

Modern Slavery & Human Trafficking Statement FY25

24 September 2026 | Document Version 1.0

NTT DATA, Inc.

1 King William Street, London, EC4N 7AR

Table of Contents

Modern Slavery & Human Trafficking Statement FY25 1

1. Introduction 4

2. About NTT Group and NTT DATA, Inc..... 5

3. Our related policies..... 6

4. Risk management..... 7

4.1. Third Party Risk Management (TPRM)..... 8

5. Due diligence..... 10

6. Employee training 12

7. Effectiveness 13

8. Progress and challenges 15

Appendix A Entities in scope..... 16

Document history

Issue	Date	Comments	Pages Affected
1.00	24 September 2026	Original	All

1. Introduction

Respect for human rights is fundamental to how we at NTT DATA, Inc. do business. As a global technology services company, we recognize that our responsibility extends through our own operations and through the supply chains that support the delivery of services to our clients around the world.

Modern slavery, human trafficking, forced labor and child labor, as well as all forms of corruption and bribery associated with these criminal acts, have no place in our business or our supply chains. We are committed to acting ethically and with integrity, maintaining effective governance and controls, and continuing to strengthen our approach to identifying, assessing and addressing human rights risks wherever they may arise.

This Modern Slavery & Human Trafficking Statement shows the progress we have made during the financial year ending 31 March 2026 and sets out the actions we are taking to prevent and respond to modern slavery, forced labor and child labor risks. This year, we have expanded the scope of our reporting to address requirements in the United Kingdom, Australia and Canada, reflecting our commitment to transparency and continuous improvement across all our jurisdictions.

Our approach is grounded in the NTT DATA Code of Business Ethics, the NTT Group Human Rights Policy, the NTT DATA Group Procurement Policy and Guidelines for Sustainability in Supply Chain. These commitments require us, and the suppliers and business partners we work with, to respect human rights, prohibit forced labor and child labor, promote safe and fair working conditions, and provide channels through which employees, suppliers, business partners and other stakeholders may raise concerns without fear of retaliation.

We reject all forms of modern slavery, human trafficking, forced labor and child labor, and recognize the need to assess how emerging technologies, including AI and digital platforms, may affect human rights risks and support high ethical standards. We recognize that meaningful progress requires ongoing effort. While our business is primarily delivered by a skilled workforce and our direct operational risk is assessed as lower, we also recognize the complexity of global technology supply chains and the need to improve visibility, due diligence and engagement beyond our immediate supplier relationships. We will continue to strengthen our risk assessment, supplier due diligence, training, grievance mechanisms and governance so that our actions are increasingly targeted, evidence-based and effective.

On behalf of NTT DATA, Inc., I confirm our continued commitment to respecting human rights and to working to prevent modern slavery, human trafficking, forced labor and child labor in our operations and supply chains.



Abhijit Dubey

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

24 September 2026

2. About NTT Group and NTT DATA, Inc.

NTT DATA, Inc. is a global technology services company and part of NTT Group and NTT DATA Group. Our business provides consulting, industry solutions, business process services, IT modernization, managed services, cloud, digital infrastructure and related technology services to clients globally.

NTT DATA, Inc. employs over 150,000 people globally and operates through regional and business unit structures across multiple jurisdictions. This Modern Slavery & Human Trafficking Statement FY25 has been prepared as a global consolidated joint statement for NTT DATA, Inc. and the entities within scope, including subsidiaries owned or controlled by NTT DATA, Inc. listed in Appendix A. Consultation for this joint statement was undertaken through the legal, procurement, compliance & risk management, sustainability and ESG management representatives of the entities that are covered by this statement. The entities had the opportunity to review and comment on the statement before it was finalized. Our supply chains support the delivery of technology and business services and include original equipment manufacturers, cloud and software providers, distributors, professional services firms, recruitment agencies, contractors and other suppliers of goods, work and services. We source goods and services through direct supplier relationships, with procurement processes intended to assess commercial, operational, legal and sustainability considerations.

