# NTT DATA Code of Business Ethics



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# CEO Message and Statement of Ethics



**Dear NTT DATA Colleagues,**

The world around us is undergoing significant change, driven in part by the evolution of AI. Under these circumstances, we must continue to create new value for our clients as their most trusted transformation partner. This trust is rooted in the confidence our clients and society place in us, earned through compliance with laws and regulations, a steadfast commitment to the highest ethical standards, and the choices and actions we take every day.

The Code of Business Ethics sets forth guiding principles that we can rely on when making challenging decisions in our day-to-day work. As the environment around us becomes more complex, we will face more situations that require individual judgment. In such cases, we must not only comply with laws and internal regulations but also make decisions that reflect the intent of those rules and the expectations of society. As a global company, we must adapt to diverse environments while consistently upholding our fundamental principles of ethics and compliance.

An open and candid organizational culture is essential for effective compliance. When questions or concerns arise in the course of our work, we must speak up, seek guidance, and act promptly. Speaking up helps protect our people, our clients, and our organization, and it is our responsibility to maintain a culture where employees feel safe to raise concerns.

Our 200,000 employees worldwide are the driving force behind NTT DATA Group's growth. Creating an environment where everyone can grow and take on new challenges maximizes the value we deliver to our clients. Let us bring our Mission to life by embracing our four Values and nurturing the Culture of "Be the place where people grow."

With compliance as our foundation for value creation, we will continue to be a company that is trusted and chosen by society. By living the principles of this Code of Business Ethics, each of us plays a part in building a company where we can take genuine pride in our work.

**Kazuhiko Nakayama**
Representative Director, President and CEO,
NTT DATA Group Corporation



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# Mission and Values

**NTT DATA Code of Business Ethics is one of the key guiding principles along with our Mission, Values and Culture.**

## Mission

Accelerate client success and positively impact society through responsible innovation.

## Values

**Respect every voice.** We grow by listening. We invite different viewpoints, honor every background and encourage sharing perspective 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.

## Culture

Be the place where people grow.

## Code of Business Ethics

Our guideline that defines how NTT DATA and our people are expected to conduct themselves — ethically, legally, and with respect for people and society.



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# Terms that we use in Our Code of Business Ethics

**the Code, our Code**

Refers to this Code of Business Ethics.

**Our People**

Employees (full time, part- time, fixed term or temporary), directors and officers of each operating company within NTT DATA.

**Business Partners**

Clients, consultants, contractors, independent contractors, contingent workers, agents, suppliers, distributors, intermediaries, vendors, third-party labor providers and all other third parties.

**Clients**

Companies or public organizations we contract with and to whom we provide goods and services.

**NTT DATA**

Means NTT DATA GROUP CORPORATION and its consolidated subsidiaries.

**Public Sector Official(s)**

A Public Sector Official is anyone who:

- Acts for or on behalf of a government authority or political party, or an official thereof
- Is a candidate for political office
- Works for a local, state, provincial or national government
- Works for a public international organization
- Works for an entity owned, controlled or funded by the government, such as a school, hospital or public broadcast company
- Is a member of a royal family.

**Values**

The NTT DATA corporate values.



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# 1. About Our Code of Business Ethics (“the Code”)

## About Our Code:


1.1 Purpose of the Code

1.2 Who the Code Applies to

1.3 How to use Our Code and be an Advocate for Ethics in Our Business


NTT DATA embraces a culture of growth, responsible conduct and doing the right thing. Our Code of Business Ethics is our guideline for expected ethical behavior and decision-making for our way of doing business. We are all responsible for enabling and living a culture of respect, innovation, integrity and collaboration. We do this by following our Code, complying with laws, regulations and company policies.



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## 1.1 Purpose of the Code

Our goal is to embed the highest standards of ethics in our business so that we can be trusted as an ethical, sustainable, global business partner by both Our People and our Business Partners.

## 1.2 Who the Code Applies to

**The Code is endorsed by the Board of Directors of NTT DATA GROUP CORPORATION and applies to our People as well as our (direct and indirect) subsidiaries.**

We hold all of our People accountable for complying with our Code, our policies and our Values. By following our Code and living out NTT DATA's Values, we embed our culture. In addition, each of our subsidiaries is tasked with sharing and entrenching the message of responsible business conduct.

Our Values guide all of our relationships, internally and externally, and help us make the right decisions when we are faced with confusing or ambiguous situations.

We contract and align ourselves with ethical stakeholders and with Business Partners whose values and ethics are consistent with our own. The conduct of our Business Partners can also affect our company, so we expect our Business Partners, as well as all of our affiliated companies and shareholders, to uphold the principles and values in our Code when working with us or on our behalf.

As a global company, we follow international standards and we follow applicable laws. Given that many different laws and regulations apply in the many different countries in which we operate, our Code is supported by and supplemented with policies which address local business requirements, laws and regulations. We do what is right, even if that means doing more than is required by our policies and laws, in order to act with integrity and treat each other with respect.

## 1.3. How to use our Code and be an Advocate for Ethics in our Business

**Actions that contravene the principles of our Code, our policies or the law can have severe consequences for our business, including fines, financial loss and damage to our reputation. It is therefore important that all our People are aware of the content of and principles in our Code.**

We encourage our People to be advocates for our Code and we guide them on how to make sound, ethical decisions that affect our business.

→ Guide to Ethical Decision-Making

### Play your part

- Know, follow and advocate for our Code, our policies, and the laws and regulations that apply to your role at NTT DATA.
- Understand the expected behaviors when dealing with our People, our Business Partners, our Company and our communities.
- Communicate and reinforce positive messaging about our company Values, responsible corporate conduct and our Code.
- Complete annual compliance training, and actively support and encourage our ethics and compliance training and awareness programs.
- Source Business Partners whose values and ethics are consistent with our own.
- Act as a role model, and lead the right behaviours in our teams. Encourage our teams to speak up openly, without fear of retaliation.
- Refer to the Code or ask questions when unsure of the right decision or action, and contact your manager or compliance department for assistance.
- Speak up when you observe anything that goes against our Code, and encourage others to do the same.



