



Policy Document

SpeakUp & Whistleblowing Policy

NTT DATA, Inc. Group

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Contents

- 1. Introduction.....5**
- 1.1. Purpose5
- 1.2. Scope5
- 1.3. Reporting of Concerns or Misconduct6
- 1.4. Non-Compliance with the SpeakUp Policy7
- 1.5. Local Variations and Exceptions7
- 1.6. Training.....7
- 1.7. Audit and Compliance.....7
- 1.8. Continual Improvement.....7
- 2. Speaking Up and Protection of the Reporter8**
- 2.1. Confidentiality8
- 2.2. Anonymity.....8
- 2.3. Protection of Personal Data8
- 2.4. False Allegations9
- 2.5. Non-Retaliation.....9
- 3. SpeakUp Process10**
- 3.1. Making a Report10
- 3.1.1 Available SpeakUp channels for Employees10
- 3.2. Acknowledgment11
- 3.3. Review and Action11
- 3.4. Decision and Feedback11
- 3.5. Appeal12
- Appendix A SpeakUp Contact Information.....13**

List of abbreviations

Abbreviation	Meaning
Our Code	Code of Conduct and Business Ethics.
Inc. Group HQ RC	NTT DATA, Inc. Group HQ Risk and Compliance Office.
“NTTD, Inc. Group” ‘we,’ ‘us,’ ‘our’	NTT DATA, Inc. Group and each of its subsidiaries and affiliates.

Definitions

Definition	Meaning
NTT DATA Group or NDHQ	Means Kabushiki Kaisha NTT DATA GROUP (NTT DATA GROUP CORPORATION), a company located in Japan.
NTT DATA, Inc. or Inc	Means Kabushiki Kaisha NTT DATA, Inc. (NTT DATA, Inc.), a company located in Japan.
NTT DATA, Inc. Group	Inc. Group Means NTT DATA, Inc. Group HQ, and the Group Companies defined in the Inc Group Agreement between NTT DATA, Inc. Group and Unit HQs.
Inc Group Agreement	Means the NTT DATA, Inc. Group Agreement between NTT DATA, Inc. Group and Unit HQs.
This Policy	SpeakUp & Whistleblowing Policy.
SpeakUp	Means either the act of reporting a whistleblowing matter or an ethical or compliance related matter through an approved channel in accordance with this Policy, or it means the actual reporting channel in place to receive Ethics, compliance related and whistleblowing reports.
Report	Ethics and compliance related reports, including any whistleblowing cases.
Reporter	Any person who raises a compliance related or whistleblowing report, including a complainant.
Unit/ Units	Means Regional Units / Service Units / Global Practices of NTTD, Inc. Group which are defined by NTTD, Inc. Group for group management purposes.

Document Control

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2.00			

1. Introduction

NTTD, Inc. Group, as well as those working for or with NTTD, Inc. Group, agree to comply with all applicable domestic and foreign laws, regulations, governmental rules and requirements applicable to the business, promote compliance with applicable international standards, and to adhere to the Code of Business Conduct (our “Code”), while ensuring that business activities are always conducted with integrity and ethical conduct.

Everyone should do the right thing, even if no one is watching. We want to enable a compliant and an ethical culture that empowers and encourages our employees, clients, third parties and communities to do the right thing and to feel comfortable to “SpeakUp” when they see or suspect any misconduct in the business, including violations of our Code, internal policies, applicable laws and regulations, or are acting in a way that is not in keeping with our values.

In order to ensure a consistent approach to ethical reporting and investigations across our group, and to align this approach to best practice and international standards, NTTD, Inc. Group has adopted a centralised reporting channel. An effective SpeakUp and whistleblowing process allows NTTD, Inc. Group to demonstrate its global commitment to ethical practices.

This Policy describes our responsibility to ensure that all Reports are treated confidentially, fairly, ethically, responsibly and the measures we take to do this.

