

Human Rights Policy

A photograph of three business professionals in an office setting. A woman with curly hair, wearing a white shirt, is smiling and shaking hands with a man in a dark suit and glasses. Another person is partially visible in the foreground on the right. A white geometric graphic, consisting of a large circle and intersecting lines, is overlaid on the right side of the image.

Last updated: June 2026
Produced by: Corporate
Sustainability and Compliance &
Risk Management

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1. Introduction

The IBIOL Regional Unit, comprising NTT DATA Spain S.L.U and its subsidiaries (“the Regional Unit”), is a group of companies committed to respecting the human rights of all those with whom it interacts, whether they are employees, customers, suppliers, partners, other third parties or other stakeholders. Our aim is to ensure and promote the protection of human rights across all company operations and its value chain.

In the unlikely event of any adverse impact on human rights, we will take appropriate measures and will continuously review and improve our business operations. We will also carry out a due diligence process with a view to establishing and maintaining a corporate structure that respects human rights at all times.

2. Definitions

- **Human rights** Human rights are rights inherent to all human beings, without distinction of any kind based on race, sex, nationality, ethnic origin, language, religion or any other status. Everyone is entitled to all rights, without distinction of any kind (United Nations, 2023).
- **Universal Declaration of Human Rights:** Drafted by representatives from all regions of the world, each with different legal and cultural frameworks, the Declaration was adopted by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievement for all peoples and all nations.
- **Forced or compulsory labour:** All work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (Article 2.1 of ILO Convention No. 29).
- **Discrimination:** The term ‘discrimination’ covers all forms of direct discrimination, any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation (Article 1.1 of ILO Convention No. 111): (Article 1.1 of ILO Convention No. 169).
- **Due diligence:** According to the Guiding Principles on Business and Human Rights, the term ‘due diligence’ in the context of human rights refers to an ongoing management system that a company adopts in accordance with the sector in which it operates. It takes into account the nature of its activities, the context in which it operates, the size of the company and other factors to ensure that human rights are respected and that it does not contribute to human rights violations. This process involves ‘identifying, preventing, mitigating and accounting for’ any potential negative impacts caused by the company.

3. Scope of application

This policy sets out and formalises our commitment to implementing a due diligence process to identify, prevent, mitigate and, where necessary, remedy any adverse human rights impacts associated with our activities and global value chain, and it applies to all our stakeholders.

In coordination with the General Management and the different operational areas, the company seeks to promote policies and processes that prevent and reduce conflicts and high-risk situations in all its labour and commercial relations, as well as in its global value chain.

The policy will be shared in operations over which **NTT DATA** Spain S.L.U. does not exercise full or effective control, encouraging compliance with its principles and guidelines, and we will take all measures within our power to ensure that third parties adopt these principles and do not infringe human rights.



4. Legal framework

In order to manage human rights within the company, the following international covenants and conventions are taken into account and compliance with them is promoted.

4.1 International standards

- The United Nations International Charter of Human Rights, which comprises:
 - Universal Declaration of Human Rights.
 - International Covenant on Economic, Social and Cultural Rights.
 - International Covenant on Civil and Political Rights.
- The 10 Principles of the United Nations Global Compact.
- United Nations Guiding Principles on Business and Human Rights.
- OECD Guidelines for Multinational Enterprises.
- ILO Declaration on Fundamental Principles and Rights at Work.
- International Labour Organization (ILO) Conventions.
- Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.
- The 17 Sustainable Development Goals, focusing on Goals 4, 5, 8, 10, 13, 16 and 17.
- Convention for the Protection of Human Rights and Fundamental Freedoms.
- European Union Directive on Corporate Sustainability Due Diligence (CSDDD).
- European Union Directive on Corporate Sustainability Disclosure (CSDR).
- European Union Regulation on Artificial Intelligence.

4.2 Local regulations and guidelines

- UK Modern Slavery Act 2015.
- Spain's National Plan on Business and Human Rights.
- Belgian Act of 28 November 2022 on corporate due diligence in relation to human rights and the environment.
- Act No. 2017-399 on the duty of supervision of parent companies and contractors in France.

