

Sustainability Policy



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Table of Contents

1.	Introduction	4
2.	Purpose.....	4
3.	Scope.....	4
4.	Our strategy	5
5.	Principles of action	5
	Planet Positive	
	Prosperity Positive	
	People Positive	
6.	Commitments to our stakeholders	10
	Commitment to our employees	
	Commitment to our customers	
	Commitment to our shareholders and investors	
	Commitment to our suppliers	
	Commitment to regulatory bodies	
	Commitment to the media	
	Commitment to the environment and local communities	
7.	Communication and dialogue channels	12
8.	Relationship with other policies	12
9.	Monitoring system and oversight mechanisms	13

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1. Introduction

NTT DATA Spain S.L.U.'s sustainability policy is part of the company's commitment to sustainable development, meeting the needs and expectations of our stakeholders, and in line with our mission to accelerate our customers' success and make a positive impact on society through responsible innovation. This policy sets out our principles of action and commitments to our stakeholders in the area of corporate sustainability, as a guiding principle for how we conduct our business operations to ensure that our business model contributes to the creation of shared value and to a more prosperous and sustainable society.

2. Purpose

The purpose of this policy is to provide a legal framework on which to base the environmental, social and governance performance of NTT DATA Spain S.L.U., as well as to create long-term shared value, whilst meeting the needs and expectations of all stakeholders.

3. Scope

This policy applies to and is binding on all NTT DATA Spain S.L.U. group companies, and it extends to suppliers and business partners. Everyone therefore has a duty to be familiar with, understand and comply with the guidelines set out in this policy, particularly the executive team in their respective roles, so that they can extend these principles to all other levels of the organisation through practice, active promotion and monitoring compliance with the principles of action within their sphere of responsibility, integrating them into the way they think, speak and act.



4. Our strategy

NTT DATA's sustainability strategy is based on three key pillars:



Planet Positive: Leading by example to positively transform industries by innovating services and solutions that regenerate our planet.



Prosperity Positive: Transforming businesses and society so they can grow successfully through 100% sustainable services and solutions that span our entire value chain.



People Positive: Shaping a better world for everyone by applying our digital capabilities to improve people's livelihoods and contribute to a diverse, equitable and inclusive society.

Furthermore, as part of our commitment to a sustainable present and future, we are contributing to five of the 17 United Nations 2030 Agenda Sustainable Development Goals through innovation in corporate and business initiatives, specifically SDG 5 – gender equality, SDG 8 – decent work and economic growth, SDG 9 – industry, innovation and infrastructure, SDG 13 – climate action, and SDG 17 – partnerships for the goals.

