



**Policy Statement**

# **Modern Slavery Statement**

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10 December 2019 | Document Version 0.01

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## Table of Contents

1.	Introduction.....	3
2.	Our organization’s structure .....	3
3.	Our Culture and Values.....	3
4.	Our business and supply chains .....	4
5.	Policies related to slavery and human trafficking .....	4
6.	Our due diligence process .....	4
7.	Training .....	5
8.	Human rights risk assessment .....	5
9.	Plans to strengthen our approach in the future .....	5



## 1. Introduction

This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015 (MSA) and constitutes the slavery and human trafficking statement of NTT Ltd ('NTT').

We are committed to improving our practices to combat slavery and human trafficking and are committed to ensuring that slavery and human trafficking are not taking place in our business operations.

## 2. Our organization's structure

NTT Ltd. is a global technology and services provider headquartered in London, United Kingdom, operating under the brand name NTT Ltd. We employ more than 40,000 employees across 57 countries, and deliver services in over 200 countries.

## 3. Our Culture and Values

In a dynamic, rapidly changing world, it's our people who are the heart and soul of our company and make everything happen.

Our people put our clients at the center of all we do, and use our global capabilities, and local insight, to help them achieve their ambitions.

We work to create a more sustainable, better world that helps our communities thrive.

We do the right thing, even when no one is watching.

We hold ourselves accountable, and empower our teams to take ownership, be more agile and see things through.

We find strength in diversity, and include everyone – together, we innovate better, so we welcome ideas from all.

We're here to learn and be curious as that's what keeps us fast, flexible and relevant – always ready to take bold steps into the future.

And we do all this while pursuing excellence and having fun.

Together we do great things.

This culture is supported by three values which guides how we behave and how we run our business. These are: *Speed, Execute and Together*.

We are guided by these to ensure we execute our strategy, and they are values we live every day, in addition to the three values of NTT Holdings of: *Integrity, Trust and Connect*.

Our foundation is built on our values and our continued success depends on our ability to make decisions that are consistent with these values. This means that we conduct our business in a socially responsible and ethical manner. We respect the law and our people, protect the environment, and benefit the communities in which we work.



## 4. Our business and supply chains

NTT and its group companies provide a wide range of global information and communications technology (ICT) solutions including cloud, network and security services. We are headquartered in London, United Kingdom. We are a wholly owned subsidiary of Nippon Telegraph and Telephone Corporation (NTT).

Through our business relationships with suppliers all over the world, we procure high quality services and products in an effective and timely manner, and, together with our suppliers, avoid forced labour and human trafficking in our supply chain.

## 5. Policies related to slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our policies have been updated and approved by the relevant parties and reflect our commitment to act with integrity and ethically in all our business relationships and to implement and enforce effective systems and controls, including in relation to combatting modern slavery and human trafficking in our supply chains.

We also have the Code of Business Conduct and Ethics (the Code) to strengthen our corporate ethics. Based on the Code, we have engaged in various measures to establish corporate ethics, including developing an organizational structure for compliance promotion and implementation of corporate ethics education for employees.

In addition to the Code we also have a whistleblowing policy that is intended to provide a process for and protection to our employees who wish to raise genuine concerns regarding amongst other things, our business practices. They can access our 24/7 independent, confidential reporting service at: [ntt@tip-offs.com](mailto:ntt@tip-offs.com)

## 6. Our due diligence processes and activities to prevent forced labour and human trafficking

### a) Organizational and management structure

Group Governance, Risk and Compliance are responsible for raising awareness of human rights and corporate ethics, which enables us to deal appropriately with reported issues on forced labour and human trafficking.

### b) Communication on policies and guidelines

The organization conducts annual surveys for all employees of our group companies regarding human rights and harassment at work, and their awareness of corporate ethics.



### **c) Supplier screening and contracts**

We are appraising a screening criterion before selecting new suppliers for business. Starting in the 2017 financial year, the organization have added CSR actions in the areas of human rights and labour, and have been making transaction decisions based on declarations from suppliers.

In addition, as part of our organization's effort to prevent slavery and human trafficking after transactions begin with suppliers, we select a number of major suppliers every year and conduct surveys to understand the extent our suppliers meet the expectations in the NTT guidelines for CSR in Supply Chain. The prevention of forced labour and human trafficking are included as questionnaire items.

## **7. Training**

We implement annual training programs for all employees, to raise awareness on and deepen understanding of human rights and compliance.

## **8. Human rights risk assessment**

In the 2019 financial year, our organization conducted assessment of potential human rights risks by taking into consideration NTT's business statuses and domains. The assessment was based on country risks and industry risks identified with the support of independent specialist organisations (CRT Japan and Verisk Maplecroft). Based on the assessment, we selected Asia as a region we should prioritise and established human rights challenges for each stakeholder.

## **9. Plans to strengthen our approach in the future**

Based on hypotheses obtained from the assessment on potential human rights risks, we plan to conduct, for the 2020 financial year and beyond, actual human rights impact assessment through interviews and stakeholder engagement.

Following up on the impact assessment, we will identify human rights topics that NTT should prioritize, and draw up and implement action plans for the identified human rights issues. We will deepen the collaboration with our suppliers to deal with any issues in our supply chain.

This statement was approved and signed by:

Sean Meisel

Senior Vice President, Risk and Governance