

NTT DATA North America Modern Slavery & Human Trafficking Statement FY24

November 19, 2025| Document Version 1.0

NTT DATA, Inc.

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1. Introduction

NTT DATA, Inc. has a zero-tolerance approach to modern slavery and human trafficking, and all forms of corruption and bribery associated with these criminal acts. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and adequate controls aimed at preventing any form of modern slavery within our business and our supply chain.

We maintain a long-standing commitment to respecting human rights, including the elimination of slavery and human trafficking in our supply chain and business operations. We welcome the transparency that the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 and Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 encourages.

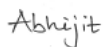
NTT DATA, Inc. will ensure that we do not knowingly participate in any activity that involves any form of modern slavery or enter into business with any organisation which knowingly supports or is found to be involved in slavery, forced or compulsory labor, or human trafficking.

We encourage any individual who has concerns about the alignment of our operations to this Modern Slavery and Human Trafficking Statement or unethical behavior in any part of our business or operations to speak up, and to do so without fear of retaliation.

This statement highlights the key activities we have undertaken during this financial year to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

This joint statement is published in line with section 54(1) of the UK Modern Slavery Act 2015, section 19 of the Australian Modern Slavery Act 2018 (Cth), and Section 13(1) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act and relates to the financial year ending 31st March 2025. It covers NTT DATA, Inc. and its subsidiaries.

We fully support the aims of the aforementioned Acts and associated standards, such as the UN Guiding Principles on Business and Human Rights and are committed to tackling slavery and human trafficking wherever we can.



Abhijit Dubey

President & CEO | Chief AI Officer, NTT DATA, Inc.
26 August 2025

2. About NTT Group and NTT DATA, Inc.

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.

With over 140,000 employees globally, NTT DATA, Inc. enables clients, as well as society, to move confidently into the digital future.

Our mission is to accelerate client success and positively impact society through responsible innovation. As we help clients to transform through consulting, industry solutions, business process services, IT modernization and managed services, we always seek to ensure our work contributes to building a better world through responsible technology.

3. Scope

The scope of this Modern Slavery & Human Trafficking Statement has been designed to meet NTT DATA, Inc.'s obligations for reporting under the UK Modern Slavery Act of 2015, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act and the Australian Modern Slavery Act 2018 (collectively "Acts").

NTT DATA, Inc. and its subsidiaries ("NTT DATA") share core business operations, supply chains, policies prohibiting modern slavery, and the supporting processes further described in this statement.

This is a joint statement provided by NTT DATA, Inc. for itself and on behalf of its subsidiaries that are covered by disclosure obligations in the United Kingdom, Canada and Australia.

The reporting period for the statement covers NTT DATA fiscal year starting 1 April 2024, and ending 31 March 2025 ("FY24").

4. Our values and commitments

Our people are our most valued assets and NTT DATA is committed to cultivating an environment where every individual feels appreciated, encouraged, and empowered to thrive. Our dedication to upholding high ethical standards includes promoting transparency, accountability, and nurturing a culture of integrity.

Our Code of Business Ethics applies to all NTT DATA employees and guides our actions in conducting business, highlights our support and respect for human rights, including our commitment to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business, and encourages reporting of any suspected breaches through our [Whistleblowing Reporting System](#).

NTT DATA expects all our employees to act in accordance with the principles and values outlined in our Code of Business Ethics and other internal Policies and training resources. We further expect the same high standards from all our suppliers, sub-contractors, and other business partners.

5. Our policies on Modern Slavery & Human Trafficking

NTT DATA is committed to the principles of the Acts and there are several Policies that help us manage our modern slavery risk:

- **NTT DATA Code of Business Ethics**: Our code encourages employees to conduct all business activities in accordance with the highest level of integrity and in compliance with all applicable laws and regulations. It prohibits child labor and requires employees to respect human rights and not to discriminate based on gender, nationality, belief, or religion.
- **NTT Group Human Rights Policy**: We are fully committed to respecting the highest standards for protection of human rights, in accordance with the UN Universal Declaration of Human Rights and with the UN Guiding Principles on Business and Human Rights. The NTT Group Human Rights Policy prohibits all forms of forced and compulsory labor, human trafficking, and child labor, and highlights our commitment to correct or eradicate labor practices that violate human rights.
- **NTT DATA Group Corporation Guidelines for Sustainability in Supply Chain**: We ask all our suppliers to understand, and cooperate with these Guidelines, comply with applicable laws, respect human rights, maintain health & safety standards, engage in fair trade, protect the environment, and act in an honest and ethical manner.
- **NTT DATA SpeakUp & Whistleblowing Policy**: Our aim is to encourage openness, and we ask our employees to report any knowledge or suspicion of modern slavery or human trafficking using our Whistleblowing System. NTT DATA. operates a strict non-retaliation policy and will not, in any way, retaliate against a whistleblower acting in good faith.

We regularly review and update our Policies to ensure they remain compliant, consistent, and effective.

NTT DATA expects all our employees to act in accordance with the business values and principles outlined in our Code of Business Ethics and other internal Policies. Failure to comply with any of these Policies is taken very seriously and can result in disciplinary action.

6. Our supply chain

Our supply chains provide us with goods, works, and services and include original equipment manufacturers, cloud software companies, distributors, professional services firms, and independent contractors through recruitment agencies.

Together with our suppliers, we strive to ensure that our supply chains operate in an honest, fair, and transparent manner, free from forced labor, slavery, and servitude.

To date, we have not received any complaints or allegations of human trafficking or slavery activities against any of our suppliers, through the NTT DATA Whistleblowing System or otherwise. Should NTT DATA become aware of an incident of modern slavery or human trafficking within its supply chain, we will fully investigate the incident and work with the relevant supplier to implement swift remedial actions.

7. Our supplier requirements

All suppliers, sub-contractors, and business partners we engage with must agree to our position on human rights and commit to not using any form of forced labor and must comply with all applicable modern slavery laws and regulations. In line with the [NTT DATA Group Corporation Procurement Policy](#), all suppliers, sub-contractors, and business partners must have adequate controls in place to ensure that they are not exposed to or complicit in human trafficking and modern slavery.

Under the [NTT DATA Group Corporation's Guidelines for Sustainability in Supply Chain](#), we require that our suppliers:

- Shall not use labor obtained by coercion, detention, slavery, or human trafficking.
- Shall respect the human rights of workers, and shall not subject them to inhumane treatment, such as mental or physical abuse, coercion, harassment, or any acts that could potentially be inhumane treatment.
- Shall not employ children who are under the minimum working age as defined by the International Labour Organization or as defined by the local law.
- Shall comply with all applicable legislation regarding compensation (including minimum wage, overtime pay, and legally mandated allowances and wage reductions) paid to workers. Also, suppliers shall consider paying wages at a level that can cover the necessities of life (living wage).
- Shall not allow workers to work beyond limits defined by legislation in the area where they work and shall appropriately manage the working hours and holidays of workers with consideration for international standards. Furthermore, suppliers must grant working hours, holidays, and breaks to workers appropriately based on the legislation of each country.
- Shall comply with local legislation, and respect workers' rights to freedom of association and collective bargaining.
- That supply raw materials and parts or provide services shall conduct human rights due diligence as necessary in order to check that there are no violations.

8. Risk assessment and management

As a global technology services company, NTT DATA acknowledges the importance of addressing modern slavery risks within our organization. We believe that the risk of modern slavery in our operations is medium to low. This assessment is based on the fact that the majority of our workforce consists of skilled workers, and our supply chains are relatively straightforward, primarily involving direct relationships with original equipment manufacturers. The presence of unskilled labor among our suppliers is minimal. While we do operate in regions that may have a higher exposure to modern slavery risks, we maintain that the overall risk remains low due to our limited reliance on unskilled labor. However, NTT DATA is fully aware of the complexities and challenges associated with modern slavery in global supply chains. We are committed to implementing an effective supply chain governance framework to minimize the risks of modern slavery in the goods, works, and services we procure.

To ensure our supply chain remains free from modern slavery, NTT DATA conducts thorough due diligence during the supplier selection process. This helps us avoid any complicity in human rights abuses, slavery, forced or compulsory labor, or human trafficking. We contractually require our suppliers to comply with all applicable laws, rules, and regulations related to modern slavery and human trafficking. Any confirmed instance of modern slavery or human trafficking will be taken extremely seriously, and we will take immediate and appropriate action, including termination of contracts.