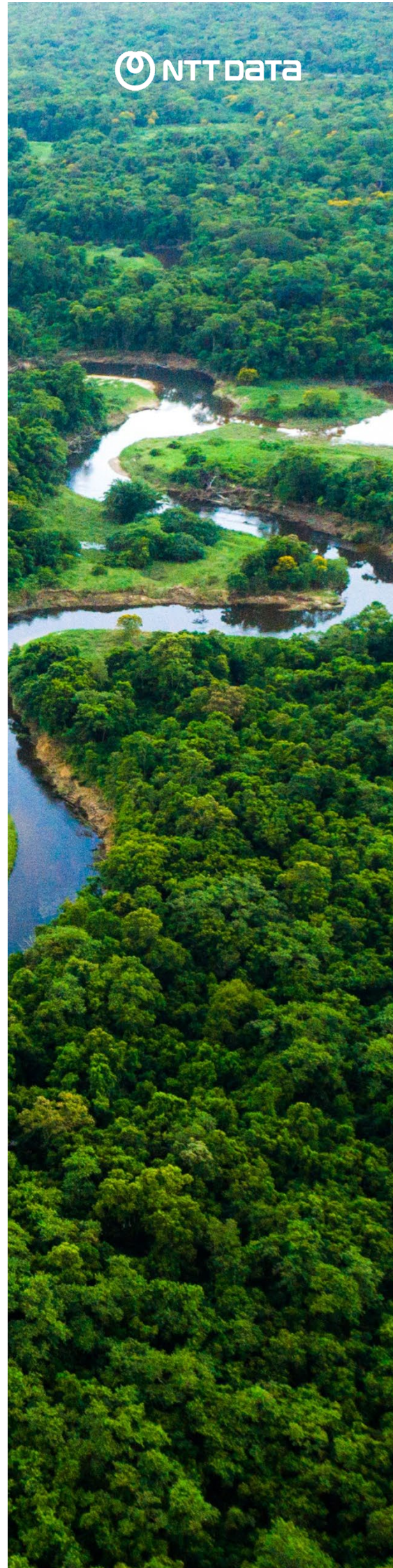
5. Principles of action

The following principles of action have been established to fulfil the purpose of this policy and achieve the objectives of our strategic plan for sustainable development:

- Promote the achievement of the United Nations 2030 Agenda for Sustainable Development and the Sustainable Development Goals (SDGs), particularly those that have an impact on our activities and the principles of the UN Global Compact, adopting and promoting the Compact.
- Review and incorporate sustainability-related impacts, opportunities and risks into the company's sustainability model, strategy and processes.
- Incorporate sustainability criteria into all the company's processes and decision-making, whilst providing stakeholders with the necessary tools to ensure this is the case.
- Publish our results annually through our economic, environmental and social performance indicators in accordance with the main reporting standards and regulations.

Planet Positive

- ✓ **Environmental performance:** Ensure the protection of and respect for the environment in all our activities, processes, products and services (Environmental and Energy Policy), as well as compliance with regulations and standards, and the attainment of environmental and energy management certifications (e.g. ISO 14001, ISO 50001, etc.).
- ✓ **Climate change:** Promote climate action by implementing mitigation and adaptation measures, and by reducing greenhouse gas emissions across our processes and value chain. Design accessible, eco-friendly solutions, helping our customers to also reduce their carbon footprint. NTT DATA is committed to achieving net-zero by 2040.
- ✓ Furthermore, promote a green and just energy transition, taking into account impacts and using technology available to achieve this in an orderly manner at the lowest possible cost to society.
- ✓ **Responsible use of resources:** Use the resources required to carry out our activities, processes, products and services (energy, water, paper, chemicals, electronic equipment, etc.) efficiently.
- ✓ **Circularity:** Commit to the circular economy, both in terms of reducing, reusing and recycling waste (paper, packaging, electronic equipment, etc.) and ensuring it is properly sorted and managed.
- ✓ **New technologies for minimising environmental impacts:** Promote innovation in new technologies, products, services and new ways of working (remote working, tools, etc.) to reduce environmental impacts, as well as to help our customers become more sustainable.
- ✓ **Sustainable mobility:** Support the public transport pass for commuting, as well as the use of electric taxis for work-related journeys, leasing electric vehicles and charging points at offices.
- ✓ **Environmental engagement and awareness:** Organise environmental awareness campaigns and courses, and participation and volunteering in projects aimed at protecting the environment and raising environmental awareness.