4.3 Internal company policies

- NTT Group Human Rights Policy.
- NTT Group Charter of Human Rights.
- NTT DATA Group Guidelines for Sustainability in the Supply Chain.
- NTT DATA Group Code of Business Ethics.
- **NTT DATA Spain S.L.U.** Sustainability Policy.
- **NTT DATA Europe & Latam** Diversity and Inclusion Policy
- **NTT DATA Europe & Latam** Data Protection Policy.
- **NTT DATA Spain S.L.U.** Supplier Risk Management Policy.

The Regional Unit undertakes to respect international human rights principles where there is a conflict between internationally recognised human rights and the laws and regulations of countries and territories.

5. Commitments in our key areas of human rights

The Regional Unit is committed to ensuring that our business activities do not cause or exacerbate any adverse impact on human rights. Our company recognises that the following areas of human rights are the most significant for our operations and, therefore, a priority for the business.

5.1 Prohibition of discrimination

We will respect diverse values and cultures and will not discriminate on the grounds of race, nationality, ethnicity, place of origin, class, religion, belief, language, culture, sex, sexual orientation, gender identity, age, disability, illness, appearance or any other characteristic that distinguishes human beings. We will also address the specific challenges facing each country and region through our business activities.

We firmly reject any use of language that promotes discrimination, violates human rights, constitutes harassment or an abuse of authority in any form, or any other misleading language in the presentation and advertising of the services we provide. Should such expressions be used, we will respond to them appropriately.

5.2 Prohibition of forced labour, child labour or any other form of modern slavery and discrimination

We prohibit all forms of forced and compulsory labour, human trafficking and child labour, and we strive to rectify or eradicate labour practices that violate human rights.

5.3 Freedom of association and right to unionise

We respect people's right to join or form a trade union of their choice, take part in trade union activities, participate in peaceful assemblies, engage in collective bargaining, or to refrain from such activities, in accordance with applicable legislation.

5.4 Fair wages

We offer salaries and benefits in line with local regulations. Furthermore, we comply with established regulations, ensuring a fair and recognised level of local pay for our employees.

5.5 Freedom of expression

We respect the right to express all forms of speech and opinion without censorship or regulation. Furthermore, we respond appropriately to evidence of discrimination and human rights violations that undermine public well-being.

As a technology company, we are aware of the negative impact of harmful websites and defamatory content on social media. In this context, when communicating and designing digital solutions for our customers, we will refrain from using expressions, language and statements that are discriminatory, and we will respect human rights.

5.6 Right to use a technology according to high ethical standards and digital accessibility

We will develop new technologies based on high ethical standards, as well as high standards of security and privacy, which include respect for human rights and consideration for the environment; furthermore, we will work to ensure and improve accessibility for older people, children, people with disabilities, people living in poverty and others in socially vulnerable situations, and those affected by the digital divide. We will continue to monitor and respond to the various human rights issues raised by technological development.

5.7 Right to responsible use of data and to data privacy

We will respect privacy and comply with privacy regulations in accordance with the applicable laws, regulations and guidelines of all jurisdictions in which we operate.

We will also process each individual's personal data appropriately and protect their rights and interests thoroughly. We will take appropriate action in response to the improper processing and use

of information that does not comply with customers' wishes; we will increase transparency regarding the use of the data collected; and we will monitor risks even after the services have been provided.

5.8 Right to work in a healthy and safe environment

We promote and maintain a workplace in which professionals can work with energy and in good health –both physically and mentally– to maximise their well-being and that of society. To achieve this, we believe it is important to create a safe and secure workplace and to promote a variety of working styles that cater for different preferences and life circumstances.

We will also strive to improve our benefits programmes so that employees can lead healthy and fulfilling lives whilst balancing work, social activities and family life with life events (childcare, childbirth, etc.).

5.9 Respect for labour rights

We will respect the human and labour rights recognised in national and international law, and we will comply with international standards in countries where human rights legislation is not sufficiently developed.