1.1. Purpose

The purpose of this Policy is to:

- Demonstrate and reinforce our commitment to conduct business with the highest level of transparency, ethics, and integrity.
- Encourage and give opportunity to employees, clients, and third parties to SpeakUp when they see, experience or suspect any unethical behaviour or misconduct in our business.
- Provide guidance to individuals who want to SpeakUp about known or suspected unethical behaviour or misconduct.
- Describe the measures we take to ensure that individuals who SpeakUp in good faith, are protected against any threat of retaliation.
- Describe our processes for investigating and responding to Reports in a confidential, fair, ethical, responsible, and compliant way.
- Assign roles and responsibilities for responding to Reports across our business operations.
- Demonstrate our commitment to complying with applicable whistleblowing laws and regulations.
- Provide principles and rules for the management of the NTTD, Inc. Group SpeakUp reporting process.
- Promote inclusive collaboration among NTTD, Inc. Group and Units.

1.2. Scope

This Policy applies to anyone who wishes to raise any concerns about actual or suspected unethical behaviour or misconduct within NTTD, Inc. Group and/or is responsible for responding to Reports, including but not limited to:

- Employees (including current, prior, and future employees, applicants, trainees, directors, members of the administrative/supervisory bodies of the entity, including non-executive members and shareholders of NTTD, Inc. Group);
- Clients and any representatives thereof;

- Other third parties (including contactors, suppliers, vendors, service providers, agencies, consultants, and partners) and any representatives thereof; and
- Any other person who wishes to raise a Report based on any interaction with NTTD, Inc. Group

1.3. Reporting of Concerns or Misconduct

All individuals have the responsibility to report incidents of unethical behaviour. Incidents may be actual or suspected breaches of our Code, NTTD, Inc. Group Policies, or any laws and regulations.

Concerns that should be raised under this Policy include, but are not limited to:

- Breaches of our Code and Values
- Violations of any of our policies
- Violations of applicable laws and regulations (criminal or civil)
- Criminal activity or offences (e.g., theft, violence, damage against property)
- Fraud, bribery, money laundering, terrorist financing, insider trading or other corrupt practices
- Anti-competitive behaviour or trade practices
- Conflicts of interest
- Violations of sanctions and export and import controls
- Improper procurement and sourcing practices
- Negligence causing substantial and specific risk to public health and safety of all;
- Manipulation of company data/records.
- Health and safety concerns
- Human Rights violations
- Discrimination, bullying or harassment, including assault
- Environmental issues
- Financial misstatements or irregularities and/or the provision of inaccurate or misleading information
- Unacceptable use of information assets and/or bypassing information security controls
- Disclosure or improper use (including theft of) of confidential information,
- Unethical or unlawful processing of personal data
- Violations of intellectual property, trademarks, or copyrights
- Abuse of authority
- Wastage / misappropriation of company funds / assets.

When making a Report, ensure that you exercise due care to provide honest, accurate information and as much detail as possible, including:

- Who was involved - details of the person(s).
- What happened - (in chronological order).
- A summary of the allegation, including evidence or witnesses available to support the allegation of the Reporter.
- When did it occurred - (in chronological order) Dates and times, if available.
- Where did it happen - location and name of company.
- Has this been reported in any other forum (e.g. to your line manager, or Human Resources).

The more information that you provide in the Report, the easier it will be for our team to investigate.

Cooperation from the Reporter is helpful for NTTD, Inc. Group to appropriately and effectively investigate Reports that are raised, so please respond to any follow up questions or requests for further information that you may receive from the relevant compliance department.

1.4. Non-Compliance with the SpeakUp Policy

Any employee who fails to comply with this Policy including provisions relating to non-retaliation, may be subject to disciplinary action, including dismissal.

1.5. Local Variations and Exceptions

NTTD, Inc. Group Units and their operating entities are responsible for compliance with any local laws and regulations that apply to their area of the business. If local laws and regulations establish more rigorous standards than provided for in this Policy or prohibit any activities outlined in this Policy, then local laws and regulations must be followed by the relevant operating entity.

All local variations, additional requirements and/or exceptions to this Policy must be reviewed by the NTTD, Inc. Group Unit CRO and recommended to the Inc. Group HQ RC CRO for approval, in line with the NTTD, Inc. Group Authorities Matrix.

1.6. Training

We are committed to building a transparent and ethical culture that ensures that employees and third parties act with integrity in all that we do.

All employees and third parties must be aware of, understand and follow this Policy and any applicable addendum to it.

Employees will receive mandatory training on this Policy, any related policies, and where they may go to make a SpeakUp Report.

Individuals responsible for responding to Reports and/or performing investigations must be appropriately trained to ensure that they handle Reports, communicate with individuals who SpeakUp, and respond to Reports (including performance of any investigations) in a suitable manner.