Prosperity Positive

- ✓ **Innovation through technology:** Transform ideas into valuable solutions through the responsible use of digital capabilities to drive growth and generate a positive and sustainable impact on society.
- ✓ **Responsible and ethical artificial intelligence technology:** Manage innovation and promote research and development into new products and services, enabling us to anticipate and incorporate artificial intelligence and other disruptive technologies in an ethical manner, as well as forge partnerships with customers, with the ultimate aim of achieving a market position that generates value for society and sets us apart from the competition.
- ✓ **Compliance:** Promote compliance with current legislation in jurisdictions where NTT DATA operates by adopting commitments, rules, recommendations and guidelines set out in international standards where there is no adequate or sufficient legal framework. Manage our day-to-day operations responsibly, guided by our corporate purpose, mission, vision and values, as well as the Group's compliance framework.
- ✓ **Preventing corruption and bribery:** Strengthen and ensure the resources required to implement the Global Anti-Corruption Policy and other measures in this area, alongside monitoring, awareness-raising, training and communication initiatives.
- ✓ **Digital security and reliability:** Ensure the protection of data and information, systems and operations through the responsible use of technology.
- ✓ **Secure and sustainable services and solutions by design:** Promote innovation in the design of products and services that support our customers and sustainable development, with a positive environmental and social impact that can be measured on project completion.
- ✓ **Sustainable procurement and supply chain:** Integrate sustainability principles into every stage of our procurement process so that our decisions promote practices that benefit the environment, the communities in which we operate and the entire supply chain.
- ✓ **Risk management:** Oversee and monitor overall risk management, minimising the potential impacts (economic, social and environmental) associated with NTT DATA activities, and ensuring the organisation responds effectively to emergencies and crises through contingency plans.
- ✓ **Information security and data protection:** Remain committed to protecting personal data in accordance with applicable regulations in each case and to the highest standards, such as those set out in the European Union General Data Protection Regulation (GDPR) and developments in information security technology.
- ✓ **Fiscal and financial responsibility:** Comply with tax obligations and promote policies that generate profit ensuring the group's financial stability and the company's long-term development, as well as comply with ESG indicators recommended by international bodies such as the Sustainable Accounting Standards Board (SASB) and the Task Force on Climate-

Related Financial Disclosures (TCFD).



People Positive

- ✓ **A people-centred company:** Promote well-being and human development, using their skills to create better opportunities and contribute to a more sustainable society.
- ✓ **Job creation:** Create stable, high-quality jobs.
- ✓ **Talent management:** Enhance employee skills and invest in a training programme that fosters their professional development and employability, as well as attract new professionals by partnering with academic institutions and associations.
- ✓ **Health and safety:** Ensure the highest standards of health and safety at work and protect the health of all Group staff.
- ✓ **Diversity and inclusion:** Guarantee equal opportunities, non-discrimination and the inclusion of people regardless of their race, culture, sexual orientation, religion, age, gender, disability or any other aspect of diversity.
- ✓ **Gender equality:** Maintain a balance in the equal representation of staff and encourage the appointment of women to positions of responsibility in order to reduce the gender gap.
- ✓ **Disability:** Integrate groups with different profiles and adapt workplaces to ensure universal accessibility.
- ✓ **Digital accessibility:** Implement initiatives that promote equitable access to digital knowledge, such as digital training aimed at women and other vulnerable groups, with a view to achieving digital inclusion and autonomy.
- ✓ **Remuneration policy:** Foster compliance with the relevant regulations and ensure fairness amongst employees in the same category and role or who carry out the same tasks.
- ✓ **Work-life balance, well-being and benefits:** Promote policies that enable a healthy work-life balance, flexible working hours and time off, remote working, improved legal provisions for parental leave, support for emotional and physical well-being, as well as the employee benefits that NTT DATA offers its staff.
- ✓ **Human Rights:** Ensure respect for and protection of human dignity and human rights throughout the supply chain and in relation to all our stakeholders by complying with the provisions of the Guiding Principles on Business and Human Rights in accordance with a strategy based on due diligence and international best practice.
- ✓ **Complaints channels:** Strengthen global complaints channels to report potential breaches confidentially and anonymously. This includes human rights violations, corruption, bribery or other illegal activities, such as workplace harassment. These channels are available to all NTT DATA employees and stakeholders.

6. Commitments to our stakeholders

With a view to upholding these principles of action, we have set out the following commitments to our stakeholders:

Commitment to our employees

Create stable, sustainable, high-quality employment in flexible working environments that foster innovation and the development of new products and services within diverse and dynamic settings, whilst promoting the recruitment, integration and development of talented professionals regardless of their race, gender or circumstances, on the basis of equal opportunities, with a particular focus on work-life balance and on the health, safety and well-being of the entire workforce.