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# 2. Creating a Safe, Inclusive and Respectful Working Environment

## We are committed to:


2.1 Respecting Human Rights

2.2 Preventing Modern Slavery, Human Trafficking, and Forced and Child Labor

2.3 Maintaining Workplace Safety

2.4 Rejecting All Forms of Harassment

2.5 Promoting Diversity and Inclusion

2.6 Creating an Equal and Discrimination-Free Workplace


At NTT DATA, we respect human rights, we treat Our People and Business Partners with respect and dignity, we follow objective and fair processes, and we make decisions with a clear business rationale.



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## 2.1 Respecting Human Rights

### We respect and protect human rights and dignity in our Business, wherever we operate.

We strive to identify, prevent, mitigate, and account for how we address adverse human rights impacts across our operations and value chain. We act diligently to help remediate any impacts that may occur.

We also respect workers' rights, and in particular the right of Our People, as workers, to form and join trade unions of their choice and to bargain collectively.

→ NTT Group Human Rights Policy

## 2.2 Preventing Modern Slavery, Human Trafficking, and Forced and Child Labor

### We reject all forms of modern slavery, human trafficking, and forced and child labor.

As a company with a workforce in different jurisdictions that supports Clients in different industries, we carefully assess who we conduct business with, and we take a clear stand against modern slavery, human trafficking, and forced and child labor. We expect our supply chain to meet and uphold the benchmark that we set.

## 2.3 Maintaining Workplace Safety

### We are committed to creating a safe and secure workplace where Our People are safe, motivated and energized.

We are committed to upholding the physical and mental safety of all of our employees.

We ensure safe working conditions by minimizing the exposure of Our People to health risks and hazards through the adoption of safety procedures, where relevant.

Our People respect each other by refraining from any form of physical or verbal violence or obstructive or intimidating behavior.

We respect the psychological safety of Our People and promote a culture of workplace professionalism, respect and inclusion.

In turn, we expect Our People to ensure that their work performance is not impaired by alcohol, drugs or medication. The possession or use of illegal substances or firearms on any business premises, including those of our Business Partners, is strictly prohibited.





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## 2.4 Rejecting All Forms of Harassment

**We strive to maintain a respectful, professional working environment that is free from any form of violence or harassment, which includes intimidation and bullying behavior.**

We encourage Our People to be mindful of their behavior and not to verbally, physically or psychologically mistreat or offend others. Such behavior, whether by Our People or Business Partners, will not be tolerated.

## 2.5 Promoting Diversity and Inclusion

**NTT DATA is a multicultural business, and we welcome and support Our People and Business Partners with different abilities and backgrounds.**

Our diverse and inclusive workforce gives us an advantage, as we are able to tap into each person's individual experience, talent and background. We respect every voice. We invite different viewpoints, honor every background, and encourage sharing perspectives. By fostering an inclusive workplace, we are proud to advocate for an unprejudiced and progressive global community.

## 2.6 Creating an Equal and Discrimination-Free Workplace

**We are committed to creating a respectful and fair work environment where Our People can participate and collaborate based on professional merit, regardless of their personal beliefs, perspectives or backgrounds.**

We treat all Our People and Business Partners fairly. All of our appointments and business decisions are made with clear business merit. We provide equal opportunities, free of bias or nepotism, and ensure fair treatment in our recruitment, remuneration and people practices.



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# 3. Conducting Business in a Way That is Fair and Ethical

## We are committed to:


3.1 Standing Against Bribery and Corruption

3.2 Conducting Responsible Trade

3.3 Maintaining an Ethical and Sustainable Supply Chain

3.4 Competing Fairly

3.5 Responsible and Ethical Design and Use of Technology

3.6 Avoiding Conflicts of Interest

3.7 Communicating Responsibly

3.8 Safeguarding Confidential Information

3.9 Protecting Intellectual Property


Our partnerships reflect a strong commitment to ethics, transparency and sustainable practices. We act as responsible partners, and we always operate from a position of business ethics and integrity. We hold our Business Partners accountable to the same standards, and ensure that all business outcomes are responsible, lawful and ethical.



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# 3.1. Standing Against Bribery and Corruption

## We reject all forms of corruption, and we take steps to avoid any implication of corruption.

Corruption damages our business reputation, harms relationships and erodes the trust of Our People and Business Partners. We therefore conduct business on merit only and in accordance with sound business principles.

We never offer or accept any bribe, kickback or facilitation payment (in any form, whether direct, indirect or concealed), even if local customs encourage it.

We do not accept, offer or promise any benefits, gifts, entertainment or other amenities to obtain an improper business advantage, and we take particular care in the Public Sector when dealing with Public Sector Officials. Our People must bear this in mind when offering or accepting gifts or invitations and must offer and accept such invitations responsibly, in line with our policies and always considering NTT DATA's reputation.

We may be held liable for bribery or the corrupt practices of a Business Partner who acts on our behalf, regardless of our knowledge of any such unlawful practices. Therefore, it is important that we thoroughly vet and monitor these relationships, and manage them appropriately. We do not allow Business Partners who act on our behalf to make any payments or offers of value, and we take appropriate caution to ensure that no such payments occur without our consent or knowledge.

