



Group Policy

SpeakUp Policy

NTT Limited

Specific version for NTT Italia S.p.A.

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Governance, Risk and Compliance

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1. Introduction

NTT Ltd. and all its subsidiaries and affiliates ('NTT', 'we', 'us', 'our') want to create an ethical culture that empowers our people to do the right thing and feel comfortable to SpeakUp when they see any misconduct in our business – we do the right thing, even when no one is watching.

It is essential that all our people, clients, third parties and communities are given the opportunity to SpeakUp and raise any concerns about suspected or actual unethical behaviour or misconduct in our business, without fear or threat of retaliation, and are confident in the knowledge that their concerns will be treated confidentially, fairly, ethically, and responsibly in accordance with applicable laws and regulations.

We each have a duty to SpeakUp promptly if we know or suspect that anyone in our business has violated our Code of Conduct and Business Ethics ('our Code'), policies, applicable laws and regulations, or are acting in a way that is not in keeping with our values.

Amongst others, concerns that should be raised under our SpeakUp Policy ('this Policy') include, but are not limited to:

- Breaches of our Code and values
- Health and safety concerns
- Violations of any of our policies
- Human rights violations
- Violations of applicable laws and regulations
- Discrimination, bullying or harassment
- Criminal activity or offences (e.g., theft, violence, damage against property)
- Environmental issues
- Fraud, bribery, money laundering, terrorist financing, insider trading or other corrupt practices
- Financial misstatements or irregularities and/or the provision of inaccurate or misleading information
- Anti-competitive behaviour or trade practices
- Unacceptable use of information assets and/or bypassing information security controls
- Conflicts of interest
- Disclosure or improper use of confidential information
- Violations of sanctions and export and import controls
- Unethical or unlawful processing of personal data
- Improper procurement and sourcing practices
- Violations of intellectual property, trademarks, or copyrights
- Retaliation against anyone who speaks-up

We operate a strict non-retaliation policy for all reports made in good faith, meaning that any act or threat of retaliation for reporting concerns (such as dismissing, transferring, demoting or publicly attacking someone) will not be tolerated.

SpeakUp Policy

Risk and Sustainability | Integrity and Business Conduct

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

Specific provisions for Italy

This version of the NTT Ltd Group SpeakUp Policy has been amended to incorporate provisions set out in the Italian Legislative Decree 24/2023.

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 by empowering our people, clients, third parties and communities to SpeakUp;
- encourage our people, clients, third parties and communities 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 responding to reports in a confidential, fair, ethical, responsible, and compliant way;
- assign roles and responsibilities for responding to reports across our business operations; and
- demonstrate our commitment to complying with applicable whistleblowing laws and regulations

1.2. Scope

This Policy applies to anyone who wishes to raise any concerns about actual or suspected unethical behaviour or misconduct within our business and/or is responsible for responding to reports, including:

- all our people (including current, prior, and future employees, contractors, trainees, directors, and shareholders of NTT)
- our clients and any representatives thereof
- our third parties (including all suppliers, vendors, service providers, consultants, and partners) and any representatives thereof
- any other person who wishes to raise a report

1.3. Non-Compliance with the SpeakUp Policy

Any employee who fails to comply with this Policy may be subject to disciplinary action up to, and including dismissal.

1.4. Local Variations and Exceptions

Our 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 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 reported to and reviewed by Group Risk and Sustainability and formally recorded in an addendum to this Policy.

1.5. Training

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

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

Our people will receive mandatory annual training on this Policy, related policies, controls, and practices, and where they may go to make a SpeakUp report. In particular, all new employees will be required to complete mandatory training on this Policy during induction.

Individuals responsible for responding to reports and/or performing investigations must be professionally 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.

1.6. Audit and Compliance

The design, implementation and operating effectiveness of this Policy and its associated controls is subject to ongoing monitoring, review, and audit through the performance of periodic self-assessments, compliance assessments and independent audits (including internal and external audit). Where required, updates and/or improvements to this Policy will be made based on the observations or findings of the self-assessments, compliance assessments and audits.

Compliance with this Policy is monitored on a periodic basis and reported to the NTT Ltd. Board, Group Audit and Risk Committee, Group Risk and Compliance Committee and senior management.

1.7. Continual Improvement

This Policy is subject to continual review and improvement and will be reviewed by Group Risk and Sustainability at least annually.

2. Roles and Responsibilities

This Policy is governed, supported and implemented by the following roles within NTT.