We vet all suppliers as part of the onboarding process and ensure that any supply chain issues are escalated and resolved effectively and promptly.

We are committed to continuously improving our risk assessment process to ensure we are in a position to timely identify and remediate any modern slavery concerns that could be connected to both our business and supply chain. By maintaining vigilance and fostering a culture of transparency and accountability, NTT DATA strives to uphold the highest standards of ethical conduct and human rights throughout our operations and supply chains.

8.1. Governance

NTT DATA maintains a strong governance framework to support its commitment to ethical conduct, legal compliance, and the prevention of modern slavery across its operations and supply chains. Over the past year, we have continued to enhance our governance, risk, and compliance practices, including regular policy reviews, internal training, and risk assessments. These efforts are designed to ensure that our business activities remain aligned with the requirements of the Acts.

In anticipation of the EU Corporate Sustainability Due Diligence Directive (CSDDD), we have actively supported our parent company, NTT DATA Group Corporation, through a dedicated readiness program. This program focuses on strengthening due diligence processes across the NTT DATA Group, with particular attention to human rights risks in both internal operations and external supply chains. Our participation in this program reflects our commitment to continuous improvement and alignment with emerging international standards.

To further embed human rights governance, we have established two thematic working groups (TWGs):

- The Supply Chain TWG, led by the Procurement Office at NTT DATA Group Corporation, includes procurement stakeholders from NTT DATA Group Corporation, NTT DATA, Inc., and representatives from all regions and business units of NTT DATA, Inc., and amongst other topics it focuses on identifying and addressing human rights risks in our supply chain.
- The Human Rights TWG, led by the Human Rights Office at NTT DATA Group Corporation, comprises professionals from risk and compliance, sustainability, and human resources across all regions. It focuses on human rights within the NTT DATA Group and conducts an annual Self-Assessment Questionnaire to assess risk and vulnerability, including the identification of high-risk countries.

These TWGs play a key role in supporting our CSDDD readiness and strengthening our overall human rights governance.

9. Key Performance Indicators

We assess the effectiveness of our actions through regular internal audits, supplier engagement feedback, and monitoring incident reports. These assessments inform updates to our Policies, training programs, and risk mitigation strategies.

9.1. Current actions

NTT DATA, Inc. has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organization and supply chain. These include:

9.1.1 Number of employees who have completed related training

92% of employees completed our Code of Business Ethics training for the financial year ending 31 March 2025, which included the topic of Modern Slavery.

9.1.2 Number of incidents related to ethical matters

Zero (0) reports of incidents of Modern Slavery (including human rights abuses, slavery, forced or compulsory labor, or human trafficking) were reported in relation to NTT or any of its suppliers for the financial year ending 31 March 2025.

9.1.3 Number of and type of remedial actions taken

Given zero (0) reports of any Modern Slavery incidents, no control improvements were identified by Compliance for the financial year ending 31 March 2025.

9.1.4 Related risk assessments

A high-level risk assessment was conducted across all regions and business units of NTT DATA, Inc. in December 2024 to identify and assess potential human rights related risks and vulnerabilities.

9.2. Committed improvements

9.2.1 Third Party Risk Management

In FY23 we committed to developing a tool to support Third Party Risk Management (TPRM), and the implementation of a pilot program in Q1 of FY24.

During FY24, TPRM was implemented in four pilot countries, but the User Acceptance Test (UAT) of the tool failed both technical and non-technical evaluations by the pilot countries and was not implemented as a result.

As a separate but important point, NTT DATA, Inc.'s Risk & Compliance Department is working closely with the Procurement Department. There are revisions in the NTT DATA, Inc. Procurement operating model, which includes TPRM tools as part of the broader tooling strategy and is in the final stages of issuing an RFP to selected vendors.