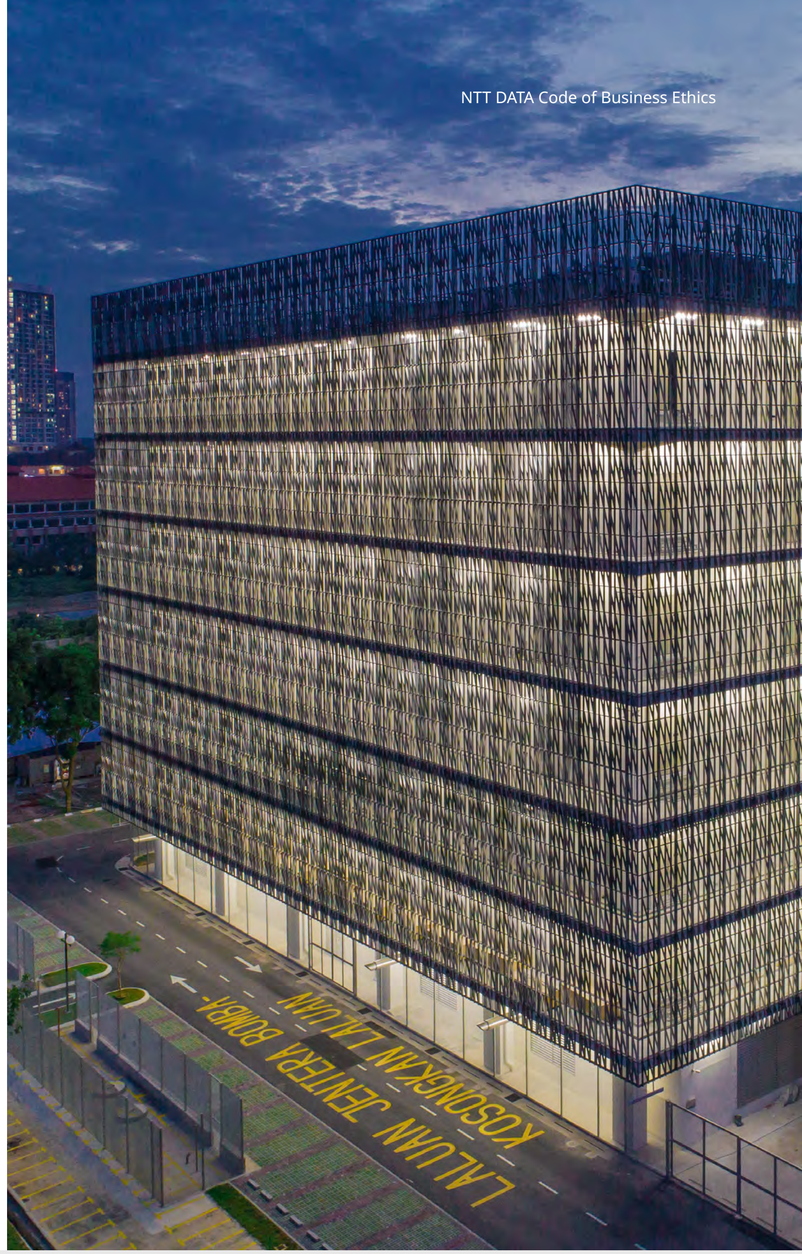
### Definitions

**What is a bribe?**
A bribe is a direct or indirect offer or receipt of any advantage or something of value to influence or bring about a particular action, decision or behavior (including not making a decision or taking action) and/or to secure an improper advantage. Bribes can be offered in both private-sector and public-sector engagements. The mere offer of a bribe can create a risk of liability, even if nothing of value ever changes hands.

**What is something of value?**
"Something of value" is a broad term that includes (but is not limited to) gifts, money, promises, meals, personal services, repeated gifts of smaller value, business opportunities, investment or employment opportunities, and other incentives.

**What is a kickback?**
A kickback is an illegal or unauthorized payment made to a party in return for that party securing preferential treatment, services or agreements.

**What is a facilitation payment?**
Facilitation payments are payments to foreign or Public Sector Officials to speed up or ensure the performance of routine actions or services the official is already obligated to perform, such as issuing visas, work permits or licenses.






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# 3.1. Standing Against Bribery and Corruption

## Assess whether gifts and hospitality are appropriate

In some cases, there may be a legitimate business purpose for the gift. Consider the following questions before offering or accepting a gift or benefit, and consult your compliance department if you are still not sure:

| | | | | | |
|---|---|---|---|---|---|
| Would the gift or hospitality embarrass NTT DATA if it were made public? | Does the gift or hospitality influence, or seem to be able to influence, a business decision in relation to the recipient? | Is there a risk of inflated payments or kickbacks? | Is the gift so expensive or extravagant that it would make the recipient feel uncomfortable or obliged to reciprocate in some way? | Are gifts received frequently from a particular Business Partner, and would this be seen to be inappropriate over a period of time? | Is the gift or hospitality given to the Business Partner at a time when the Business Partner is making a decision in relation to NTT DATA or in relation to an open tender? |

If you answer “Yes” to any of these questions, then do not proceed. Consult your compliance department.

If you answer “No” to all of these questions, then you may proceed in accordance with the requirements of relevant policies.



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# 3.2. Conducting Responsible Trade

**NTT DATA is actively involved in the global trade of goods and services. In many countries and regions where we operate, export and import laws and regulations apply, including those related to sanctions, terrorist lists and blocked lists, embargoes and other resale restrictions.**

We adhere to all relevant international trade regulations and the applicable laws of each country when we import and export. When we import or export, we obtain all the necessary licenses and permits, and we keep accurate and complete records of all transactions. We thoroughly evaluate all business relationships and transactions (including financial transactions) to ensure compliance.

Effective compliance not only mitigates the risk of legal penalties but also enhances NTT DATA's reputation as a trustworthy and reliable trading partner. By adhering to these compliance practices, we aim to build trust with our Business Partners and stakeholders and ensure the smooth and lawful operation of our global business engagements.

## Assess international transactions

Early on in any engagement with any Business Partner, carefully consider whether the engagement entails any sanctioned entity, international financial transaction, or the provision of services, products (or software) or technical information across borders.