NTT DATA, Inc. supplier expectations are supported by the NTT DATA Group Procurement Policy and Guidelines for Sustainability in Supply Chain, which require suppliers to comply with applicable laws, respect human rights, maintain health and safety, engage in fair trade, protect the environment and act ethically. The Guidelines apply to direct suppliers and expect them to communicate requirements to upstream suppliers and subcontractors, confirm compliance status where relevant, and provide information when requested. Governance for modern slavery and human rights risk management is supported by the Corporate Sustainability Team, with collaboration across Human Rights, Legal, Risk & Compliance, People & Culture, Procurement and Sales teams.

NTT DATA, Inc. operates thematic working groups focused on human rights and supply chain topics, supporting coordination across regions and business units spanning the full NTT DATA Group. Information for this statement has been gathered from applicable policies, supply chain guidelines, human rights governance materials, and internal subject matter input.

3. Our related policies

The NTT DATA, Inc. approach to modern slavery, forced labor and child labor is supported by global and group-level policies, standards and supplier requirements.

- The [NTT DATA Code of Business Ethics](#) applies to all employees and officers of the NTT DATA Group and requires them to conduct all business activities ethically, with the highest level of integrity and in compliance with all applicable laws and regulations, covering also human rights.
- The [NTT Group Human Rights Policy](#) applies to all employees and officers of the NTT Group and requires suppliers and business partners to support the policy and strive to respect human rights. It commits the Group to respect internationally recognized human rights law, including the Universal Declaration of Human Rights, the International Covenants on Human Rights, the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. This policy expressly prohibits forced labor, compulsory labor, human trafficking and child labor, and commits the Group to correct or eradicate labor practices that violate human rights. It also addresses workplace safety, freedom of association and collective bargaining, living wages, fair opportunities and wages, non-discrimination, privacy, security and responsible technology.
- The [NTT DATA Group Guidelines for Sustainability in Supply Chain](#) establishes supplier expectations across human rights and labor, health and safety, environment, fair trade and ethics, quality and safety, information security and business continuity. These guidelines prohibit forced labor, inhumane treatment, child labor and discrimination. They require appropriate wages, working hours, freedom of association, grievance mechanisms and human rights due diligence; and expect direct suppliers to communicate requirements to upstream suppliers and subcontractors. These guidelines also permit audits and supplier information requests, and state that NTT Group may request improvements and take appropriate measures, including cancellation of transactions, where requirements are not met.
- [NTT DATA's Procurement Policy](#) supports fair and competitive procurement and states that procurement should emphasize human rights, the environment, safety and other critical issues in compliance with laws and social norms.
- [SpeakUp and Whistleblowing](#) encourages employees, business partners and other stakeholders to report under confidentiality and anonymously any suspected misconduct or non-compliance with related matters linked to human rights.

As a committed improvement, while NTT DATA, Inc. currently implements the NTT DATA Group policies and requirements, NTT DATA, Inc. specific Supplier Code of Conduct is in development and due for publication in FY26.

4. Risk management

NTT DATA, Inc. recognizes that modern slavery, human trafficking, forced labor and child labor and other adverse human rights impacts are risks to people, not only risks to the organisation. Our risk management approach is therefore intended to identify where workers in our operations and supply chains may be exposed to heightened vulnerability, and to assess, prevent, and mitigate those risks, also evaluating their materiality, connected to our business activities, products, services or supplier relationships. Where an actual adverse impact is identified, NTT DATA, Inc. considers appropriate action, including supporting remediation to the extent applicable, and monitoring of effectiveness of mitigation plans.

During FY25, NTT DATA, Inc. continued to build on the risk assessment approach described in the FY24 statement. Our direct operations are generally considered to present a lower risk of modern slavery reflecting the predominantly skilled nature of our workforce and our limited reliance on unskilled labor. We recognize, however, that our global operations and supply chains include countries, sectors and labor models that may present higher inherent risks of modern slavery, human trafficking, forced labor or child labor. These risks may arise through supplier labor practices, recruitment agency arrangements, subcontracting, outsourced services, facilities services, construction, logistics, hardware manufacturing, electronic equipment supply chains, and other tiers of the supply chain beyond our direct contractual relationships.