During FY25, an agreed TPRM Execution Plan is in place that details the key deliverables at the NTT DATA Group level, with KPI's for our regions and business units, in addition to any distinct local requirements they may have. At the NTT DATA Group level, key deliverables include:

- The development of the NTT DATA Group TPRM Policy and minimum standards.
- Refinement of the TPRM methodology as required, with simplification of the Inherent Risk Questionnaire and Third Party Questionnaires across all Risk Domains.

- Issuing a TPRM Maturity Assessment to all region and business unit Chief Risk Officers as requested. by the NTT DATA, Inc. Group Risk Management Advisory Board (RMAB).
- Quarterly TPRM Forum calls with relevant stakeholders to drive collaboration and knowledge sharing.

9.2.2 Improvement of metrics and risk assessments

Human Rights within our organization

Throughout FY25 we will be finalizing new Human Rights KPI's across the NTT DATA Group as human rights has been identified as one of thirteen material topics for NTT DATA during our Double Materiality Assessment (DMA), a crucial part of our preparation for the implementation of the European Union's Corporate Sustainability Reporting Directive (CSRD). We are also working with NTT DATA Group Corporation to develop Due Diligence Guidelines according to the requirements of the European Union's Corporate Sustainability Due Diligence Directive (CSDDD).

Additionally, we are committed to improving our annual internal Self-Assessment Questionnaire (SAQ), organized by NTT DATA Group Corporation. Working with all our regions and business units alongside NTT DATA Group Corporation we aim to improve the clarity and assessment capability of the questions included, as well as expand the scope beyond its current format. Currently the SAQ is undertaken by seven regions and business units of NTT DATA as standard, as well as specific country level entities identified as operating in a country with a medium or high risk of human rights abuses. In FY25 we aim to expand upon this to cover additional specific NTT DATA Group companies with the highest revenue and the highest number of employees.

Human Rights across our supply chain

Throughout FY25 we will be finalizing new Sustainable Supply Chain KPI's across the NTT DATA Group as sustainable supply chain management has been identified as one of thirteen material topics for NTT DATA during our Double Materiality Assessment (DMA), a crucial part of our preparation for the implementation of the European Union's Corporate Sustainability Reporting Directive (CSRD). We are also working with NTT DATA Group Corporation to develop the Supplier Code of Conduct and Supplier Guidelines according to the requirements of the European Union's Corporate Sustainability Due Diligence Directive (CSDDD), as well as developing our risk based due diligence approach, and a risk mitigation plan.

10. Training and Awareness

All NTT DATA employees are required to read and comply with our Code of Business Ethics which provides a clear set of principles for the way we conduct business as well as guidance on how to put these principles into action in their day-to-day work.

Our Code of Business Ethics makes it clear that all our employees have a responsibility to use our NTT DATA Whistleblowing Reporting System to report any genuine suspicion of criminal conduct, or a breach of legal or regulatory statutes, including instances of modern slavery or human trafficking without fear of retaliation.

To raise awareness of modern slavery, we have implemented mandatory employee training with a focus on the principles outlined in our Code of Business Ethics and other mandatory Policies. In addition, NTT DATA requires all new employees to undertake mandatory induction training.

NTT DATA is committed to ensuring that our employees that are considered most likely to observe potential modern slavery risks are fully aware of human rights and modern slavery risks, modern slavery indicators, and are equipped to identify instances of possible slavery and human trafficking within our business and supply chains.

11. Governance

Responsibility for compliance with the Acts rests with the NTT DATA, Inc. Corporate Sustainability Team, with the responsibility for the Modern Slavery & Human Trafficking Statement assigned to the Senior Team Lead: Human Rights Compliance.

NTT DATA, Inc. Corporate Sustainability Team works with the following key risk areas departments to monitor modern slavery and human trafficking risk: Human Rights, Legal, Risk & Compliance, People & Culture, Procurement, and Sales.

12. Reporting concerns

We encourage our employees, suppliers, sub-contractors, and business partners to speak up about any concerns regarding human rights, modern slavery or human trafficking in our operations or supply chain.

NTT DATA has established an external [Whistleblowing Reporting System](#) so that anyone who discovers any alleged or potential wrongdoing can report the details of it without being subjected to any disadvantageous treatment.

NTT DATA is committed to investigating all the reported matters in an appropriately robust and timely manner.