## Be vigilant in relation to boycott requests

**Do not cooperate with any boycott without consulting your compliance department.**

Boycott activity can take the form of refusals to do business with certain groups (a person, company, product, organization, country or government), or requests for information about boycotted entities. Be alert to these situations, as these requests may be illegal, and there may be prohibitions on such activities contained in documents such as master service agreements, invoices or statements of work.





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# 3.3. Maintaining an Ethical and Sustainable Supply Chain

## We strive to collaborate and build mutual trust with our Business Partners.

We thoroughly assess new suppliers and contractors in our supply chain to mitigate any continuity or other business risks that may impact our service delivery to our Clients.

We source fairly and responsibly from trusted suppliers and contractors, and we are committed to fair procurement based on competitive pricing, quality, technology and delivery.

Maintaining relationships with criminals, terrorists and other antisocial forces that threaten social order and security through criminal acts such as violence, force, fraud, trafficking of illegal drugs, and terrorism, can undermine trust in NTT DATA and put us at risk. Antisocial forces may also attempt to use sophisticated business transactions involving NTT DATA to launder illegally obtained funds.

Knowing our Business Partners helps us comply with various laws and reduces risks of bribery, fraud and/or money laundering as well as the risks associated with cyberattacks and data breaches. We therefore conduct a thorough due diligence assessment before onboarding a new Business Partner and ongoing due diligence thereafter, using a risk-based approach. We also monitor financial transactions within our influence to detect and prevent money laundering and eliminate engagements with antisocial forces.

Together with our Business Partners, we strive to address corrupt human rights, labor and environmental practices in both our business and our supply chain. By evaluating the impact on society of the products and services we procure and the solutions we provide, we can contribute to a better society and build a responsible supply chain.

### Know who we are doing business with

- Conduct due diligence in relation to all Business Partners and, where applicable, Clients, to make sure we know who we are doing business with and that all Business Partners follow the law and are committed to ethical business practices.
- Base all decisions on objective commercial or economic criteria such as price, availability, the ability to provide goods or services, and quality.
- Using a risk-based approach, consider all risks associated with doing business with that Business Partner (for example, commercial risks, environmental risks and risks associated with specific laws applicable to that Business Partner).
- Consider whether the Business Partner aligns with our Code and Values.
- Avoid even the appearance of a conflict of interest when engaging with a Business Partner.

## Seek to understand our Business Partners through open, honest communication, especially if issues arise.

### Definitions

**What is fraud?**
Fraud is the deliberate, intentional and dishonest use of deception to obtain an unjust or illegal gain, or cause loss or risk of loss (usually financial loss) to another. Fraudulent acts include forgery of documents, knowingly providing false information, misappropriation of funds, suppliers or assets, and improper reporting of money or financial transactions.

**What is money laundering?**
Money laundering occurs when money that is obtained through illegal activities is converted to a legitimate source in an attempt to disguise the illegal origin of the funds.

**What is terrorism financing?**
Terrorism financing occurs when money or other resources are made available to commit criminal acts of terrorism or to support terrorist organizations.



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# 3.4. Competing Fairly

**We are committed to following the rules of fair competition, and we do not look for unfair advantages. We compete vigorously, fairly and transparently.**

A free and fair market benefits Clients and the market, and ensures access to the highest quality products and services at the best prices. This is why there are laws which regulate how we engage with competitors in our market.

These laws apply in most countries where we operate. They prohibit collusive, unfair or anticompetitive business behavior that restricts free competition.

We are extremely cautious when communicating with our competitors. To avoid anticompetitive arrangements or the suspicion of such arrangements, we usually do not exchange sensitive information with our competitors (such as information relating to price and cost).

We do not partner with any company for a bid if such a partnership could harm competition or result in actual or suspected anticompetitive arrangements, such as collusive tendering or bid rigging. If we do partner with another company for a bid, we share only the information that is strictly necessary for our joint participation in the bid, and only once a partnership agreement is in place.

## Understand anticompetitive practices

Anticompetitive practices are ways of limiting competition or seeking an unfair advantage in the marketplace. These practices are illegal, and they undermine the principles of fair trade.

**Examples include:**

- **Price fixing:** Competitors agree to use the same price so that clients cannot seek out the best value.
- **Market dominance:** Unfairly disadvantaging a Business Partner by using a dominant position to influence pricing, control the supply chain or create conditional obligations in the sale of products and services.
- **Market allocation or market division:** Competitors divide territories and agree to stay in their own territory, thereby reducing client choice.
- **Group boycott:** Two or more competitors refuse to do business with a specific person or company.
- **Cartel:** An agreement between competing firms to coordinate their actions to control the market, set prices, limit production or divide markets. This reduces competition and harms consumers.



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# 3.5. Responsible and Ethical Design and Use of Technology

**We research, source and develop ethical technology with the aim of benefiting our Clients and society as a whole.**

NTT DATA engages in a variety of research and development activities, as we believe in constant innovation.

The new technologies that are created through research and development activities aim to embrace the interdependence between humans, communities and nature, and enable us to build trust with our Clients and Our People. However, these new technologies must also mitigate the risk of misuse, unethical outcomes, potential biases, inaccuracy, information security breaches and data breaches.

We are careful to consider the impacts of new technologies on people and the environment. We do not support technology that works against human interests or the law.

This is why we believe it is necessary to deepen our understanding of the characteristics of new technologies (including AI), constantly explore them, and pursue thorough research and responsible development activities before introducing them into society.

We evaluate whether new technology supports high ethical standards such as respect for human rights, fairness, inclusion, reliability, transparency and consideration for the environment.

### Conduct risk assessments when introducing new technology

If you want to introduce new technology that involves generative AI technologies, the required risk assessments must always be completed first.