1.7. Audit and Compliance

The design, implementation and operating effectiveness of this Policy and its associated controls is subject to ongoing monitoring, review, and audit.

Compliance with this Policy is monitored on a periodic basis and reported to Inc. Group HQ RC, the Unit CRO and the relevant Unit governance structure.

1.8. Continual Improvement

This Policy is subject to continual review and improvement and will be reviewed by the Inc. Group HQ RC at least annually.

2. Speaking Up and Protection of the Reporter

This Policy encourages you to raise concerns about known or suspected misconduct through a variety of channels (see below paragraph 3.1.1.). We are committed to ensuring that at all times we treat Reports confidentially and act in a fair, ethical, responsible, and lawful way.

2.1. Confidentiality

We treat all Reports in a confidential and sensitive manner and only share information relating to SpeakUp Reports on a need-to-know basis.

Except to the extent necessary to conduct the investigation and take remedial action, at all times SpeakUp Reports, including all information disclosed or obtained in the course of an investigation, including the identity of the Reporter and all parties involved in the investigation must be protected against unauthorized access, use, loss, damage, or abuse through the implementation of reasonable and appropriate technical and organizational measures to ensure the ongoing confidentiality, integrity, availability, and resilience of information gathered in SpeakUp Reports.

The Reporter and all employees participating in the investigation process are always bound by confidentiality during and after the investigation.

2.2. Anonymity

You can choose to remain anonymous or to share your identity at the time of making a Report, or at any time thereafter.

Our SpeakUp platform maintains your anonymity at all times, unless you choose to share your identity with us in your Report. If you choose to Report anonymously, the Report must include as many details as possible in order to enable us to investigate the Report. Please make sure that you continuously check back into the SpeakUp system to receive any communication or questions from the compliance or investigatory team, should we have any questions that relate to your Report.

Your Report will be identified through a unique case number that will be provided to you at the time of making your Report. Please note your case number and keep it safe. Your case number enables you to keep track of your Report and any actions taken to respond to your Report. It will also enable us to request any further clarification or information from you.

We do, however, encourage you to share your identity in your Report as in some cases, anonymity may limit our ability to effectively investigate your Report and take appropriate action. Your identity will be kept confidential at all times and only disclosed on a need-to-know basis.

If you share your identity with us and we need to disclose your identity to other parties in conformity with the applicable laws (e.g., relevant authorities) in order to effectively respond to your Report and such disclosure is necessary and appropriate, we will notify you in advance to such disclosure.

2.3. Protection of Personal Data

We are committed to ensuring that personal data processed for the purpose of speaking-up and responding to Reports will be processed in a transparent, fair, ethical and lawful way in accordance with our SpeakUp & Whistleblowing Privacy Notice.

Personal data processed for the purpose of speaking-up and responding to Reports, in accordance with this Policy, will be kept confidential and will only be used for the purposes

described in this Policy and the SpeakUp & Whistleblowing Privacy Notice, and/or to comply with applicable laws and regulations and/or in the public interest.

2.4. False Allegations

All Reports made in good faith will be treated fairly, ethically, and responsibly, in accordance with applicable laws and regulations. If an individual makes a Report in good faith, which is not confirmed by a subsequent enquiry or investigation, no detrimental action will be taken against the individual making the Report.

It is a violation of our Code and this Policy to knowingly make a false accusation or defamatory and/or misleading Report. Any person who is found to have made a Report in bad faith, may be subject to disciplinary or other legal action.

2.5. Non-Retaliation

We have a strict non-retaliation policy and will not tolerate any harassment or victimization towards anyone for speaking-up in good faith. Retaliation includes any direct or indirect acts or omissions, prompted by the Report, that may cause unjustified detriment to individuals who have made a Report or to any individual, other than the Reporter, who is also protected under this Policy, including without limitations the following:

(a) facilitators (any person who promotes or encourages the Reporter to communicate the Report or who helps the Reporter to provide meaningful or necessary information in relation to the Report)).

(b) individuals, such as colleagues or relatives of the Reporter.

(c) legal entities with any link to the Reporter.

(d) any individuals working under the supervision and direction of contractors, subcontractors and suppliers.

