

Complaints Procedure NTT Germany AG & Co. KG – Rules of Procedure

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1. Complaints/Information Procedure of NTT Germany AG & Co. KG - Rules of Procedure

It is important that all our employees, customers, suppliers and third parties can raise concerns about suspected or actual unethical behaviour or misconduct in our business. This should be done without fear or threat of retaliation, and with the assurance that their concerns will be handled confidentially, fairly, ethically, and responsibly in accordance with applicable laws and regulations.

1.1. For what kind of complaints or indications is the procedure available?

- Risks or violations related to human rights and environmental protection, e.g., occupational safety, child & forced labour, inadequate wages, violation of land rights, soil/water/air pollution.
- In NTT Germany's business and within its supply chain.

1.2. Who may submit a complaint or a tip?

- Any person with knowledge of risks or grievances affecting NTT Germany's business or its suppliers.
- This includes, but is not limited to, NTT Germany's own employees, employees of business partners, customers, suppliers and third parties.

1.3. How can I submit a complaint or a tip?

- Complaints and tips can be submitted at any time in writing or by telephone via our confidential SpeakUp portal. All communication regarding your complaint or tip-off will take place exclusively via SpeakUp. No contact will be made outside SpeakUp.
- At www.speakupfeedback.eu/web/nttexternals you can select your country or language and submit your report either in writing or by telephone (using the country-specific telephone number).
- If you submit a SpeakUp report over the phone, make sure you pronounce it clearly and ideally spell out all names or places.
- Have a pen ready when you submit your report on our SpeakUp platform to write down your personal case number.

1.4. What should I consider when submitting a complaint or a tip?

1.4.1 What information should my message contain?

- What is the trigger for your complaint or tip? What risk or violation is it about?
- To what time or period does your complaint or tip refer?
- To which location does your complaint or information refer (e.g., in which country, at which company or which supplier)?
- Which persons are affected?

- Are there any witnesses or evidence to support your complaint or tip?
- Has the risk or violation already been reported?
- If yes: Where and when?
- If yes: Have measures already been taken to minimise or eliminate the risk or breach?

1.4.2 Your personal case number

- To be able to submit your complaint or tip anonymously, you will be given a personal six-digit case number which will be randomly generated. It is important that you write this number down and keep it safe, as you will need it to track the progress of your report and to provide additional information if necessary.
- You will be asked to enter this number every time you access the SpeakUp platform.

2. What happens after I submit my complaint or tip?

2.1. When will I receive feedback?

- As soon as you have submitted your report, it will be translated if necessary and we will confirm receipt of your report within seven working days. At this time, we will also let you know how much time we will need to process and assess your request.
- In some cases, we may need further information from you to respond to your report and will contact you for further information.
- The length of an investigation will depend on the circumstances of the case, including the number of allegations, witnesses, and other factors. We will aim to provide a response within 3 months.

2.1.1 Who is responsible for investigating my complaint or tip-off?

- The Governance, Risk & Compliance department is responsible for investigating your complaint or tip-off.

2.1.2 How will my complaint or tip be investigated?

- We will check your tip and contact you via the SpeakUp portal if we need further information on the facts of the case.
- The discussion of the facts takes place both with you as the whistleblower and with other parties involved (e.g., accused persons, internal departments).
- If the tip-off is confirmed, the development of a proposal for a solution or so-called remedial measures begins with the parties involved. You will either be directly involved (while maintaining your anonymity) or notified of a possible solution.

2.1.3 What is a possible outcome?

- If your complaint or tip-off is confirmed, remedial action will be developed and implemented. Finally, there will be an effectiveness review of the measures taken.
- If your complaint or tip-off is not confirmed, the process ends, and we will inform you of this.
- At the end of the complaint and tip-off process, we contact you again to evaluate the outcome.

3. How are whistleblowers protected?

3.1. Anonymity: Can complaints or tips be submitted anonymously?

- Yes, our whistleblowing platform SpeakUp allows complaints and tips to be submitted completely anonymously.
- You can choose to remain anonymous or to reveal your identity at the time of reporting (or afterwards).
- Our SpeakUp platform always preserves your anonymity, unless you choose to share your identity in your report. Your report will be identified by a unique case number which will be provided to you at the time of the report.

3.2. Confidentiality

- Regardless of whether you submit your tip or complaint anonymously, we keep all reports confidential and only share information about SpeakUp reports on a strict need-to-know basis.

3.3. Data protection

- We are committed to ensuring that personal data processed for the purpose of reporting and responding to complaints and tips is processed in a transparent and lawful manner.
- Personal data processed for the purpose of reporting and responding to complaints and notices will be kept confidential and will only be used for the purposes described in these Rules and/or to comply with applicable laws and regulations and/or in the public interest.
- In the course of making your report and/or responding to your report, personal data may be transferred across borders (i.e. outside the country where the complaint or tip was made).
- Our SpeakUp platform is hosted in the Netherlands and supported by translators working in countries with an adequate level of protection.