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# 3.6. Avoiding Conflicts of Interest

## We act in NTT DATA's best interests and never allow personal interests to interfere with our work.

An actual or potential conflict of interest occurs when there is activity or a relationship that competes with NTT DATA's interests or obstructs our loyalty or commitment to NTT DATA.

Using good judgment to make the best choices for our business allows us to pursue NTT DATA's goals without divided loyalty.

### Be aware of different types of conflicts in our business

**Conflicts with Business Partners**

We appoint Business Partners based on business merit, following appropriate due diligence assessments to identify any relationships or personal financial benefits between Our People and the Business Partner.

**Conflicts in hiring practices**

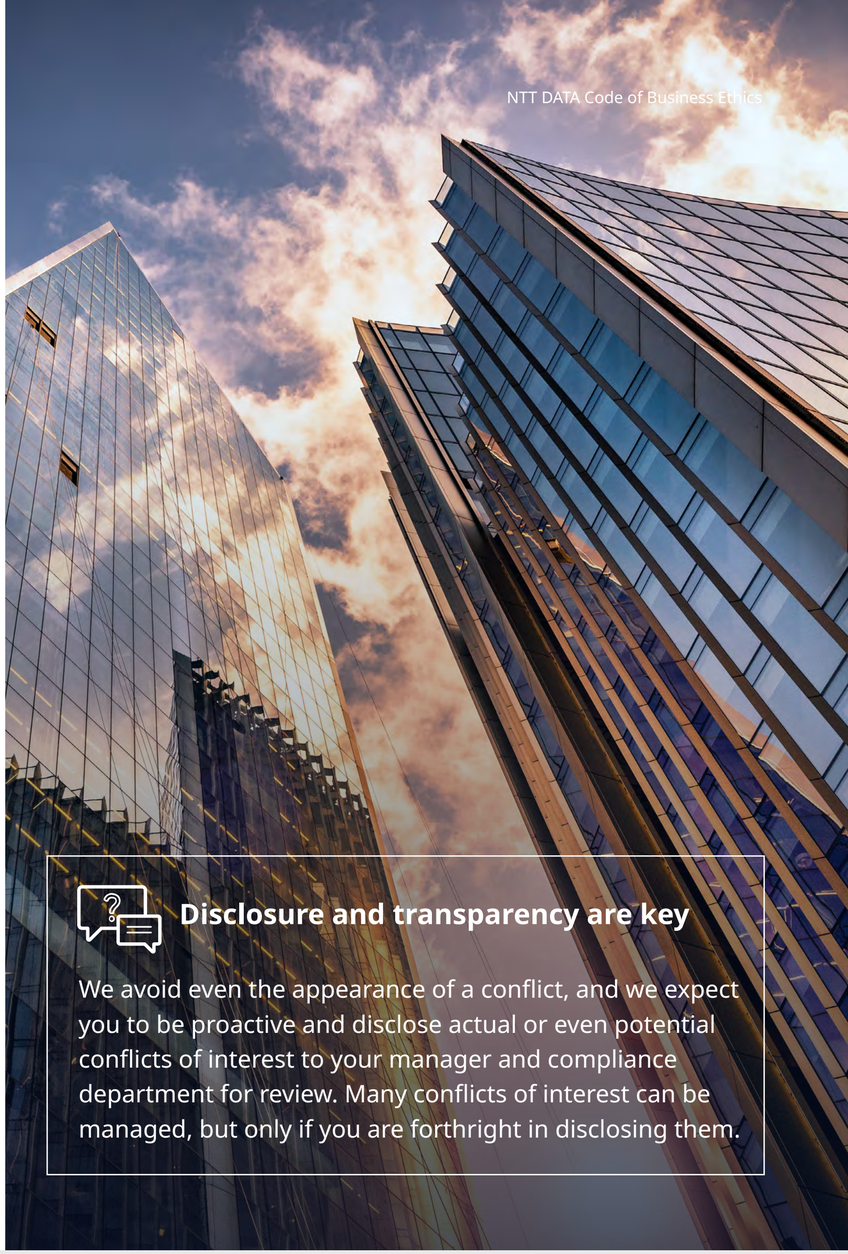
Our hiring practices follow a formal process, and we employ and contract with Our People based on their qualifications, skill, experience and merit, not on personal relationships (friends or family) or nepotism.

**Personal conflicts of Our People**

Our People recognize their duty of care toward NTT DATA and do not take on any personal business activities which compromise that duty of care.

### Avoid conflicts of interest by adhering to the following:

- Do not accept gifts or financial benefits that may affect your loyalty to NTT DATA.
- When you receive information as part of your job, do not trade it for your personal benefit or share it with friends, family or anyone outside the business.
- Information obtained as part of your job must not be taken advantage of after you leave the organization.
- Secondary employment or endeavors must not compete or conflict with NTT DATA business.
- Do not pursue relationships at the office or with Business Partners that may be perceived as inappropriate or that may affect your independent judgment in relation to your role.
- Independent directorships or directorships with other NTT DATA companies or related parties should not influence your independence as an NTT DATA employee or director.
- If considering friends and family in a hiring process, recuse yourself from the decision-making process to ensure independence.



### Disclosure and transparency are key

We avoid even the appearance of a conflict, and we expect you to be proactive and disclose actual or even potential conflicts of interest to your manager and compliance department for review. Many conflicts of interest can be managed, but only if you are forthright in disclosing them.



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# 3.7. Communicating Responsibly

**What we say about NTT DATA can impact our reputation. We therefore strive to provide clear and accurate information. Only designated functions and approved spokespersons are authorized to communicate externally on behalf of NTT DATA. In all external communications, we respect and understand our obligation to protect our confidential information and that of our Business Partners and Our People.**

Social media is a powerful way to build connections and share events, ideas and information. However, social media must be used responsibly. When posting to our personal social media accounts, we are courteous and respectful, and we do not portray our own views as being those of NTT DATA.