If you experience any form of retaliation, or you notice any form of retaliation against anyone else, for speaking-up in good faith about known or suspected unethical behaviour or misconduct, immediately report this via one of our SpeakUp channels. A report on retaliation against an individual who has made a Report is treated like any other Report and the same procedure is followed.

We are committed to supporting all individuals who SpeakUp in good faith and, where requested, may assist individuals to make a Report and provide appropriate assistance where required.

3. SpeakUp Process

All Reports will follow the SpeakUp process outlined below.

3.1. Making a Report

There are several SpeakUp channels available to you to make a Report when you know of or suspect misconduct in our business.

We encourage employees, clients, third parties and other stakeholders to come to us first, before approaching any external bodies, institutions, authorities or the media, by using the channels described below.

3.1.1 Available SpeakUp channels for Employees

There are several channels available to employees to make a Report, including:

- Your line manager;
- Your local / Unit/ Global HR team or representative;
- Your local/ Unit/ Global Compliance department or local / Unit Legal counsel
- The Inc. Group HQ RC by sending an email to: business.conduct@global.ntt; and
- Our 24/7 anonymous and confidential SpeakUp platform, as follows:



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



Via our SpeakUp App by scanning the QR code on the left.



Over the phone by dialing your country specific number outlined in Appendix A of this policy

When making a SpeakUp Report over the phone, make sure to pronounce clearly, and ideally spell out any names or locations. Once you are finished, simply hang-up.

Have a pen ready when making your Report on our SpeakUp platform. You will be required to set up a password and you will thereafter receive a reference number for the specific Report. It is important that you write this down and keep it safe, as you need it to be able to track the progress of your Report and provide any additional information. You will be asked to enter this number each time you access the SpeakUp platform.

If you have left a voice message via the phone on our Speak Up Platform, our response will be communicated back to you as a voice message, when you log on again via the phone to receive the communication.

All Reports received through the SpeakUp platform will be anonymous (unless you volunteer to provide your personal data) and will be received by the Inc. Group HQ RC. The Report will then be assessed and referred to the relevant Unit CRO.

You are encouraged, as the first step, to Report the known or suspected violations of the Code of Conduct, policies or applicable laws through your local process of either reporting to your direct line manager, the local compliance department or the people function, where relevant.

However,

a) if you are fearful of confidentiality or retaliation by reporting the incident to the local process; or

(b) the matter is a significant issue/incident of potential global impact such as bribery or fraudulent financial reporting or

(c) if local compliance failed to address the incident, then you can report it directly to the Unit Chief Risk and Compliance Officer or via the anonymous SpeakUp platform.

3.2. Acknowledgment

Once you have submitted your Report it will be translated, if required, and we will acknowledge receipt of your Report within seven calendar days.

In some instances, we may need further clarification or information from you to support our ability to respond to your Report and will reach out to you for more information.

3.3. Review and Action

All Reports under this Policy will be investigated promptly and appropriately. Once we have all the initial information, we will carefully assess your Report and determine the appropriate actions required to be taken to address your concerns. Such actions may include internal enquiries and investigations.

All investigations are conducted in a professional, objective, unbiased, factual, and consistent manner, in accordance with relevant laws and regulations, and are performed by qualified personnel. The Unit Chief Risk Officer will identify and appoint the appropriate personnel or third party to perform the investigation. If needed, third party experts (e.g., lawyers or accountants) can be engaged to assist in investigations. The duration of an investigation will depend on the circumstances of the case, including the number of allegations, witnesses, and other factors. We will provide feedback within a timeframe of 3 months from the acknowledgment of receipt of the Report.

Details of the case, your identity, and the identity of anyone else mentioned in the Report, are kept confidential throughout and after the investigation and are only shared on a need-to-know basis.

Any employee is required to cooperate in the investigation of Reports if contacted in the course of such an investigation. Failure to cooperate with an investigation and the intentional false or misleading disclosure of information during an investigation may result in disciplinary action by NTTD, Inc. Group.

During the investigation, the investigator may interview alleged witnesses and/or the Reporter and collect all necessary information. Depending on the nature and severity of the alleged incident, NTTD, Inc. Group may or may not be required to refer the matter to a regulatory or law enforcement agency.

3.4. Decision and Feedback

Once the investigation is complete and after reviewing all findings, we will decide on an appropriate, fair, ethical and lawful course of action.