Risk assessment governance is supported by the NTT DATA, Inc. Corporate Sustainability Team, working with Human Rights, Legal, Risk & Compliance, People & Culture, Procurement and Sales. Human rights and supply chain risk management are also supported by thematic working groups which span the NTT DATA Group. The Human Rights Thematic Working Group supports human rights risk identification and assessment across regions and business units, including through an annual Self-Assessment Questionnaire. The Supply Chain Thematic Working Group supports identification and management of human rights risks in procurement and the supply chain activities, including supplier expectations, due diligence and improvement activities.

The NTT DATA, Inc. risk assessment process draws on a combination of internal and external inputs. These include internal human rights self-assessments, regional and business unit engagement, supplier onboarding and vetting processes, procurement and compliance controls, whistleblowing and grievance data, incident reporting, policy reviews, training completion data, and input from relevant functional teams. Where available, we also consider external risk indicators, including country risk, sector risk, product or service category risk, and recognized external sources on forced labor, child labor, human trafficking and wider human rights risk.

Our highest-priority modern slavery risks are most likely to arise in supply chain areas where there may be greater reliance on lower-skilled labor, subcontracted labor, migrant labor, third-party recruitment, temporary or agency workers, or work conducted in higher-risk countries or sectors. Based on our current understanding, including internal human rights self-assessments, thematic working group input, supplier onboarding and procurement processes, functional stakeholder input, grievance and incident reporting channels, and external country, sector and product/service risk indicators, priority areas for further assessment include:

- Outsourced labor and recruitment agency arrangements
- Suppliers providing facilities management, construction, logistics or other labor-intensive services;
- Hardware, electronics, data center infrastructure, telecommunications equipment and other technology supply chains, where heightened forced labor or child labor risks exist;
- Professional services and contractor models where subcontracting or labor intermediaries may reduce visibility over working conditions; and
- Countries or regions identified through internal assessments or external indices as presenting higher inherent risks of forced labor, child labor, human trafficking, weak labor protections or limited access to remedy.

NTT DATA, Inc. manages these risks through a combination of policy commitments, supplier expectations, due diligence, onboarding controls, contractual requirements, training, governance forums and escalation pathways. Suppliers are expected to comply with applicable laws, respect human rights, prohibit forced labor, child labor and human trafficking, maintain fair and safe working conditions, respect working time and wage requirements, and conduct human rights due diligence where necessary. The NTT DATA Group Guidelines for Sustainability in Supply Chain expect direct suppliers to communicate requirements to upstream suppliers and subcontractors and to confirm compliance status where relevant.

Where potential issues are identified through onboarding, due diligence, risk assessment, whistleblowing, audits, supplier engagement or other sources, concerns are expected to be escalated to the appropriate business, procurement, compliance, legal, human rights or sustainability teams for review and action. Depending on the nature and severity of the issue, potential actions may include further information requests, supplier engagement, remediation planning, corrective action requirements, enhanced monitoring, suspension of new activity or termination of the supplier relationship.

NTT DATA, Inc. continues to strengthen its approach to risk management, and the scope of this statement has expanded to address Canadian requirements in addition to UK and Australian requirements. We are also continuing to improve our human rights and sustainable supply chain governance, including through work on human rights KPIs, sustainable supply chain KPIs, due diligence guidance, and a risk-based due diligence approach. These developments aim to improve our ability to identify, priorities, assess and manage risks to people across both our operations and supply chains.