NTT Ltd. Board	<ul style="list-style-type: none"> • Ultimately accountable for the oversight, implementation and enforcement of this Policy and compliance with applicable whistleblowing laws and regulations. • Ensure that NTT is committed to values of transparency, ethics, and integrity. • Ensure that our culture reflects our values and lives up to our Code. • Ensure that our organizational structures, systems, and management approaches empower our people, clients, third parties and communities to SpeakUp without fear or threat of retaliation. • Maintain the confidentiality of all reports and only share information relating to these reports on a need-to-know basis. • Maintain and enforce a strict non-retaliation policy for individuals who SpeakUp in good faith.
Group Audit and Risk Committee	<ul style="list-style-type: none"> • Ultimately accountable for the oversight and implementation of the Risk Management Framework and Policy. • Maintain the confidentiality of all reports and only share information relating to these reports on a need-to-know basis. • Approve this Policy and any material local deviations, exceptions, or variations, where required.
Senior Vice President, Group Risk	<ul style="list-style-type: none"> • Owner of this Policy and responsible for the periodic review and update of this Policy. • Maintain the confidentiality of all reports and only share information relating to these reports on a need-to-know basis. • Where investigations are required, identify, and appoint the appropriate personnel and/or third party to investigate reports. • Support in response to reports where required by: <ul style="list-style-type: none"> ○ assisting individuals to make a SpeakUp report by directing them to our SpeakUp platform or submitting a report on their behalf; ○ seeking clarification or further information from individuals about their report; ○ providing feedback to individuals about the actions taken in response to their report; ○ assessing the accuracy of the report and, where required, take action to address the report

(including internal enquiries, investigations, prosecutions, recovery of funds, disciplinary proceedings, reports to internal or external stakeholders, public disclosures); and

- maintaining an auditable record of and documentation relating to the report that describes all actions taken to respond and outcomes.
- Review and approve all external reports (e.g., reports to relevant institutions, bodies, offices, authorities, etc.) and/or public disclosures, where required, prior to dissemination.

Group Risk and Sustainability

- Responsible for providing oversight and ensuring the effective management of the Integrity and Business Conduct programme.
 - Provide regular statistical reporting to NTT DATA Group, of reports made in the financial year.
 - Provide quarterly, statistical reporting to Group Audit and Risk Committee.
 - Maintain the confidentiality of all reports of which they are made aware and only share information relating to these reports on a need-to-know basis.
 - Monitor reports, identify trends, and respond to unethical behaviour or misconduct in the business through the implementation of appropriate measures.
 - Ensure that adequate processes and systems are in place to ensure the confidentiality of reports and that responses to reports are performed in a fair and ethical way.
 - Support in our response to reports where required by:
 - assisting individuals to make a SpeakUp report by directing them to our SpeakUp platform or submitting a report on their behalf;
 - seeking clarification or further information from individuals about their report;
 - providing feedback to individuals about the actions taken to respond to their report;
 - assessing the balance of probability of the report and, where required, take action to address the report (including internal enquiries, investigations, prosecutions, recovery of funds, disciplinary proceedings, reports to internal or external stakeholders, public disclosures); and
 - maintaining an auditable record of and documentation relating to the report that describes all actions taken to respond and outcomes.
 - Enforce non-compliance with this Policy, in line with privacy and confidentiality guidelines..
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	<ul style="list-style-type: none"> • Ensure that our people are aware of this Policy and are provided with adequate training based on their role.
Integrity and Business Conduct Forum	<ul style="list-style-type: none"> • Manage the Integrity and Business Conduct Principal Risk and ensure that relevant policies, processes, frameworks, standards, and training are in place to support implementation in the business. • Ensure the adoption of and effective implementation of this Policy throughout the business. • Provide input and advise on any improvements that may be made to this Policy and associated controls in the business. • Communicate with executives and senior management about this Policy and associated controls. • Discuss and share SpeakUp trends and responses to unethical behaviour or misconduct in the business.
Group Legal	<ul style="list-style-type: none"> • Monitor regulatory changes that may impact this Policy and provide input into this Policy to ensure that it meets our legal obligations and is compliant with the relevant whistleblowing laws and regulations that apply to NTT. • Provide legal support and advice in our response to reports, including where necessary engaging appropriate outside legal counsel. • Maintain the confidentiality of all reports of which they are made aware and only share information relating to these reports on a need-to-know basis.
Regional / Services CEOs	<ul style="list-style-type: none"> • Accountable for ensuring that this Policy is implemented within their area of the business. • Provide management oversight over the implementation of this Policy in their area of the business. • Ensure that the organizational structures, systems, and management approaches empower our people, clients, third parties and communities to SpeakUp without fear or threat of retaliation in their area of the business. • Maintain the confidentiality of all reports of which they are made aware in their area of the business and only share information relating to these reports on a need-to-know basis. • Maintain and enforce a strict non-retaliation policy for individuals who SpeakUp in good faith in their area of the business. • Review and approve all external reports (e.g., reports to relevant institutions, bodies, offices, authorities, etc.) and/or public disclosures, where required, prior to dissemination for their area of the business.

