sent to employee representatives and professionals.
United Kingdom	Prospect Union	

This approach enables NTT DATA Europe & Latam to maintain open dialogue with professionals across its geographies, combining formal representation where applicable with broader mechanisms for communication, consultation and engagement.

Training

NTT DATA's main asset is its people. For this reason, one of our priorities is to promote the comprehensive development of its professionals through a learning culture based on curiosity, collaboration, continuous improvement and personalized development.

In this context, NTT DATA University continues to provide a structured learning framework through its Knowledge Schools and Academies, enabling professionals to acquire the knowledge and skills needed to respond to current and future business challenges. This framework is complemented by local training initiatives, both in-person and virtual, according to the needs of each country, business unit, role or project. These initiatives include technical training, soft skills programs, language courses, bootcamps, compliance training, leadership development, Udemy licenses and other specialized learning resources.

In January 2026, we also developed learning paths for employees America, Benelux and France, Greece, Portugal, Spain and Switzerland. These are training programs designed to support employees' professional development in alignment with their current role and the business unit in which they work. They are structured around three main categories: Core skills, culture and values, and smart compliance. Their purpose is to strengthen key competencies, promote a corporate culture aligned with the organization's values, and ensure that professionals understand and apply regulatory and compliance principles in their daily work.

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We continue to rely on learning management tools to organize and deliver training. In some regions and countries (Latam, Portugal, Spain, Benelux, France, Switzerland and Greece), the learning management system operates as a central training portal through which professionals can access the training assigned to them according to their role, unit, sector or country. Local teams complement this platform with additional training mechanisms adapted to local priorities and employee needs.

In FY25, the total number of training hours reported by NTT DATA Europe & Latam amounted to 1,100,884 hours, compared with 1,640,251 hours in FY24. The FY25 figure should be interpreted taking into account the current limitations on data availability and reporting consistency across countries. Italy and Morocco did not report training hours for FY25.

A breakdown of training hours by professional category is not available for FY25. Several countries are currently unable to provide this level of detail due to differences in local systems, data availability and reporting processes. NTT DATA Europe & Latam is working to improve the organization and harmonization of training data across geographies, with the aim of enabling more detailed reporting by professional category in future reporting periods.

Table 62: Number of training hours by country for FY25, FY24 and FY23

	Training hours		
Country/region*	**FY25**	**FY24**	**FY23**
Europe			
Belgium	4,476	4,853	8,423
Croatia	N/A	N/A	N/A
France	719	1,066	873
DACH**	112,089	121,512	30,464
Greece	1,483	3,782	1,436
Italy	N/A	172,251	162,773
Luxembourg	1,691	1,369	1,598
Netherlands	1,459	2,255	4,043
Portugal	49,983	79,944	44,759
Romania***	40,356	62,717	6,007

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Serbia	-	2,190	315
Spain	435,037	610,555	438,577
Switzerland	122	407	507
United Kingdom	40,976	38,633	25,741
America			
Argentina	18,557	45,867	27,577
Brazil	124,923	185,055	152,588
Chile	34,344	54,393	55,905
Colombia	31,833	54,230	38,094
Ecuador	12,157	17,452	2,798
Mexico	47,191	48,386	5,560
Peru	138,701	107,681	163,418
United States	758	2,285	0
Uruguay	13	7	N/A
Africa			
Morocco	4,016	23,363	3,855
TOTAL	**1,100,884**	**1,640,251**	**1,175,311**

* Countries with no data available are shown as N/A. Interns' training hours have been considered in the totals by country.

** DACH includes training hours for Germany, Austria and Switzerland DACH.

*** Romania includes training hours for Romania and Serbia.

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Equity

We believe in the uniqueness of every individual and the value each person brings to the organization, and we work continuously to ensure equal opportunities and foster an inclusive and respectful environment for all our professionals.

The Diversity, Equity and Inclusion Policy, which sets out guidelines for the inclusion of different groups, including women, persons with disabilities, the LGBTQ+ community and people of different ages, races, nationalities, cultures and religions, was not updated during the financial year, with the framework defined in previous years remaining in force and highlighting the unique qualities and individuality of each person.