We recognize that there are limitations in our current risk identification and assessment processes. Our visibility beyond tier-one suppliers remains limited in some areas, and more granular supply chain mapping is required to identify risks linked to subcontracting, upstream manufacturing, raw material extraction, labor intermediaries and migrant worker recruitment pathways. We also recognize the need to strengthen evidence of direct worker engagement, external stakeholder engagement and supplier collaboration in higher-risk supply chain categories. Our continuous improvement priorities are therefore to expand the scope and quality of risk assessments, improve supplier and category-level risk data, enhance high-risk country and sector analysis, strengthen supplier due diligence, and develop clearer indicators to assess whether risk management activities are reducing risks to workers.

4.1. Third Party Risk Management (TPRM)

During FY25, NTT DATA, Inc. continued to strengthen its Third-Party Risk Management capability through the execution of a global improvement program focused on governance, supplier risk oversight, risk assessment, and operating model alignment at NTT DATA, Inc. These activities support our ability to identify, assess, and manage risks within its third-party ecosystem, including potential human rights and modern slavery risks within the supply chain.

Key progress achieved during FY25 included:

- Completion of a global TPRM maturity assessment across regions and business units to establish a baseline view of current capabilities and identify opportunities for continued improvement.
- Continued collaboration between Risk & Compliance and Procurement to strengthen supplier lifecycle governance and integrate third-party risk considerations into broader procurement processes.
- Continued quarterly stakeholder engagement forums to promote collaboration, share leading practices, discuss emerging third-party risks, and support greater consistency in risk management activities across NTT DATA, Inc..

Committed Improvements

During FY26, NTT DATA, Inc. is continuing to enhance its Third-Party Risk Management capability through the following initiatives:

- Approval and publication of the NTT DATA Group TPRM Policy, followed by its implementation and embedding across the NTT DATA, Inc. Group.
- Continued enhancement of supplier due diligence, risk assessment, monitoring, and reporting activities across NTT DATA, Inc., aligned with NTT DATA Group criteria.
- Development and enhancement of TPRM metrics, reporting, and management information to strengthen third-party risk oversight and support informed decision-making.
- Ongoing maturity improvement initiatives informed by the outcomes of the global TPRM maturity assessment.
- Development and implementation of a third-party risk management platform for suppliers and vendors and associated process enhancements to support a more consistent, scalable, and technology-enabled approach to third-party risk management across NTT DATA, Inc.

5. Due diligence

The approach to due diligence at NTT DATA, Inc. is grounded in its commitment to respect internationally recognized human rights and to identify, prevent, mitigate and address actual or potential adverse human rights impacts connected to its operations and supply chains. Modern slavery, human trafficking, forced labor and child labor are treated as core human rights risks and are managed through a combination of policy commitments, supplier expectations, procurement processes, risk assessment, grievance mechanisms, incident escalation and remediation principles.

The NTT Group Human Rights Policy commits the NTT Group to conduct human rights due diligence across the value chain, based on the UN Guiding Principles on Business and Human Rights. The policy describes a process to identify, prevent, mitigate and address human rights adverse impacts on a global scale; raise awareness; improve human rights management; conduct due diligence across the value chain; and use direct dialogue. It also commits NTT Group to conduct regular assessments of human rights impacts, identify priority issues, embed human rights policies and management into business operations, confirm the effectiveness of measures, disclose due diligence activities, engage in dialogue with third parties where risks are identified, and take appropriate action, including suspension of transactions, where forced labor, inhumane treatment, child labor, discrimination or wages below minimum wage or other human rights related concerns are recognized.

Supplier due diligence across NTT DATA, Inc. is supported by procurement controls and the NTT DATA Group Guidelines for Sustainability in Supply Chain. These guidelines include requirements that suppliers build management systems, establish complaint processing mechanisms, disclose relevant information, prohibit forced labor, inhumane treatment, child labor, and discrimination, provide proper wages and allowances, regulate working hours, respect freedom of association and collective bargaining, and conduct human rights due diligence in the supply chain where necessary. The guidelines also require direct suppliers to communicate requirements to upstream suppliers and subcontractors and promote and confirm compliance. NTT Group may conduct audits or request information to confirm implementation, may request improvements where requirements are not met, and may take appropriate measures which may also include termination of the business relationship with the supplier in certain cases.