**Regional / Services
Risk Managers /
Legal Counsel**

- Review this Policy and identify any local variations, additional requirements and/or exceptions that may be required to support compliance with local laws and regulations.
- Create sub-policies, processes, standards, guidance, or training to support the implementation of local variations, additional requirements and/or exceptions.
- Monitor the design, implementation and operating effectiveness of this Policy and its associated controls within their area of the business.
- Maintain the confidentiality of all reports of which they are made aware in their area of the business and only share information relating to these reports on a need-to-know basis.
- Support in our response to reports in their area of responsibility and where required by:
 - assisting individuals to make a SpeakUp report by directing them to our SpeakUp platform or submitting a report on their behalf;
 - seeking clarification or further information from individuals about their report;
 - providing feedback to individuals about the actions taken to respond to their report;
 - assessing the accuracy of the report and, where required, take action to address the report (including internal enquiries, investigations, prosecutions, recovery of funds, disciplinary proceedings, reports to internal or external stakeholders, public disclosures); and
 - maintaining an auditable record of and documentation relating to the report that describes all actions taken to respond and outcomes.

**Regional / Services
Human Resource
Directors**

- Maintain the confidentiality of all reports of which they are made aware in their area of the business and only share information relating to these reports on a need-to-know basis.
- Support in our response to reports in their area of responsibility and where required by:
 - assisting individuals to make a SpeakUp report by directing them to our SpeakUp platform or submitting a report on their behalf;
 - seeking clarification or further information from individuals about their report;
 - providing feedback to individuals about the actions taken to respond to their report;
 - In collaboration with Regional / Services Risk Managers, assessing the accuracy of the report and, where required, take action to address the

report (including internal enquiries, investigations, prosecutions, recovery of funds, disciplinary proceedings, reports to internal or external stakeholders, public disclosures); and

- maintaining an auditable record of and documentation relating to the report that describes all actions taken to respond and outcomes.

Our people and third parties

- Responsible for ensuring that they have read, understood and adhere to this Policy.
- SpeakUp when they know or suspect any unethical behaviour or misconduct in the business, in accordance with this Policy.
- Make SpeakUp reports in good faith.
- Assist NTT in responding to SpeakUp reports by providing, to the best of their knowledge, information that is honest, accurate and sufficiently detailed so that we may effectively respond to the report (who, what, when, how).

Do not take any actions to circumvent this Policy and its associated controls.

Comitato di gestione delle segnalazioni

- The "Comitato di gestione delle segnalazioni" is provided by the Italian Legislative Decree no. 24/2023, according to EU Directive no. 2019/1937 and such "Comitato" is in charge to manage a complaint/record under the above mentioned Decree.
- The Comitato will only manage complaints that fall under the Comitato's scope of jurisdiction, as set out in Legislative Decree no 24/2023,
- The Comitato will maintain the confidentiality of all reports of which they are made aware and only share information relating to these reports on a need-to-know basis.

3. Speaking-Up

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

3.1. 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.

At all times SpeakUp reports 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.

3.2. Anonymity

You can choose to remain anonymous or to share your identity at the time of (or after) making a report.

Our SpeakUp platform maintains your anonymity at all times, unless you choose to share your identity with us in 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 identify 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 (e.g., relevant authorities) in order to effectively respond to your report and such disclosure is necessary and proportionate, we will notify you in advance to such disclosure.

3.3. 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. Our [Data Privacy and Protection Policy](#) describes our minimum requirements for processing personal data and ensuring that we comply with applicable data protection laws and regulations.

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/or to comply with applicable laws and regulations and/or in the public interest.

Personal data is processed in our legitimate interests to detect unethical behaviour and misconduct and enforce an ethical culture that is aligned to our Code and corporate values. In addition, personal data may be processed in order for us to comply with an obligation under applicable laws and regulations that requires us to implement whistleblowing processes and systems, amongst others.