Diversity Strategy 2025/2026

This strategy, in force for the 2025/26 period, aims to establish a common approach across all regions, integrating diversity and inclusion across the board into talent management, corporate culture and decision-making.

Through this strategy, we seek to maximize our positive impact on both the professional development of individuals and society as a whole.

The strategy focuses on raising awareness of unconscious bias, improving key processes such as recruitment and promotion, fostering an inclusive and safe working environment, and developing specific training and mentoring programs. It also involves adapting global initiatives to local contexts and needs.

[3]WCAG: Web Content Accessibility Guidelines

Accessibility

In FY25, NTT DATA Europe & Latam continued to strengthen universal accessibility through a combination of physical, digital and organizational measures designed to ensure that professionals with disabilities can access offices, workstations, emergency procedures and virtual workspaces under the best possible conditions.

These measures are implemented locally, considering the characteristics of each office, the applicable legal requirements and the specific needs of the professionals working in each building.

Across the region, the most common physical accessibility measures include ramps, accessible entrances, adapted doors, lifts, Braille or tactile lift buttons, voice lift systems, accessible toilets, parking spaces for persons with disabilities, wheelchair-accessible routes, adapted turnstiles, ergonomic furniture and height-adjustable desks. Several countries also reported measures linked to health and safety and emergency management, such as evacuation chairs, dedicated safe waiting areas, communication systems for emergency situations, trained support personnel and tailored evacuation procedures.

In addition to infrastructure measures, NTT DATA Europe & Latam continued to promote digital and assistive accessibility.

Several countries reported the use of accessible digital tools, subtitles, screen-reader-compatible functionalities, immersive reader features, Microsoft Office accessibility tools, accessible email solutions, integrating WCAG 2.1[3] criteria in internal tools, audio description practices, and individual adaptations of office tools or equipment. These measures are particularly relevant in a hybrid working environment, where accessibility must be ensured not only in offices but also in the digital spaces where professionals collaborate.

Some initiatives are especially worth highlighting. In Italy, accessibility is supported through trained Health and Safety Tutors. Offices have dedicated “quiet spaces” in emergency stairwells for employees with mobility impairments to safely wait for the Emergency Team during evacuations. These are equipped with two-way intercom systems and evacuation chairs, allowing evacuation procedures to be adapted to the needs of each person.

In Chile, reasonable adjustment reports are prepared when a person is hired so that any necessary adaptation to the workstation can be identified from the start.

In the DACH region, disability representatives act as points of reference for the interests of persons with disabilities in the workplace.

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In Portugal, measures include accessible email solutions for people with visual impairments, lifts with Braille and voice access, wheelchair-accessible lifts and open-space layouts that facilitate mobility.

In Brazil, Braille signage and audio description practices are used to improve both physical and meeting accessibility.

In Argentina, office accessibility tools such as subtitles, screen readers and image descriptions are used to support virtual accessibility.

Health and safety teams also continue to assess compliance with applicable accessibility regulations and to review emergency and evacuation procedures to ensure that they address the specific needs of the people working in each building. In Spain, for example, office accessibility is framed within the applicable national and local regulations, including the DB-SUA 9 accessibility requirements of the Technical Building Code. Overall, the measures reported for FY25, shown in the table below, reflect a practical and progressive approach to accessibility, combining legal compliance, inclusive workplace design, assistive technologies and personalized support.

Table 63: Measures for improving accessibility

Country	Physical measures	Virtual and assistive measures
Argentina	Adapted toilet for people with reduced mobility in the Parque Patricios office; access ramps and adapted turnstiles.	Use of accessibility tools included in Mi-crosoft Office, such as subtitles, screen reader functionalities and image descrip-tions
Austria	• Lift with highlighted and tactile floor numbers • Ramps • Parking spaces for persons with disabilities • Illuminated or acoustic signs and guide plaques • Height-adjustable desks • Partial self-opening doors	Disability representative acting as a point of reference for the interests of persons with disabilities in the workplace
Brazil	• Braille signage in meeting rooms and office department signs • Braille signage for items in the coffee area, including water dispensers and waste bins	Audio description practices in online and face-to-face meetings, helping partici-pants identify who is speaking