During FY25, NTT DATA, Inc. continued to use supplier onboarding, supplier vetting, contractual requirements, procurement governance, policy communication, training, risk assessment and whistleblowing arrangements to prevent and mitigate modern slavery risks. Suppliers are expected not to use any form of labor obtained through coercion, detention, slavery, servitude or human trafficking; not to recruit, transport, transfer, harbor, receive conceal, or hire people through threats or the use of force, intimidation, coercion, abduction fraud, deception, abuse of power or abuse of a position of vulnerability, or the giving or receipt of payments or benefits to obtain the consent of a person having control over another person, for the purpose of exploitation; not to exploit workers through recruitment fees or debt; and not to confiscate or restrict access to identity documents, except where legally required. Suppliers are also expected to provide employment contracts in a language workers can understand before foreign workers leave their home countries, and not to impose unreasonable restrictions on workers entering or leaving facilities or moving within them.

NTT DATA, Inc.'s due diligence approach currently focuses primarily on direct suppliers and contractual relationships. Where modern slavery risks or concerns are identified, they are expected to be escalated through procurement, compliance & risk management, legal, human rights, sustainability or relevant business channels for review. Depending on the nature and severity of the issue, NTT DATA, Inc. may seek further information, engage with the supplier, require corrective actions, monitor progress, suspend activity, terminate contracts or take other appropriate measures. Where impacts are identified, NTT DATA, Inc.'s approach is to support appropriate remediation, consistent with its Human Rights Policy and whistleblowing commitments.

NTT DATA, Inc. has formally implemented a SpeakUp & Whistleblowing system that provides channels through which concerns can be raised by employees, business partners and other stakeholders. The NTT DATA SpeakUp and Whistleblowing Policy arrangements enable reporting of suspected wrongdoing, including concerns relating to modern slavery, forced labor, child labor, human trafficking or other human rights impacts without fear of retaliation, supported by the ability to make anonymous concerns through this independent platform. The NTT Group Human Rights Policy also commits to internal and external whistleblowing contact points, protection of whistleblowers from unfair or disadvantageous treatment, appropriate reporting to the Board of Directors, and appropriate measures to address identified issues.

NTT DATA, Inc. maintains processes to identify, escalate and investigate concerns relating to modern slavery, human trafficking, forced labor and child labor and to support remediation where adverse impacts are identified.

During FY25, NTT DATA, Inc. did not implement any specific remediation measures relating to modern slavery, forced labor or child labor within its operations or supply chains. Based on the matters assessed during the reporting period, NTT DATA, Inc. did not identify circumstances that required remediation of loss of income to vulnerable families arising from efforts to eliminate forced labor or child labor.

If concerns are identified in future, NTT DATA, Inc. will investigate, take appropriate action to prevent further harm, engage relevant suppliers and stakeholders, and support remediation where appropriate.

NTT DATA, Inc. recognizes that effective due diligence requires ongoing improvement. Our current approach has advanced from the previous statement through expanded legal scope, increased alignment to Canadian forced labor and child labor reporting requirements, continued group-level work on human rights due diligence, and the development of sustainable supply chain and human rights governance. Further development is required to improve visibility beyond tier-one suppliers, strengthen evidence of supplier and worker engagement, better assess the effectiveness of grievance mechanisms, and develop more systematic processes for identifying and mitigating risks linked to recruitment agencies, subcontracting, migrant labor and high-risk supply chain tiers.

6. Employee training

Training and awareness are an important part of NTT DATA, Inc.'s approach to preventing and responding to modern slavery, human trafficking, forced labor and child labor. NTT DATA, Inc. provides mandatory training and policy awareness activities to help employees understand expected standards of conduct, recognize potential concerns and know how to report suspected misconduct or human rights impacts.