During the course of making your report and/or the response to your report, personal data may be transferred across borders (i.e., outside of the country where the report was made). Our SpeakUp platform is hosted in the Netherlands and supported by translators operating in countries with adequate levels of protection. Personal data may also be shared with authorized personnel within your company, country, region, or NTT group companies for the purposes of responding to your report, monitoring reports and trends, and oversight of this Policy and related policies. Such transfers are subject to adequate safeguards for the protection of personal data in third countries. Where required, personal data may also be shared with third parties, who have adequate technical and organizational measures and contracts are in place, for the purposes of providing support in our response to SpeakUp reports.

We are committed to upholding individual's rights ('**Data Subject Rights**') to be informed, access, rectify, delete (i.e., right to be forgotten), restrict processing, object to and lodge a complaint in respect of their personal data. All data subject requests will be reviewed on a case-by-case basis and responded to in accordance with our [Data Subject Rights Policy](#) and [Data Subject Requests Process](#).

3.4. Particular types of reporting

If a telephone line is used for reporting registered or other registered voice messaging system, the reporting, with your prior consent, is documented by the personnel in charge, by recording on a device suitable for storage and listening or through full transcription. In case of transcription, you can verify, rectify, or confirm the content of the transcription through his signature provided that you have identified yourself in the report.

If an unregistered telephone line is used for reporting or another unregistered voice messaging system is used, your report is documented in writing and will contain details of the conversation by the relevant person in charge. You can verify, rectify, and confirm the contents of the transcript through your signature, provided that you have identified yourself in the report.

When, at your request, the report is carried out orally during a meeting with the staff of the entity specifically identified, with your prior consent of, the meeting is documented by the person in charge by recording on a device suitable for storage and listening or through a written report. In the case of a written report, you can verify, rectify and confirm the text with your own subscription.

3.5. 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.

When making a report ensure that you exercise due care to provide honest, accurate and sufficient information so that we may effectively respond to your report (who, what, when, how).

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

If the report turns out to be defamatory, or in any case proves to be unfounded and was made with malice or gross negligence, the person making the report would be liable for the declarations contained in the report.

3.6. Non-Retaliation

We have a strict non-retaliation policy and will not tolerate any harassment or victimization towards anyone for speaking-up. 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.

If you notice any form of retaliation against you or 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.

3.6.1 Specific provisions for Italy

The Non- retaliation protection measures apply in favor of whistleblower when the following conditions apply:

- a) at the time of the report, the whistleblower had reasonable grounds to believe that the information on the reported violations was true and fell within the scope of this procedure;
- b) the report was made in compliance with the conditions, methods and forms envisaged and referred to in this procedure.

Any whistleblower who has reported a matter in compliance with the conditions established in the present procedure cannot suffer acts of retaliation, which are, therefore, expressly prohibited.

For these purposes, the following are considered acts of retaliation:

- dismissal, suspension or equivalent measures;
- demotion or failure to promote;
- change of functions, change of place of work, reduction of salary, modification of working hours;
- the suspension of the training or any restriction on access to it;
- negative merit notes or negative references;
- the adoption of disciplinary measures or other sanctions, including pecuniary,
- coercion, intimidation, harassment and ostracism;
- discrimination or in any case unfavorable treatment;
- the failure to convert a fixed-term employment contract into a permanent employment contract, where the worker had a legitimate expectation of such conversion;
- failure to renew or early termination of a fixed-term employment contract;
- the early termination or cancellation of the contract for the supply of goods or services;

- the cancellation of a license or permit;
- the request to undergo psychiatric or medical tests.

3.7. Recordkeeping

All reports received in accordance with this Policy, must be recorded either in our SpeakUp platform, Group Risk and Sustainability and/ or the investigating Region or Services Risk Manager.

In accordance with the Italian legislation (therefore it is only applicable in Italy), all whistleblowing matters, both internal and external, and the related documentation are kept for the time necessary for processing of the report and in any case no later than five years from date of communication of the final outcome of the procedure whistleblowing, in compliance with the confidentiality obligations referred to Article 12 of the Italian Legislative Decree no. 24/2023 and the principle referred to in the Articles 5(1)(e) of Regulation (EU) 2016/679 and 3, paragraph 1, letter e), of Italian Legislative Decree no. 51/2018. Where records are maintained for a period of more than five years from the date of communication of the final outcome, such records such have restricted access and shall be archived so that any further processing or access to such records shall not be possible.