Every employee is a reflection of our company and our Values. You must take care in your online activities to not bring NTT DATA into disrepute.

## Definitions

### What is social media?

**Social media** includes social networking sites, blogs, vlogs, online forums, communicating via email and other written forms, and even conversations.

## Ensure your online presence is lawful, respectful and appropriate

**When using social media:**

- Clearly distinguish your own personal views from those of NTT DATA.
- Do not post anything that is or could be perceived to be bullying or harassment.
- Take care not to cause offense. Think before expressing an opinion which could be considered discriminatory or offensive.
- Do not post anything that will break the law or promotes breaking the law.
- Never share NTT DATA's confidential or proprietary information.

Forward outside inquiries from the media or investors to the appropriate communications team. Do not respond yourself.





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# 3.8. Safeguarding Confidential Information

**We ensure that confidential information is used only for the purpose and scope deemed necessary for NTT DATA's business operations and to fulfill our roles and responsibilities.**

Our confidential and proprietary information, as well as information entrusted to us by our Business Partners, is a source of our competitiveness. When sharing and using this information for business reasons, we safeguard all confidential and proprietary information. This information is handled with the utmost care and protected against unauthorized access, disclosure and misuse.

We keep all information relating to our work confidential, and we dispose of it properly. We do not share information inappropriately with third parties or colleagues.

### Be responsible when using company information and equipment

Use only the approved device and official communication channels when handling company information.

Do not use NTT DATA credentials or equipment to subscribe to any websites, services, or other subscriptions for personal use unless explicitly authorized.

### Definitions

**What is confidential information?**
Confidential information refers to all information (including information related to third parties) not in the public domain that is generated or acquired by Our People in the course of our business operations. It is information that NTT DATA wishes to keep private and restrict access to. Confidential information includes personal data and information that we own that gives us a competitive edge, such as information about new products, formulas and discoveries, and financial information.

# 3.9. Protecting Intellectual Property

**We actively protect our intellectual property.**

Our intellectual property is one of NTT DATA's most valuable assets and a source of our competitiveness.

All creations and inventions made by Our People in the course of their employment belong to NTT DATA, to the extent prescribed under relevant policies and applicable laws and regulations.

We preserve and protect the rights of NTT DATA regarding any such creations and inventions. We do not misuse the intellectual property of third parties. We respect valid intellectual property rights belonging to third parties and take necessary measures, such as conducting reasonable investigations, to avoid infringing any such rights (for example, having unauthorized access to, downloading or copying third-party software without a license, or using trademarks of third parties without the owner's written consent).

### Definitions

**What is intellectual property?**
Intellectual property includes copyrights, patents, industrial designs, trademarks and trade secrets, and works to maximize the value of these assets.

**What is a patent?**
**Patents** are exclusive legal rights that apply to any inventions or designs. Do not discuss any NTT DATA inventions, designs or innovations with anyone outside the business, as these may be patentable.

Contact your legal or intellectual property department if you suspect that any inventions, designs or innovations are patentable.



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# 4. Being a Good Corporate Citizen and an Advocate for Sustainability

## We uphold the following principles:


4.1 Implementing Good Corporate Governance

4.2 Responsible Use of and Safeguarding Our Assets

4.3 Complying With Laws

4.4 Contributing to a Sustainable Environment and Society

4.5 Prioritizing Business Resilience


Our business practices align with the principles of good corporate governance, including transparency, independence and accountability. We ensure that we have clear and sound processes in place for Our People and stakeholders, and we ensure that our sustainable initiatives and charitable contributions are bold, innovative, and lead to broader wins for society as a whole.



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# 4.1 Implementing Good Corporate Governance

## Representations

We keep our promises to our Clients and to the communities in which we operate. Therefore, we each have a responsibility to represent NTT DATA and our products, services and solutions accurately in our marketing, advertising, proposals, go-to-market materials and contracts.

## Records

We ensure that all records and reports are accurate, complete, timely and prepared in accordance with applicable rules and standards.

Any information that we record and report, both internally and externally, must be a fair representation of the facts. This includes financial and nonfinancial information.

Timely and accurate records and reports help us make sound business decisions and ensure that we do not mislead the public or investors about NTT DATA's financial position.

## Disclosures and responding to information requests

We are committed to providing complete, fair, accurate, timely and clear disclosures in reports and documents that we create for internal use or Client disclosures, or that we file with or submit to our regulators, or in our other external or public communications.

NTT, Inc. our ultimate parent company, is a public company listed on the Tokyo Stock Exchange. Our shareholders and investors rely on our timely and accurate public disclosures of material corporate information to make investment decisions. We value constructive engagements with such shareholders to maintain a relationship of trust.

## Audit

We cooperate with both internal and external auditors in good faith and in accordance with the law.

We ensure the appointment of external auditors to independently review our records. Audits performed by our internal and external auditors help to ensure compliance with applicable legislation and established policies, procedures and controls, as well as to identify potential weaknesses for prompt remediation.

We must never mislead auditors in any manner regarding financial records, processes, controls, procedures or other matters which they may inquire about.

## Acting with authority

When making a decision for NTT DATA, we will make the best and most appropriate decisions based on necessary information, in accordance with our policies and procedures.

We do not enter into any kind of contract, including verbal commitments binding NTT DATA, sign any document or engage in any other transaction beyond the scope of NTT DATA's decision-making and delegated authority or beyond our own authority that is associated with our role at NTT DATA.



### Ensure records and reports are accurate, substantiated and not misleading

- ✕ **Don't** use financial records to mislead anyone about our business.
- ✕ **Don't** falsify financial records or receipts, or attempt to commit fraud of any kind.
- ✓ **Do** maintain complete and accurate records and supporting documents for any monetary transactions.
- ✓ **Do** follow all policies, internal controls and procedures, and the law when handling financial assets and records.