All employees are required to read and comply with the NTT DATA Code of Business Ethics. The Code sets out principles for ethical behavior and compliance with applicable laws and policies, including respect for human rights and the expectation that employees report suspected misconduct or other ethical or compliance concerns. The Code of Business Ethics and associated training help raise awareness of modern slavery, forced labor, child labor, human trafficking, other human rights issues, unethical conduct and the available whistleblowing reporting channels.

During FY25, NTT DATA, Inc. continued to provide mandatory training to employees on the Code of Business Ethics and related compliance topics. This training includes content relevant to human rights and modern slavery risks, including the importance of identifying and reporting concerns. New employees are also required to complete mandatory training, helping embed these expectations from the start of employment.

- 94% of employees completed the Code of Business Ethics training in FY25

NTT DATA, Inc. recognizes that different functions may encounter different modern slavery risks. Employees in procurement, legal, compliance, sustainability, human resources and management roles may have responsibilities for identifying, assessing, preventing or escalating risks. Employees involved in supplier onboarding, contracting, supplier relationship management, recruitment, labor agency engagement, facilities services, logistics, construction, data center operations or supplier due diligence may be more likely to encounter risk indicators and therefore require targeted awareness of modern slavery, human trafficking forced labor and child labor risks.

NTT DATA, Inc. intends to continue improving its training approach by strengthening role-based training for higher-risk functions, expanding practical guidance on modern slavery indicators, and improving awareness of how supply chain practices, recruitment channels, subcontracting and purchasing decisions may affect risk. Future training improvements should also support employees and suppliers to understand grievance routes, escalation pathways, protection against retaliation, and expectations for prompt reporting of suspected forced labor, child labor, human trafficking or other human rights concerns. Our Code of Business Ethics training will be strengthened in FY26, with the inclusion of additional human rights topics and focused scenarios.

Additionally, NTT DATA, Inc. is creating a Sustainability Academy that is due to be launched in FY26 and will feature a specific module on human rights. The module will focus on educating employees on three aspects: why human rights are important to NTT DATA, Inc., what actions NTT DATA, Inc. is taking, and what employees can do to support human rights across the business.

7. Effectiveness

NTT DATA, Inc. assesses the effectiveness of its modern slavery, human trafficking, forced labor and child labor response through a combination of training data, incident reporting, risk assessment, supplier due diligence, policy review, governance forums and continuous improvement activity. These measures help NTT DATA understand whether its policies, controls and processes are operating as intended and where improvements are required.

The core indicators currently used or under development include:

Currently used:

- Completion of mandatory Code of Business Ethics and related training;
- Number of reported incidents, allegations or concerns relating to modern slavery, forced labor, child labor, human trafficking or other human rights impacts;
- Number and type of remediation or corrective actions taken;
- Completion and results of internal human rights risk assessments;
- Participation in the annual internal Self-Assessment Questionnaire

Under development:

- Progress against human rights and sustainable supply chain material topic KPIs;
- Progress against Third Party Risk Management methodology, maturity assessment and forum activities;
- Supplier onboarding, vetting, due diligence or assessment outcomes where available; and
- Progress in developing a risk-based supply chain due diligence approach and risk mitigation plan

Governance for monitoring effectiveness is shared across relevant functions, including Corporate Sustainability, Human Rights, Legal, Risk & Compliance, Procurement and People & Culture. Human rights and supply chain thematic working groups support coordination and monitoring across regions and business units. Third Party Risk Management activity is also supported through Risk and Procurement functions, including work on policy, methodology and maturity assessment.

NTT DATA, Inc. uses quantitative and qualitative data to assess effectiveness. Quantitative data may include training completion rates, incident volumes, supplier assessment volumes, questionnaire completion rates and audit or due diligence metrics. Qualitative data may include findings from self-assessments, supplier engagement, internal stakeholder feedback, policy reviews, governance discussions, incident analysis and lessons learned from risk management activity.