All reports must include the following documentation:

- the original report made by the individual without modification;
- all correspondence and communications with the individual regarding their report (including any verbal, telephonic or virtual communications);
- any evidence obtained from the individual or during further enquiry or investigation by authorized personnel or third parties; and
- meeting minutes and evidence of any decisions and actions taken to respond to the report.

4. SpeakUp Process

All reports will follow the SpeakUp process outlined below.

4.1. 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 all our people, 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.

4.1.1 Available SpeakUp channels for our people

There are several channels available to our people to make a report, including:

- Your line manager;
- Your local HR team or representative;
- Your local Risk Manager or Legal counsel;
- Group Risk and Sustainability by sending an email to: business.conduct@global.ntt; and
- Our 24/7 anonymous and confidential SpeakUp platform, as follows:



Online at: www.speakupfeedback.eu/web/ntt

You may also make a report on your country specific website by using the relevant URL outlined in Appendix A of this Policy. Links to our SpeakUp platform are also available in relevant policies and on our NTT Intranet sites.



Over the phone by dialing your country specific number outlined in Appendix A to 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 receive a personal six-digit case number, which is randomly generated. 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.

We encourage you to discuss the matter with your line manager in the first instance. If you do not feel comfortable doing so, you can also speak to your local HR team or representative.

All reports must be recorded in our SpeakUp platform. Where reports are made to line managers, local HR teams or representatives, Risk Managers or Legal counsel, or Group Risk and Sustainability, the individual or team receiving the report must record the report in SpeakUp without modification.

You can also make a report via our **NTT Group-wide Corporate Ethics Help Line:**

By Email: NTTDATA_whistleline@ogaso.com

4.1.2 Specific provisions for Italy

In Italy, a report can be made

- 1) Internally, either through the NTT reporting channels set out in 4.1.1 above, or directly to the “Italian supervisory body 231”¹.

Where the report is sent to the Italian supervisory body:

- The report will be received and managed by the specifically identified entity, named “Comitato di gestione delle segnalazioni” (“Comitato”);
 - The Comitato will communicate the information contained in the “internal report” respecting the confidentiality and other rights of the reporter
 - The Comitato will communicate internally to managers, local HR teams or representatives, Governance, Risk and Compliance teams or Legal counsel, or Group Governance, Risk and Compliance, as is appropriate and as required by internal NTT Policies
 - NTT will fully co-operate with the Comitato in line with legal obligations and internal Policies and at the advice of Group Risk and Group Legal. All requests from the Comitato must be directed to Group Risk and any information provided by NTT to the Comitato must first be approved by Group Risk.
- 2) Externally to the Anti-Bribery National Authority (“ANAC”) by following this link: <https://www.anticorruzione.it/-/whistleblowing>.

You will proceed with an external report only where you cannot proceed with an internal report and in particular when

- ✓ the reporting person has already made an internal report and the same has not been followed up [article 6, paragraph 1, letter b), Legislative Decree no. 24/2023];
- ✓ the reporting person has reasonable grounds to believe that if he or she made an internal report, the report would not be followed up effective follow-up or that the same report may result in the risk of retaliation [article 6, paragraph 1, letter c) Legislative Decree no. 24/2023];
- ✓ the reporting person has reasonable grounds to believe that the violation may pose an imminent or obvious danger to the public interest [article 6, paragraph 1, letter d) Legislative Decree no. 24/2023].

The identity of the *reporter* and any other information from which a person's identity can be deduced, directly or indirectly, cannot be revealed without consent expressed by the same reporting person, to people other than those competent to receive or follow up on reports *or the reporter*, or to process such data pursuant to Articles 29 and 32(4) of Regulation (EU) 2016/679 and of Article 2-*quaterdecies* of the legislative decree 30 June 2003, n. 196.

¹ Following the provisions of the Article 6, par. 1, lett. b), Italian legislative decree 231/2001.

4.1.3 Available SpeakUp channels for our clients, third parties and other stakeholders

Our clients, third parties and other stakeholders may make a report at any time through our anonymous and confidential, 24/7 SpeakUp platform, as follows:



Online at: www.speakupfeedback.eu/web/nttexternals

You may also make a report on your country specific website by using the relevant URL outlined in Appendix A of this Policy. Links to our SpeakUp platform are also available on our websites.