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# 4.2 Responsible Use and Safeguarding of Our Assets

## We protect our information assets and information systems.

### Information assets

The information assets of NTT DATA are important property that should be used only for legitimate business purposes.

Information assets include information and information systems used in the execution of business activities. Information can be in physical form, for example in printed documents, or in digital form, for example, images, videos, audio files, databases and websites.

NTT DATA is the legal owner and custodian of the information you work on, create or contribute to during your time with the company. NTT DATA assets must not be used to engage in activities that may violate our policies, regulations or applicable laws.

We protect our assets from any types of loss, misuse or counterfeiting. It is crucial to prevent sensitive company information from falling into the hands of unauthorized persons or third parties. The appropriate use of and protection of our assets is the key to maintaining trust with all of our stakeholders and to supporting vital infrastructure for society.

### Physical assets (including NTT DATA money and cash)

Our equipment and assets are important property that enable Our People to perform at their best. We do not use NTT DATA assets for individual profit or for any unlawful, unauthorized personal or unethical purposes. Our facilities, equipment, machines, software, and cash and money may be used for business purposes only. This includes responsible and accurate expense reimbursement processes.





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# 4.3. Complying With Laws

**We comply with applicable laws and regulations in the countries and regions where we do business. We respect international standards and act in a highly ethical manner, in accordance with the social responsibility expected of a global company.**

Where local laws, regulations, applicable industry codes or business-specific standards are stricter than our Code, or prohibit any activities outlined in our Code, we comply with the relevant laws and regulations. However, if local business practice (that is, norms and customs, not legal requirements) conflicts with our Code, we follow our Code to ensure that we are conducting ourselves in an ethical way.

We are all expected to comply with both the letter and the spirit of our Code and the laws and regulations that apply to our business.

## Tax compliance

**We adhere to applicable tax laws and regulations wherever we conduct business, including rules and guidance regarding international taxation.**

To mitigate tax risks, we maintain and enhance our tax-compliance processes and controls. We manage tax burdens through lawful approaches.

## Privacy

**We respect individuals' privacy and protect their personal data.**

Our People and Business Partners trust us to use their personal data responsibly. We therefore take the utmost care to ensure that all personal data is processed lawfully, fairly, ethically and transparently.

To safeguard personal data, we follow data protection laws, company policies and processes (including technical measures) and data-processing agreements when we collect, maintain, use, transfer, provide, disclose or dispose of personal data.

### Take care when handling sensitive and personal data

- ✓ **Do** always protect sensitive data, particularly Client information and employee data.
- ✓ **Do** always handle, store, and transmit personal or confidential information with utmost care and responsibility.





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# 4.3. Complying With Laws

## Insider trading

**We do not transact, or recommend transactions to others, based on insider information.**

In the course of doing business, Our People may come across information about NTT DATA or other listed companies that has not yet been publicly disclosed. Using that information to trade in shares or securities is prohibited in many countries because it impairs the fairness and soundness of the stock market.

If we become aware of insider information about NTT DATA or other companies, we will not trade in the shares or securities of the company until such information is made public. We also do not trade insider information for our personal benefit, or communicate insider information to others, including family members and business or social acquaintances.

**Examples of insider information:**

- A pending earnings report, particularly if its results are unexpected
- The upcoming purchase or sale of a major asset
- Forecasts and fluctuations of future earnings or losses of a company
- Progress toward revenue and revenue goals
- Information regarding mergers, acquisitions or tender offers under consideration
- New products or services
- A planned stock repurchase or split
- The resignation of an executive
- An event that has a material impact on a company's financial situation

### Definitions

**What is insider information?**
**Insider information** is unpublished material information relating to listed companies.

**What is material information?**
**Material information** is information that is likely to affect a company's share price and/or the investment decisions of shareholders.

### Be careful not to exchange insider information

If you are unsure about whether the information you have is material or constitutes insider information, contact your legal department before you disclose this information and/or buy or sell shares.



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# 4.4 Contributing to a Sustainable Environment and Society

## Protecting the global environment

**We endeavor to protect the environment through our corporate and business activities. We comply with all applicable environmental laws and regulations.**

We are committed to a net-zero target in our offices, data centers and our supply chain. We are striving to implement the latest technologies to reach this target.

We use technology and innovation to address climate change, circularity and the regeneration of natural resources, including water resources. We work with various stakeholders to contribute to a sustainable environment.

## Ethical donations and charitable contributions

**All charitable contributions and donations are made transparently and for appropriate reasons that are aligned to our corporate social responsibility and sustainability initiatives.**

Charitable contributions and donations are an important part of NTT DATA's corporate social responsibility, particularly in the areas of education and research, social welfare and disaster relief.

Any amounts contributed or donations made to charitable causes must be fairly and accurately reflected in our books of accounts.

We also encourage Our People to be actively involved in local communities through volunteer activities.

## Sponsorships and memberships

Sponsorships and memberships should be made with transparency and should be made for a legitimate and defined business purpose.

## Political donations and contributions

NTT DATA does not, in principle, make political contributions or support political campaigns for any political candidate. If we do make such political contributions or support, we ensure that there is an appropriate purpose for such contribution, we ensure adequate transparency, and we always act in compliance with applicable laws and regulations. This does not prevent employees from making political contributions or charitable donations privately.

# 4.5 Prioritizing Business Resilience

## We aim to safeguard business continuity, protect our stakeholders and contribute to a resilient global community.

We are committed to identifying and mitigating any destabilizing risks to our business and ensuring that critical functions continue during any such disruptions. Strengthening our supply chain to handle disruptions is a primary concern, and we prioritize restoring our essential systems and data quickly.