During FY25, NTT DATA, Inc. continued to build greater maturity in its effectiveness assessment approach. The expansion of reporting scope, including Canadian requirements, has further reinforced the importance of demonstrating how NTT DATA, Inc. assesses whether forced labor and child labor are being effectively addressed in its business and supply chains. NTT DATA, Inc. is therefore working to strengthen the link between policies, risk assessment, due diligence, supplier engagement, training and measurable outcomes.

NTT DATA, Inc. recognizes that some current indicators are activity-based rather than outcome-based. For example, training completion, policy publication and supplier onboarding are useful measures of implementation but do not demonstrate whether risks to workers have reduced. Further development is required to introduce more outcome-focused indicators, such as the quality and coverage of risk assessments, responsiveness to identified red flags, closure of corrective action plans, supplier improvement outcomes, worker access to grievance mechanisms, and evidence that purchasing or procurement practices are not increasing exploitation risks.

NTT DATA, Inc.'s continuous improvement priorities include developing clearer goals, KPIs and monitoring processes for modern slavery, forced labor and child labor; improving data collection

across regions and business units; strengthening reporting on supplier due diligence outcomes; and using findings from assessments, grievance data and governance forums to inform policy, training, procurement and risk management improvements.

8. Progress and challenges

FY25 represents an important transition year for NTT DATA, Inc.'s modern slavery reporting. The scope of this statement has expanded to include Canadian forced labor and child labor reporting requirements. This has required NTT DATA, Inc. to review the structure of the statement, broaden terminology from modern slavery and human trafficking to include forced labor and child labor, and assess where additional evidence is required.

NTT DATA, Inc. has continued to strengthen human rights and sustainable supply chain governance. This includes supporting and strengthening our Human Rights and Supply Chain Thematic Working Groups, continued development of human rights and sustainable supply chain KPIs, and ongoing improvements to due diligence processes, supplier expectations, risk assessment and risk mitigation. NTT DATA, Inc. has also continued to make use of training, whistleblowing arrangements, supplier expectations and risk assessment processes to support prevention and response.

NTT DATA, Inc. has also continued to improve its understanding of areas requiring further maturity. Key challenges include the complexity and global nature of technology supply chains, limited visibility beyond tier-one suppliers in some categories, reliance on supplier-provided information, varying levels of data availability across regions and business units, and the need to connect group-level policies and frameworks to consistent local implementation. Mapping labor supply chains, subcontracting arrangements, migrant worker recruitment pathways and lower-tier hardware, electronics or raw material risks remain challenging and require further development. NTT DATA, Inc. therefore also continuous to be aware of the increasing role of artificial intelligence, digital platforms and online technologies in facilitating the recruitment, targeting and exploitation of vulnerable individuals, creating new and evolving modern slavery, forced labor and child labor risks that require continued monitoring and assessment.

The expansion to Canadian reporting requirements also raises additional evidence needs, particularly around forced labor and child labor training, measures taken to remediate forced labor or child labor, and measures taken to remediate loss of income to vulnerable families if any actions are taken to eliminate forced labor or child labor. NTT DATA, Inc. recognizes the need to strengthen incident tracking, escalation, remediation protocols and outcome reporting.

Looking ahead, NTT DATA, Inc. intends to continue improving its approach by:

- Strengthening modern slavery, forced labor and child labor risk assessment methodology;
- Improving supply chain mapping and supplier category risk analysis;
- Developing more outcome-focused KPIs and monitoring processes;
- Strengthening supplier due diligence and risk-based supplier engagement;
- Improving role-based training for functions most likely to identify or manage modern slavery risks;
- Enhancing grievance, escalation and remediation processes;
- Improving evidence collection across regions and business units; and
- Continuing alignment with emerging due diligence expectations, including CSDDD-related work.

NTT DATA, Inc. recognizes that effective prevention of modern slavery, forced labor and child labor require continuous improvement. NTT DATA, Inc.'s priority is to move progressively from policy commitments and activity tracking toward deeper risk visibility, stronger due diligence, more consistent supplier engagement, and clearer evidence that actions are reducing risks to workers.