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 receive a personal six-digit case number, which is randomly generated. 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.

4.2. Acknowledgment

Once you have submitted your report your report will be translated, if required, and we will acknowledge receipt of your report within seven working 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.

4.3. Review and Action

Once we have all the initial information, we need to understand your report, 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 will be performed in accordance with our Investigations Policy. Depending on the nature and severity of the report, investigations may be performed internally by trained, authorized and independent personnel or by independent third parties. The Senior Vice President, Group Risk will identify and appoint the appropriate personnel or third party to perform the investigation, if required.

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 who have been adequately trained. 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 endeavor to provide feedback within a timeframe of 3 months.

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.

4.4. Decision and Feedback

Once the investigation is complete and after reviewing all findings of any actions taken, 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 behavior 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.

You will receive feedback on the report within three months from the date of the acknowledgment of receipt or, in the absence of such notice, within three months from the expiry of the seven-day period from the submission of the report.

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.

Appendix A SpeakUp Contact Information

Please see the contact information for our online SpeakUp platform and local hotline numbers below.

For our people

The contact information below must be used by our people when making a SpeakUp report.

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

General URL: www.speakupfeedback.eu/web/ntt

Country	Phone Instruction	Webservice URL	Access code
Angola	N/A	www.speakupfeedback.eu/web/ntt/ai	80185
Argentina	08006660078	www.speakupfeedback.eu/web/ntt/ar	80185
Australia	1800452051	www.speakupfeedback.eu/web/ntt/au	80185
Austria	0800-295175	www.speakupfeedback.eu/web/ntt/at	80185
Belarus	882000730010	www.speakupfeedback.eu/web/ntt/by	80185
Belgium	0800-71365	www.speakupfeedback.eu/web/ntt/be	80185
Botswana	0026 9800 3003128	www.speakupfeedback.eu/web/ntt/bw	80185
Brazil	08008919678	www.speakupfeedback.eu/web/ntt/br	80185
Cambodia	1800208759	www.speakupfeedback.eu/web/ntt/kh	80185
Canada	1-866-8181239	www.speakupfeedback.eu/web/ntt/ca	80185
Chile	12300202775	www.speakupfeedback.eu/web/ntt/cl	80185
China	4009901434 If you are calling with provider Unicom: 108007440179 If you are calling with provider Telecom (landline only): 108004400179	www.speakupfeedback.eu/web/ntt/cn	80185
Colombia	018009440692	www.speakupfeedback.eu/web/ntt/co	80185
Czech Republic	800 900 538	www.speakupfeedback.eu/web/ntt/cz	80185
France	0800-908810	www.speakupfeedback.eu/web/ntt/fr	80185
Germany	0800-1801733	www.speakupfeedback.eu/web/ntt/de	80185
Ghana	0-2424-26-004 Wait for the tone or instructions, and then dial: 888-799-0983	www.speakupfeedback.eu/web/ntt/gh	80185
Hong Kong Sar, Greater China	800963161	www.speakupfeedback.eu/web/ntt/hk	80185
Hungary	0680981359	www.speakupfeedback.eu/web/ntt/hu	80185
India	0008004401221	www.speakupfeedback.eu/web/ntt/in	80185
Indonesia	If you are calling with provider Indosat: 001 803 440 559 If you are calling with provider Telkom: 007 803 440 559	www.speakupfeedback.eu/web/ntt/id	80185