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Chile	• Adapted toilets • Evacuation chair for building evacuation • Inclusive furniture suitable for wheelchair users and nonwheelchair users • Ramp at building entrance	Reasonable adjustment reports prepared whenever a person is hired, to identify and implement any workstation adapta-tions required
Colombia	• Ramps at building entrance • Access door for people with reduced mobility next to the turnstiles • Lifts to reach floors 5 and 7, with Crew support to enable access to floor 6 when needed	
Ecuador	• Accessible entrances and ramps in the Panamericana and Zaigen offices • Adapted toilets in the Panamericana office	
Germany	• Ramps in Ettlingen • Braille lift buttons in Munich and Cologne • Voice lift in Cologne; accessible lifts in Frankfurt, Munich, Wolfsburg and Stuttgart • Automatic main entrance in Cologne and one automatic main entrance in Stuttgart • Accessible toilets in Frankfurt and Munich • Accessible parking spaces in Munich, Ettlingen and Cologne • Height-adjustable desks	Disability representative

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Italy	• Parking spaces for employees with disabilities, requested via our Health and Safety function • Dedicated “quiet spaces” in emergency stairwells in offices such as Torino, Milano, Pisa, Roma and Napoli for employees with mobility impairments to wait for emergency teams • Two-way intercom systems in these quiet spaces to communicate with emergency teams • Evacuation chairs in Milano, Torino, Villorba, Pisa, Roma, Rende and Napoli • Trained Health and Safety Tutors to support colleagues with disabilities during emergency situations	Adaptation of company procedures to the type of disability — a distinction is made between individuals who can move inde-pendently but require guidance and those who require physical assistance or transport
Mexico	• Braille office signage • Access ramps • Lifts with auditory stimuli to indicate reference floors	
Morocco	• Accessible office entrance with ramp • Elevators to facilitate access for persons with disabilities • Accessible restrooms	
Portugal	• Disability-adapted toilets • Lifts with Braille and voice access • Freight and wheelchair-accessible lifts • Open-space working areas allowing for greater mobility for wheelchair users • Wheelchair-accessible turnstiles • Accessible interior and entrance doors	Development of accessible email solu-tions for people with visual impairments

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Romania	• Doors, toilets and desks adapted to wheelchair users in all branches • Designated parking spaces in Brașov, Iași, Sibiu and Timișoara • Basement parking with lift access in Cluj • Ramps and lifts in all branches • Braille lift buttons in Cluj • Illuminated or acoustic signs and guide plaques in Iași • Height-adjustable desks and gym balls in all branches.]	Some WCAG 2.1 criteria present in intra-net, internal tools and apps, including meaningful content order, no time limits, no flashing content and clear page titles; immersive reader feature in Outlook
Serbia	• Designated parking spaces in Novi Sad • Ramps and lifts	Some WCAG 2.1 criteria present in intra-net, internal tools and apps, including meaningful content order, no time limits, no flashing content and clear page titles; immersive reader feature in Outlook.
Spain	• Accessible routes connecting public areas, main entrances, common areas and floors • Accessible lifts or ramps where required • Doors, passageways and maneuvering spaces suitable for wheelchair users • Accessible toilets and changing areas in public-use buildings • Accessible parking spaces connected to accessible routes • Clear, understandable and perceptible signage, including contrast, pictograms and tactile or visual guidance, where applicable. These measures are aligned with applicable national and local accessibility regulations, including DB-SUA 9 of the Technical Building Code.	
Switzerland	• Lifts and revolving doors supporting access for people with physical disabilities; office tools adaptation where needed.	Subtitles on SharePoint videos

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Switzerland DACH	• Braille lift buttons • Parking spaces for persons with disabilities • Accessible wheelchair entrances in Zurich • Accessible lifts in Zurich, although without Braille	Disability representative
United Kingdom	• Parking spaces for persons with disabilities • Ergonomic equipment as part of reasonable adjustments	Access to work support, including equip-ment and assistive support

Health and Safety teams continue to assess compliance with local accessibility requirements and review emergency and evacuation procedures, with the aim of ensuring that the needs of persons with disabilities or reduced mobility are considered in each building.