Appendix A Entities in scope

This Modern Slavery & Human Trafficking Statement applies to NTT DATA, Inc. and the following NTT DATA, Inc. subsidiaries.

Table 1 - Entities in scope

Name	Jurisdiction
CyRise 2017 Unit Trust	Australia
CyRise Accelerator Pty Ltd	Australia
DDA Holdings Pty Limited	Australia
Natuvion Australia Pty Ltd	Australia
NIVEUS AUSTRALIA PTY LTD	Australia
NTT Australia Digital Pty Ltd	Australia
NTT Australia Pty Ltd	Australia
NTT Australia Solutions Pty Ltd	Australia
NTT Cloud Communications Australia Pty Ltd	Australia
NTT Cloud Infrastructure Australia Pty Ltd	Australia
NTT Com ICT DC Solutions (Australia) Pty Ltd	Australia
NTT Com ICT Solutions (Australia) Pty Ltd	Australia
NTT DATA Business Solutions APAC Pty Ltd	Australia
NTT Data Business Solutions Australia Pty Ltd	Australia
NTT DATA Payment Services Victoria Pty Ltd	Australia
NTT DATA Services Australia Pty Ltd	Australia
NTT DATA Services Technology Solutions Pty Ltd	Australia
NTT DATA Victorian Ticketing System Pty Ltd	Australia
NTT Ltd Group Services Australia Pty Ltd	Australia
Millennium Process Group, Inc	Canada
My Supply Chain Group Canada LLC	Canada
NTT Canada Inc.	Canada
NTT Cloud Communications Canada Inc.	Canada
NTT DATA BCU, Inc.	Canada

Name	Jurisdiction
NTT DATA Business Solutions Incorporated	Canada
NTT DATA Canada, Inc.	Canada
NTT Global IP Network Canada Corporation	Canada
ALCHEMY TECHNOLOGY SERVICES LIMITED	United Kingdom
DIMENSION DATA HOLDINGS LIMITED	United Kingdom
Dimension Data Limited (England)	United Kingdom
e2y Limited	United Kingdom
Everisconsultancy Ltd.	United Kingdom
In Cloud Solutions Limited	United Kingdom
ITOM Solutions Limited	United Kingdom
Keane Pension Trustees Limited	United Kingdom
Muscovite Bidco Limited	United Kingdom
Muscovite Holdco Limited	United Kingdom
Muscovite Midco Limited	United Kingdom
Muscovite Topco Limited	United Kingdom
Nocitra Limited	United Kingdom
NTT Cloud Communications UK Ltd.	United Kingdom
NTT Cloud Infrastructure United Kingdom Limited	United Kingdom
NTT DATA Business Solutions Ltd.	United Kingdom
NTT DATA EMEA Ltd	United Kingdom
NTT DATA Services UK Limited	United Kingdom
NTT DATA UK Ltd.	United Kingdom
NTT EUROPE LTD.	United Kingdom
NTT GLOBAL DATA CENTERS ASSET MANAGEMENT LIMITED	United Kingdom
NTT Global Data Centers EMEA Ltd.	United Kingdom
NTT Global Data Centers EMEA UK Ltd.	United Kingdom
NTT GLOBAL DATA CENTERS HH3 LTD	United Kingdom
NTT Global Data Centers HH4 Limited	United Kingdom

Name	Jurisdiction
NTT GLOBAL DATA CENTERS LON2-A LTD	United Kingdom
NTT Limited	United Kingdom
NTT LTD Commerce Centre United Kingdom Limited	United Kingdom
NTT Ltd Group Services United Kingdom Limited	United Kingdom
NTT Security (UK) Limited	United Kingdom
NTT United Kingdom Holdings Limited	United Kingdom
NTT United Kingdom Limited	United Kingdom
Opal Wave Solutions Ltd	United Kingdom
Sapphire Systems Limited	United Kingdom
Transatel UK Limited	United Kingdom
WEAVEABILITY HOSTING LIMITED	United Kingdom
WEAVEABILITY LIMITED	United Kingdom