Ireland	1800-552136	www.speakupfeedback.eu/web/ntt/ie	80185
Italy	800-787639	www.speakupfeedback.eu/web/ntt/it	80185
Japan	0120 774878	www.speakupfeedback.eu/web/ntt/jp	80185
Kenya	0800733255	www.speakupfeedback.eu/web/ntt/ke	80185
Korea (South)	007984424261	www.speakupfeedback.eu/web/ntt/kr	80185
Laos	N/A	www.speakupfeedback.eu/web/ntt/la	80185
Luxembourg	800-21048	www.speakupfeedback.eu/web/ntt/lu	80185
Macao	N/A	www.speakupfeedback.eu/web/ntt/mo	80185
Malaysia	1-800-88-4307	www.speakupfeedback.eu/web/ntt/my	80185
Mexico	8001234618	www.speakupfeedback.eu/web/ntt/mx	80185
Mozambique	N/A	www.speakupfeedback.eu/web/ntt/mz	80185
Myanmar	MPT: 0800 800 8025	www.speakupfeedback.eu/web/ntt/mm	80185
Namibia	N/A	www.speakupfeedback.eu/web/ntt/na	80185
Netherlands	0800 0222931	www.speakupfeedback.eu/web/ntt/nl	80185
New Zealand	0800450436	www.speakupfeedback.eu/web/ntt/nz	80185
Nigeria	07080601488	www.speakupfeedback.eu/web/ntt/ne	80185
Norway	800-18333	www.speakupfeedback.eu/web/ntt/no	80185
Philippines	1800 1441 0215	www.speakupfeedback.eu/web/ntt/ph	80185
Poland	008004411739	www.speakupfeedback.eu/web/ntt/pl	80185
Portugal	800-831528	www.speakupfeedback.eu/web/ntt/pt	80185
Russia	810 800 2626 9902	www.speakupfeedback.eu/web/ntt/ru	80185
Saudi Arabia	8008442726	www.speakupfeedback.eu/web/ntt/sa	80185
Singapore	1800-8232206	www.speakupfeedback.eu/web/ntt/sg	80185
Slovakia	0800004529	www.speakupfeedback.eu/web/ntt/sk	80185
South Africa	0800991526	www.speakupfeedback.eu/web/ntt/za	80185
Spain	900-973174	www.speakupfeedback.eu/web/ntt/es	80185
Sweden	020-798813	www.speakupfeedback.eu/web/ntt/se	80185
Switzerland	0800-561422	www.speakupfeedback.eu/web/ntt/ch	80185
Taiwan, Greater China	00801444317	www.speakupfeedback.eu/web/ntt/tw	80185
Tanzania	0808 11 0106	www.speakupfeedback.eu/web/ntt/tz	80185
Thailand	001800 441 4284	www.speakupfeedback.eu/web/ntt/th	80185
Turkey	00800 448824369	www.speakupfeedback.eu/web/ntt/tr	80185
Uganda	N/A	www.speakupfeedback.eu/web/ntt/ug	80185
United Arab Emirates	80004412727	www.speakupfeedback.eu/web/ntt/ae	80185
United Kingdom	0800-1693502	www.speakupfeedback.eu/web/ntt/gb	80185
United States	1-866-2506706	www.speakupfeedback.eu/web/ntt/us	80185
Vietnam	Viettel: 12280319 VPNT / Vinaphone: 120852140 Mobifone: 121020030	www.speakupfeedback.eu/web/ntt/vn	80185
Zambia	N/A	www.speakupfeedback.eu/web/ntt/zm	80185

[For our clients, third parties and other external stakeholders](#)

The contact information below must be used by our clients, third parties (including partners, suppliers, vendors, service providers, joint ventures) and other external stakeholders when making a SpeakUp report.

Information Asset Classification: General

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

General URL: www.speakupfeedback.eu/web/nttexternals

Country	Phone Instruction	Webservice URL	Access code
Angola	N/A	www.speakupfeedback.eu/web/nttexternals/ai	74520
Argentina	08006660078	www.speakupfeedback.eu/web/nttexternals/ar	74520
Australia	1800452051	www.speakupfeedback.eu/web/nttexternals/au	74520
Austria	0800-295175	www.speakupfeedback.eu/web/nttexternals/at	74520
Belarus	882000730010	www.speakupfeedback.eu/web/nttexternals/by	74520
Belgium	0800-71365	www.speakupfeedback.eu/web/nttexternals/be	74520
Botswana	0026 9800 3003128	www.speakupfeedback.eu/web/nttexternals/bw	74520
Brazil	08008919678	www.speakupfeedback.eu/web/nttexternals/br	74520
Cambodia	1800208759	www.speakupfeedback.eu/web/nttexternals/kh	74520
Canada	1-866-8181239	www.speakupfeedback.eu/web/nttexternals/ca	74520
Chile	12300202775	www.speakupfeedback.eu/web/nttexternals/cl	74520
China	4009901434 If you are calling with provider Unicom: 108007440179 If you are calling with provider Telecom (landline only): 108004400179	www.speakupfeedback.eu/web/nttexternals/cn	74520
Colombia	018009440692	www.speakupfeedback.eu/web/nttexternals/co	74520
Czech Republic	800 900 538	www.speakupfeedback.eu/web/nttexternals/cz	74520
France	0800-908810	www.speakupfeedback.eu/web/nttexternals/fr	74520
Germany	0800-1801733	www.speakupfeedback.eu/web/nttexternals/de	74520
Ghana	0-2424-26-004 Wait for the tone or instructions, and then dial: 888-799-0983	www.speakupfeedback.eu/web/nttexternals/gh	74520
Hong Kong Sar, Greater China	800963161	www.speakupfeedback.eu/web/nttexternals/hk	74520
Hungary	0680981359	www.speakupfeedback.eu/web/nttexternals/hu	74520
India	0008004401221	www.speakupfeedback.eu/web/nttexternals/in	74520
Indonesia	If you are calling with provider Indosat: 001 803 440 559 If you are calling with provider Telkom: 007 803 440 559	www.speakupfeedback.eu/web/nttexternals/id	74520
Ireland	1800-552136	www.speakupfeedback.eu/web/nttexternals/ie	74520
Italy	800-787639	www.speakupfeedback.eu/web/nttexternals/it	74520
Japan	0120 774878	www.speakupfeedback.eu/web/nttexternals/jp	74520
Kenya	0800733255	www.speakupfeedback.eu/web/nttexternals/ke	74520
Korea (South)	007984424261	www.speakupfeedback.eu/web/nttexternals/kr	74520
Laos	N/A	www.speakupfeedback.eu/web/nttexternals/la	74520
Luxembourg	800-21048	www.speakupfeedback.eu/web/nttexternals/lu	74520