Where possible, you will be informed of the overall findings (i.e., whether unethical behaviour or misconduct has occurred) and, where permitted, any further actions to be taken and regular feedback will be provided regarding the progress of the matter.

Please note that we may not be able to give you full details of the outcome of a matter (or related actions taken) for reasons of confidentiality, privacy, and the legal rights of all concerned.

3.5. Appeal

If you are unsatisfied with the decision made specifically against you, or a decision that impacts you, in a particular case, that has been formally communicated to you upon closure of an investigation, you may raise an appeal against that decision against you. Appeals in relation to closed cases will be directed to the NTTD, Inc. Group CRO for consideration, who shall determine whether to consider the appeal on a discretionary basis.

Any appeal directed to the NTTD, Inc. Group CRO must be brought within 30 days of final feedback being provided to the Reporter by the Unit CRO.

Appendix A SpeakUp Contact Information

Please see the contact information for our online SpeakUp platform and local hotline numbers below both for employees and for clients, third parties and other stakeholders.

If your country is not provided in the list below, please use the general URL below.

General URL: <https://ntt.speakup.report/NTT>

Country	Phone instructions	Organization code
Angola	+244 226 425 610 Call charged at local rate	126375
Argentina	+54 11 2039 7280 Call charged at local rate	126375
Australia	+61 2 8284 6262 Call charged at local rate	126375
Austria	0800 909 683	126375
Belarus	8 820 0491 0089	126375
Belgium	0800 89 326	126375
Botswana	800 786 1103	126375
Brazil	+55 (11) 4700 8838 Call charged at local rate	126375
Bulgaria	008002100645	126375
Cambodia	1800 209 867	126375
Canada	+1 (514) 395 0496 Call charged at local rate	126375
Chile	+56 22 483 5917 Call charged at local rate	126375
China	400 120 1842 Call charged at local rate.	126375
Colombia	+57 601 242 1247 Call charged at local rate	126375
Czech Republic	800 050 833	126375
France	080 554 3753	126375
Germany	0800 1818 952	126375
Ghana	+233 59 699 3553 Call charged at local rate	126375
Hong Kong	+852 3019 4193 Call charged at local rate	126375
Hungary	06 809 845 89	126375
India	0008 0005 03159	126375
Indonesia	+62 21 8063 0074 Call charged at local rate	126375
Ireland	1800 800 636	126375

Italy	800 147 694	126375
Japan	+81 3 6627 0734 Call charged at local rate	126375
Kenya	+254 20 765 0957 Call charged at local rate	126375
S. Korea	+82 2 3700 5146 Call charged at local rate	126375
Laos	N/A	126375
Luxembourg	+352 342 080 8982 Call charged at local rate	126375
Macao	N/A	126375
Malaysia	+60 3 7724 3136 Call charged at local rate	126375
Mexico	+52 55 4780 6198 Call charged at local rate	126375
Mozambique	N/A	126375
Myanmar	0800 800 8062	126375
Namibia	+264 83 380 0103	126375
Netherlands	+31 10 700 75 03 Call charged at local rate	126375
New Zealand	+64 9 913 5892 Call charged at local rate	126375
Nigeria	070 8060 1221	126375
Norway	+47 24 14 06 01 Call charged at local rate	126375
Philippines	1800 8394 8474 Can only be connected by Globe Telecom device	126375
Poland	800012953	126375
Portugal	800 831 302	126375
Russia	8 (800) 100 69 94	126375
Saudi Arabia	800 850 1433	126375
Singapore	+65 6403 7051 Call charged at local rate	126375
Slovakia	0800 113 418	126375
South Africa	+27 (21) 427 7937 Call charged at local rate	126375
Spain	+34 900 031 156 Call charged at local rate	126375
Sweden	020 160 4703	126375
Switzerland	080 000 5691	126375
Taiwan	+886 2 7743 8912 Call charged at local rate	126375
Tanzania	0800 11 1020	126375

Thailand	+66 2 844 9693 Call charged at local rate	126375
Turkey	0080 04488 28602	126375
Uganda	+256 41 423 8162 Call charged at local rate	126375
Uruguay	000-413-598-5762	126375
United Arab Emirates	800 0444 0408	126375
United Kingdom	080 0022 4118	126375
United States	+1 (669) 288 7154 Call charged at local rate	126375
Vietnam	+84 1900 3271 Call charged at local rate	126375
Zambia	N/A	126375