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# 4.4 Contributing to a Sustainable Environment and Society

## Consider the following before making a corporate charitable contribution or donation:

These principles also apply to sponsorships and memberships.

| | | | | |
|---|---|---|---|---|
| Have you consulted with your compliance department? | Has the recipient been properly vetted to assess bribery and corruption risks, and reputational risks? | Are the contributions permissible under applicable local laws? | Are contributions made without demand or expectation of reciprocity? | Is the contribution in line with NTT DATA's business, advertising and sustainability strategies? |

If you answer "Yes" to all of these questions, then it is safe to proceed in accordance with the relevant policy.

If you answer "No" to any of these questions, do not proceed. Consult your compliance department.

If there are any questions or concerns that the beneficiaries of such contributions are directly or indirectly related to any employee of NTT DATA, including directors and executive officers, consult your compliance department.





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# 5. Your Role in Maintaining Our Standards of Business Ethics

**We uphold the following principles:**


5.1 Ethical Decision-Making

5.2 Speaking Up




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# 5.1 Ethical Decision-Making

## Use these questions to guide your decisions or actions:

| | | | | | | |
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| Is this decision or action lawful and in line with regulations? | Is this decision or action consistent with our policies and Code of Business Ethics? | Have I disclosed and obtained the necessary approval if I have a personal interest in a decision? | Would this action be acceptable if it were reported in the news or made known publicly? | Is this decision or action in the best interests of NTT DATA? | Is this decision or action in line with our values? | Do I feel comfortable, and not pressured by a manager, in making this decision or taking this action? |

If you answer “Yes” to all of these questions, then you may proceed with the decision or action.

If you answer “No” to any of these questions, do not proceed. Consult your compliance department.



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# 5.2. Speaking Up

**We want Our People (and Business Partners) to feel safe to speak up and to report any suspected misconduct or any compliance or ethical concern, even though this may not be easy.**

We expect Our People to help protect our organization and report any suspected misconduct or any compliance concern relating to our Code, internal policies or any laws and regulations.

While not always easy to do, speaking up about ethical or compliance violations in our business or by our Business Partners is important to support an ethical and accountable work environment. If we think that someone has engaged in misconduct or any potential illegality, we have a responsibility to report this promptly so that it can be investigated and, if necessary, remediated.

One of our core values is that we respect every voice and encourage sharing perspectives.

If you speak up, you will be treated fairly. You will be protected against all forms of retaliation when you make a report in good faith or if you are required to participate in an investigation.

We keep all details of investigations confidential, to the extent allowable by law.

We only share information when it is necessary to do so in order to properly investigate, provide remediation, or as required by law.

## What to report

- Any action or situation that is in conflict with our Code, our Values or company policies
- Any situation which may result in the breach of any laws or regulations
- Any unfair, discriminatory or unethical conduct aimed at Our People or Business Partners
- Retaliatory conduct in response to a report made on our reporting channels
- Any other conduct that seriously impairs the honor or reputation of NTT DATA

## What not to report

- IT or technical queries
- Questions about internal processes or information
- Human resources grievances — these should always be reported to your human resources business partner

## Where to report

Use our 24x7 anonymous and confidential SpeakUp line to report any compliance or ethical concerns in your own language.

Online
https://ntt.speakup.report/NTTDATA

Via our SpeakUp App

Over the phone by dialing your country-specific number



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# 6. Compliance, Monitoring and Review

**We embed our Code into our business by addressing the following:**


6.1 Response to Noncompliance

6.2 Training

6.3 Acknowledgement of Our Code

6.4 Audit, Compliance and Review




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# 6. Compliance, Monitoring and Review

## 6.1 Response to Noncompliance

Failure to comply with our Code, our policies and any applicable legal and regulatory requirements may result in disciplinary action and/or any action permitted under law, up to and including dismissal.

We have established processes to ensure that all potential or suspected legal or Code violations are investigated objectively and with fairness and respect. You can report any such violations to the relevant whistleblowing line.

## 6.2 Training

All of Our People must be aware of, understand and follow our Code. Our People will be expected to complete annual mandatory training on our Code, which includes an attestation of our Code as well as an assessment of understanding of the Code.

## 6.3 Acknowledgement of Our Code

All of Our People are required to acknowledge that they have read and understood the Code. This acknowledgement forms part of our annual training program. Failure to read or acknowledge our Code does not exempt Our People from our responsibility to follow the Code.

## 6.4 Audit, Compliance and Review

Compliance with our Code and policies and upholding NTT DATA's values is monitored on a periodic basis and reported to the relevant NTT DATA governance committees and senior management.

Our Code was approved by the Board of Directors of NTT DATA Group Corporation on 16 June 2025.

Last review date: 1 October 2026





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# A quick guide to some relevant compliance topics covered in our Code

| | |
|---|---|
| Anti–bribery and corruption | 3.1 |
| Anticompetitive business practices; antitrust | 3.4 |
| Anti-money laundering, terrorist financing | 3.1; 3.3 |
| Antisocial forces | 3.3 |
| Donations and contributions | 4.4 |
| Environment and sustainability | 4.4 |
| Facilitation payments and kickbacks | 3.1 |
| Financial records and books of account | 4.1 |
| Fraud, accurate reporting and records; accurate information | 4.1 |
| Gifts and hospitality; benefits | 3.1 |
| Human rights | 2.1 - 2.6 |
| Information security | 4.2 |
| Intimidation, bullying, harassment | 2.3, 2.4 |
| Inventions | 3.9 |
| Nepotism or conflicts of interest; friends and family | 2.6; 3.6 |
| Outside directorships | 3.6 |
| Related parties | 3.6 |
| Third-party risk management and transacting with third parties | 3.3 |
| Trade compliance, export control and import regulations; antiboycott laws | 3.2 |
| Trademarks and patents | 3.9 |
| Trading in company shares; insider trading | 4.3 |
| Use of company assets | 4.2 |
| Violence | 2.3, 2.4 |



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