Commitment to our customers

Develop products and services to the highest quality standards, which meet our customers' sustainability needs and exceed their expectations, whilst ensuring the utmost confidentiality of their data and in accordance with the Group's Code of Ethics and Professional Conduct.

Commitment to our shareholders and investors

Safeguard the right to transparency in information by disseminating information on Group activities and results that is appropriate, useful, reliable and accurate, thereby helping to ensure sound and independent governing bodies capable of making ethical, responsible, informed and sustainable decisions.

Commitment to our suppliers

Extend the principles of action of this policy to the company's entire supply chain, encouraging suppliers to uphold the highest standards of sustainability and ensure the best available practices are followed. NTT DATA will ensure fair and impartial treatment by always seeking to engage local suppliers and special employment centres, and by avoiding the use of suppliers who utilise conflictive materials or engage in unsustainable practices at any point in their value chain.

Commitment to regulatory bodies

Ensure compliance with applicable legislation in the countries where we operate and maintain an open and constructive dialogue with regulatory bodies, fostering collaboration on solutions that benefit society and fall within the remit of these bodies.

Commitment to the media

Ensure that media relations adhere to the principles of transparency, accuracy, honesty and cooperation, and that public information is always shared in a clear and transparent manner.

Commitment to the environment and local communities

Drawing on the talent of our professionals and driven by technology, develop initiatives that enable the sustainable development of the environments and communities in which NTT DATA operates. Furthermore, NTT DATA encourages its employees to get involved; they may voluntarily make financial contributions to charitable causes, as well as take part in the activities organised as part of the company's social and environmental initiatives.



7. Communication and dialogue channels

In accordance with the right to information as a fundamental and universal right, recognised in Article 19 of the Universal Declaration of Human Rights, NTT DATA takes a proactive approach to systematically listening to the needs and expectations of its stakeholders through a structured process based on various channels and tools for communication, participation and dialogue.

Main internal channels	Main external channels
- Doorways - Community Corporate Sustainability - Viva Engage - Communications to employees (newsletters, etc.) - Meetings and workshops - Opinion surveys - Training activities - Reporting channels or systems	- Websites - Sustainability Report - Press releases - Social media - Customer and supplier satisfaction surveys - Meetings and conferences - Newsletters and online engagement platforms - Telephone numbers and contact email addresses

8. Relationship with other policies

NTT DATA Spain S.L.U. has a set of standards that comply with current legislation and also aim to incorporate international best practices and recommendations on sustainability in order to achieve excellence. In this regard, this sustainability policy is complemented by NTT DATA's other internal regulations, and in particular by:

- Code of Ethics and Professional Conduct
- Global Anti-Corruption Policy
- Crime Prevention Policy
- Gifts and Hospitality Policy
- Environmental and Energy Policy
- Carbon Footprint Reduction Plan
- Guide to Good Environmental Practice
- Service Quality and Management Policy
- Diversity, Equity and Inclusion (DEI) Policy
- Equality Plan
- Policy on the Use of Generative Artificial Intelligence
- Human Rights Policy
- Procurement Policy
- Code of Conduct for Suppliers

9. Monitoring system and oversight mechanisms

The CEO for Iberia, International Organizations, LATAM & Consulting Benelux & France approved the NTT DATA Spain S.L.U. Sustainability Policy. Necessary measures will be taken to implement, develop, apply, monitor, control and review this policy. The Corporate Sustainability Department will continuously monitor compliance with the principles and guidelines set out in this policy, oversee the strategic plan and sustainability practices, and assess the extent to which these are being achieved, as well as the development of systems to monitor results and key performance indicators (KPIs) relating to sustainability, coordinating with and supporting all the company's management areas to ensure that sustainability is implemented across all NTT DATA Group operations.

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

June 2026

Miguel Teixeira

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



Antonio Gómez Jarillo

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



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

To accelerate client success and **positively** impact
society through responsible **innovation**

