

REPORT UNDER THE FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT

INTRODUCTION

This report has been prepared for the financial year ending March 31, 2024, pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**"). This report describes the steps that NTT DATA Canada, Inc. "**[NTT DATA]**" has taken to prevent and reduce the risk of forced labour and child labour in NTT DATA's supply chain.

NTT DATA's Board of Directors approved this report as attested below on April 28th, 2025.

1. STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

NTT DATA's Structure

NTT DATA is a corporation incorporated under the *Canada Business Corporations Act*. The registered office is situated in Nova Scotia. It is a privately held corporation. The board of directors consists of Pamela Johnson, Bill Karras and Karen Ruth Prince-Wright.

NTT DATA has one [1] reporting subsidiaries which is incorporated under the *Business Corporations Act (British Columbia)*. The subsidiary is NTT DATA BCU, Inc.

NTT DATA BCU, Inc. does not meet the threshold tests under the Act and is therefore not required to report. NTT DATA BCU, Inc. is included for informational completeness only.

NTT DATA's Business & Activities

NTT DATA is an Information Technology Services company. NTT DATA offers business consulting services, business process outsourcing, software development and application management among other services. At present, NTT DATA is headquartered at 2000 Barrington Street, Suite 300, Halifax, NS, B3J 3K1. As of March 31, 2023, NTT DATA employed 1,202 persons and NTT DATA BCU, Inc. employed 528 persons engaged in providing information technology services for clients.

NTT DATA's Supply Chain

NTT DATA uses large Canadian Original Equipment Manufacturer (OEM) suppliers such as Dell Canada to fill client requirements and provide infrastructure to manage supplier needs. NTT DATA purchases computer hardware and related equipment. NTT DATA does not have access to information with respect to the origin of the products, but anticipate the equipment mostly originates in China.

NTT DATA aims to source locally to the greatest extent possible.

2. POLICIES & DUE DILIGENCE PROCEDURES

All of NTT DATA procurement contracts require suppliers to adhere to all applicable laws, including all federal, provincial, municipal, local, or other laws, rules, statutes, regulations, orders, codes, judgments, decrees, treaties or other requirements having the force of law.

Supplier Code of Conduct

NTT DATA's Supplier Code of Conduct (the "**Code**") applies to all suppliers and imposes specific requirements on its suppliers with respect upholding the human rights of workers at any tier of its supply chain, and to treating them with dignity and respect. Workers include direct employees, temporary workers, migrant workers, student workers, contract workers, and any other person(s) providing labor and employment services to a supplier.

NTT DATA has a zero-tolerance policy regarding trafficking in persons. All NTT DATA suppliers, contractors and subcontractors shall include the substance of the Code in all subcontracts in support of NTT DATA business. Suppliers shall have a compliance plan in place to ensure that human trafficking and forced labor are not used and that risks of worker exploitation are mitigated.

Child labor may not be used in any tier of the supply chain. The term "child" refers to any person under the age of 18, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest.

Should a supplier be non-compliant with the Code, they may face consequences such as termination or reduction of business with the supplier, institution of required remediation plans, and/or termination of NTT DATA's Agreement with the supplier.

The Code is reviewed and updated annually. It is sent to all suppliers annually requesting that each individual within their organization who provides products to NTT DATA reviews The Code and completes the training within. Furthermore, We require newly retained supplier resources to complete Code of Conduct training within 30 days of delivering services to NTT DATA.

Additionally, NTT DATA monitors suppliers on an ongoing basis, conducted through the Ariba Risk Monitoring service with activated alerts covering labour issues, illegal trade, regulatory compliance, sanctions and ethical issues.

Global Policy Against Trafficking in Persons and Slavery

NTT DATA has a global policy against trafficking in persons and slavery. The entire company workforce including others acting on behalf of the company, are required to read, understand, and abide by the provisions referenced in this policy, including its suppliers.

Code of Business Conduct and Ethics and Whistleblower Policy

NTT DATA has a Code of Business Conduct which functions as a guide that explains our standards and defines appropriate responses to common and recurring issues. It covers our work environment conflicts of interest, technology use and privacy, gifts, business relationships, doing business globally, dealings with government agencies & the media, accuracy of reports, concerns regarding accounting/auditing/fraud/money laundering and compliance.

The Code of Business Conduct includes a whistleblowing provision, and strictly prohibits discrimination or retaliation in any form against Employees for making good faith reports of their concerns. Every NTT DATA employee is required to complete annual training on the Code of Business Conduct.

3. FORCED LABOUR AND CHILD LABOUR RISKS

As part of the Code, and to enforce the policy prohibiting the utilization of forced or indentured child labor, NTT DATA may conduct any reasonable due diligence to determine whether forced or indentured child labor is utilized at any tier of its supply chain.

Between October and December of 2024 NTT DATA performed two risk assessments with respect to potential human rights issues. This exercise involved the following:

1. Risk assessment

- a. Measure the impact of risk for each human rights issues.
- b. Analyze severity and probability based on collected data.

2. Vulnerability assessment

- a. Measure the degree of management for each human rights issues.
- b. Assess whether risks are being adequately managed within North America.

The findings indicated that NTT DATA was found to have an overall low risk score based on:

- Number and severity of the incidents (no forced labour or child labour incidents)
- measures in place prevent detect, report and mitigate incidents (policies, training, monitoring, grievance mechanisms).

4. REMEDIATION MEASURES

To date, NTT DATA has not become aware of any forced labour or child labour in its activities and supply chains. As a result, NTT DATA has not taken any remedial measures.

5. REMEDIATION OF LOSS OF INCOME

To date, NTT DATA has not become aware of any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains. As a result, NTT DATA has not taken any remedial measures with respect to loss of income as a result of efforts to reduce forced and child labour.

6. TRAINING

The Global Policy Against Trafficking in Persons and Slavery applies to the entire company workforce. All employees, including others acting on behalf of the Company, are required to read, understand, and abide by the provisions referenced in this policy, including its suppliers.

7. ASSESSING EFFECTIVENESS

As discussed above, NTT DATA has not become aware of any risks of forced labour or child labour in its supply chains. In order to assess the effectiveness of its efforts, NTT DATA will continue to monitor the effectiveness of our training programs and our codes of conduct.

ATTESTATION

This Report was approved pursuant to subparagraph 11(4)(b)(ii) of the Act by the Board of NTT DATA.

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In accordance with the requirements of the Act, and in particular section 11 thereof I, the undersigned, attest that I have reviewed the information contained in the report for the entities specified below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects, for the purposes of the Act, for the reporting year specified above.

I make the above attestation in my capacity as a director of the Board of Directors of NTT DATA, for and on behalf of NTT DATA.

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of NTT DATA.

In accordance with the requirements of the Act, and in particular section 11 thereof I, the undersigned, attest that I have reviewed the information contained in the report for the entity specified below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects, for the purposes of the Act, for the reporting year specified above.

I make the above attestation in my capacity as a director of the Board of Directors of NTT DATA.

I have the authority to bind NTT DATA.

DocuSigned by:
Per: Pam Johnson
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Name: Pamela Johnson
Title: President, NTT DATA Canada, Inc.
Date: _____, 2025 May 9, 2025 | 6:35 PM CDT