5.10 Promoting a culture of respect for human rights

We will raise awareness amongst all our staff of the importance of protecting human rights in our operations and throughout the value chain. Employees will receive ongoing training on human rights issues to improve their understanding of the subject. In addition, **the Regional Unit** also publishes annual sustainability reports, covering human rights issues, to enable ongoing assessment and improvement. We will uphold the human and labour rights recognised in national and international legislation, and we will comply with international standards in countries where human rights legislation is not yet sufficiently developed.



6. Risk prevention

In carrying out its work, the Regional Unit endeavours to avoid causing a negative impact on human rights. It will carry out human rights due diligence to identify, prevent, mitigate and remedy human rights issues globally and throughout the value chain.

Given that the human rights landscape is constantly changing, and in light of the global geopolitical landscape, corporate risk assessments are carried out periodically. These assessments include potential risks relating to human rights and they aim to identify and implement measures to prevent and/or mitigate them, where appropriate.

7. Suppliers and due diligence process

In accordance with NTT DATA Group guidelines, **NTT DATA** Spain S.L.U. will manage risks in each **Regional Unit** process through dialogue with experts and other third parties, and will work with all members of the value chain to roll out improvements towards a comprehensive and fair solution. In the event of any alleged human rights violations, we will consider terminating the contractual relationship with those third parties.

Should the existence of forced labour, inhuman treatment, child labour, discrimination or wages below the minimum wage be detected as a result of due diligence during the supplier contracting approval process or afterwards during random compliance review processes, NTT DATA will take immediate action, including termination of the relevant contractual relationship in cases involving serious human rights violations. In addition to this policy, compliance with the [Code of Business Conduct NTT DATA IBIOL](#) must be considered.

8. Internal governance

Human rights management at **NTT DATA Spain** S.L.U. is governed jointly and collaboratively by the following departments: People, People Compliance, Labour, Diversity, Equity and Inclusion, Legal, Corporate Sustainability, Procurement, and Compliance & Risk Management. These areas act as a collective body responsible for monitoring and protecting human rights within the organisation.

The main shared functions of these areas are:

- ✓ Define out how to prevent and avoid human rights risks, including within the value chain.
- ✓ Ensure that any potential human rights violations are duly reported via the global Complaints Channel (SpeakUp).
- ✓ Carry out and oversee human rights due diligence.
- ✓ Design awareness-raising and training initiatives on human rights within the organisation.
- ✓ Incorporate best practice in human rights into the business strategy.

This Human Rights Policy will be reviewed every two years. The Regional Unit will set common overarching objectives for the priority issues to be addressed and will promote their integration into business operations in accordance with NTT Group criteria.

9. Human rights violation reporting system

NTT DATA operates a global Complaints Channel called SpeakUp, which enables all employees and third parties –such as customers and suppliers– who interact with the organisation in any way to securely and anonymously report potential regulatory and ethical breaches, including those relating to human rights. This channel is governed by the principles of confidentiality, globality and independence, preventing any form of retaliation and ensuring that applicable legislation and ethical standards are upheld at all times, guaranteeing that any alleged human rights violations are dealt with effectively, and promoting a culture of integrity and responsible management within the organisation.

10. Prevention and awareness-raising

We will publish this policy so that all stakeholders are aware of its content. Training initiatives will be carried out to ensure that employees of **NTT DATA Spain S.L.U. and its subsidiaries** fully understand the content of this policy.

All stakeholders falling within the scope of this policy are required to be familiar with it, understand it and comply with it.

We, the management team, endorse and support this policy and will provide the necessary resources for its implementation and monitoring.

Antonio Gómez Jarillo

Secretary of the Board of Directors of NTT DATA Spain and NTT DATA Europe & Latam, and IBIOL Compliance & Risk Management Head CRO



Miguel Teixeira

CEO of NTT DATA Spain, holding company of the IBIOL Unit



Register of modifications			
Version no.	Person responsible for approval	Approved by	Date of approval
1.0	Antonio Gómez Jarillo	General Council for Europe & Latin America CRO and Secretary of the Board of Directors	24/09/2024
2.0	Miguel Teixeira	CEO Iberia, International Organizations, LATAM & Consulting Benelux & France	01/06/2026

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