Macao	N/A	www.speakupfeedback.eu/web/nttextexternals/mo	74520
Malaysia	1-800-88-4307	www.speakupfeedback.eu/web/nttextexternals/my	74520
Mexico	8001234618	www.speakupfeedback.eu/web/nttextexternals/mx	74520
Mozambique	N/A	www.speakupfeedback.eu/web/nttextexternals/mz	74520
Myanmar	MPT: 0800 800 8025	www.speakupfeedback.eu/web/nttextexternals/mm	74520
Namibia	N/A	www.speakupfeedback.eu/web/nttextexternals/na	74520
Netherlands	0800 0222931	www.speakupfeedback.eu/web/nttextexternals/nl	74520
New Zealand	0800450436	www.speakupfeedback.eu/web/nttextexternals/nz	74520
Nigeria	07080601488	www.speakupfeedback.eu/web/nttextexternals/ne	74520
Norway	800-18333	www.speakupfeedback.eu/web/nttextexternals/no	74520
Philippines	1800 1441 0215	www.speakupfeedback.eu/web/nttextexternals/ph	74520
Poland	008004411739	www.speakupfeedback.eu/web/nttextexternals/pl	74520
Portugal	800-831528	www.speakupfeedback.eu/web/nttextexternals/pt	74520
Russia	810 800 2626 9902	www.speakupfeedback.eu/web/nttextexternals/ru	74520
Saudi Arabia	8008442726	www.speakupfeedback.eu/web/nttextexternals/sa	74520
Singapore	1800-8232206	www.speakupfeedback.eu/web/nttextexternals/sg	74520
Slovakia	0800004529	www.speakupfeedback.eu/web/nttextexternals/sk	74520
South Africa	0800991526	www.speakupfeedback.eu/web/nttextexternals/za	74520
Spain	900-973174	www.speakupfeedback.eu/web/nttextexternals/es	74520
Sweden	020-798813	www.speakupfeedback.eu/web/nttextexternals/se	74520
Switzerland	0800-561422	www.speakupfeedback.eu/web/nttextexternals/ch	74520
Taiwan, Greater China	00801444317	www.speakupfeedback.eu/web/nttextexternals/tw	74520
Tanzania	0808 11 0106	www.speakupfeedback.eu/web/nttextexternals/tz	74520
Thailand	001800 441 4284	www.speakupfeedback.eu/web/nttextexternals/th	74520
Turkey	00800 448824369	www.speakupfeedback.eu/web/nttextexternals/tr	74520
Uganda	N/A	www.speakupfeedback.eu/web/nttextexternals/ug	74520
United Arab Emirates	80004412727	www.speakupfeedback.eu/web/nttextexternals/ae	74520
United Kingdom	0800-1693502	www.speakupfeedback.eu/web/nttextexternals/gb	74520
United States	1-866-2506706	www.speakupfeedback.eu/web/nttextexternals/us	74520
Vietnam	Viettel: 12280319 VPNT / Vinaphone: 120852140 Mobifone: 121020030	www.speakupfeedback.eu/web/nttextexternals/vn	74520
Zambia	N/A	www.speakupfeedback.eu/web/nttextexternals/zm	74520