This includes measures such as evacuation chairs, accessible parking, adapted routes and specific support mechanisms where required. Overall, these initiatives reinforce NTT DATA Europe & Latam's commitment to creating safer, more inclusive and more accessible working environments in both offices and in virtual spaces.

Human rights

NTT DATA Europe & Latam is committed to respecting the human rights of all people with whom the business, including professionals, clients, suppliers, business partners and other stakeholders.

This commitment is embedded in our way of working and is supported by policies, processes and local measures designed to prevent, identify and address potential human rights risks across our operations and value chain.

In coordination with general management and various operating areas, we promote policies and processes aimed at preventing and reducing conflicts and high-risk situations in labor, commercial and supplier relationships. This approach is based on respect for internationally recognized human rights and labor standards, including the principles established by the International Labour Organization (ILO) and the United Nations Global Compact, of which NTT DATA is a member.

Human Rights Policy

NTT DATA Europe & Latam has a Human Rights Policy that reaffirms our commitment to respecting and promoting human rights in our operations and in our relationships with stakeholders. The policy identifies the most relevant human rights areas for our activity and establishes the principles that guide its conduct in this area.

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The priority areas recognized by the policy include:

- The prohibition of discrimination
- The prohibition of forced labor and child labor
- Fair wages
- Freedom of expression
- The right to use technology in accordance with strict ethical standards
- The responsible use of data and protection of privacy
- The right to work in a healthy and safe environment
- Respect for human and labor rights
- The promotion of a culture of respect for human rights

This policy is aligned with international standards and supports the integration of human rights principles into our operations and value chain. Through this framework, NTT DATA Europe & Latam seeks to promote responsible, ethical and sustainable practices consistent with the organization's values and commitments.



Measures to prevent harassment and protect dignity at work

As part of our broader human rights approach, NTT DATA Europe & Latam has implemented local measures aimed at preventing harassment, protecting dignity at work and promoting safe and respectful workplaces.

These measures are adapted to each country's legal framework and may include policies, internal procedures, prevention protocols, employee representative bodies, committees or specific channels to address psychosocial risks, workplace dignity, violence, harassment or discrimination.

Together, these local measures, shown in the table below, reinforce our commitment to ensuring a work environment based on respect, dignity, equal treatment and prevention of harassment or discriminatory conduct. They also complement our human rights governance by providing country-level mechanisms to address risks that may affect professionals in their daily work environment.

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Table 64: Local measures for the prevention of harassment

Country	Specific measures reported
Europe	
Belgium	Psychosocial burden procedure
Croatia	Employee dignity protection, including the appointment of a person other than the af-fected professional to receive and resolve complaints related to dignity protection
France	Prohibition of moral harassment under Article L.1152-1 of the French Labor Code and CSE mechanisms
Germany	Arbeitsordnung (work rules)
Greece	Policy against violence and harassment in the workplace
Italy	PdR125 Gender Equality Certification
Luxembourg	Harassment policy
Portugal	Local conduct guide
Romania	Dignity at Work Policy
Serbia	Regulation on the prevention of abuse at work in accordance with the Serbian legisla-tive framework
Spain	Sexual harassment prevention and sanction policy; moral harassment policy
United Kingdom	Anti-harassment and bullying policy; sexual harassment policy; equal opportunities pol-icy
America	
Chile	Protocol for the prevention of sexual harassment, workplace harassment and violence at work
Colombia	Coexistence Committee
Ecuador	Sexual harassment prevention and sanction policy

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Mexico	Anti-harassment protocol and internal work regulations
Peru	Sexual harassment prevention and sanction policy
United States	Employee Handbook
Africa	
Morocco	Internal regulations established in accordance with Articles 138 and 139 of Law 65-99 forming the Moroccan Labor Code

Overall, during FY25, NTT DATA Europe & Latam continued to reinforce its human rights approach through a combination of regional policies, due diligence processes, supplier risk management tools and local measures to prevent harassment and protect dignity at work. This framework supports our objective of identifying and mitigating potential risks while promoting a culture of respect, inclusion, safety and responsibility across its operations and relationships with stakeholders.

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