



Policy Statement

Modern Slavery Statement

NTT Limited

1st April 2021 – 31st March 2022

1 Introduction

NTT Ltd. and each of its subsidiaries ('NTT', 'we', 'us', 'our') are here to enable the connected future. We come together to make the world a better place, and every day we use the power of technology to make it happen.

We want to create a more sustainable, better world that helps our communities thrive. We are purpose-led and performance-driven and pride ourselves on our reputation for conducting business in an ethical, open, and honest way, in line with our core values, and commitment to high standards. We do the right thing – even when no one is watching.

We must ensure that we act with integrity and conduct our business ethically with respect for all our people, the clients and communities within which we work.

We have adopted a Code of Conduct and Business Ethics ('our Code') that guides our actions in conducting business in a sustainable, socially responsible, and ethical way. Our Code is underpinned by our values and defines the rules and behaviors that we expect all our people and third parties to adhere to. Specifically, our Code reinforces our commitment to ensuring that we act to prevent any form of modern slavery or human trafficking and uphold fundamental human rights throughout our business and supply chain.

Our policies comply with all laws, regulations, and codes, that apply to our business. This statement sets our policies and actions that we take to ensure the prevention of slavery and human rights offences within our business operations and supply chain.

2 Our business

We are a global technology and services provider headquartered in London, United Kingdom, operating under the brand name NTT Ltd.

Globally, we employ approximately 50,000 employees across 57 countries and deliver services in over 200 countries. We are a wholly owned subsidiary of NTT Group.

3 Our supply chain and global partnerships

We take a multivendor approach across our business operations, collaborating with the industry's most trusted strategic alliance partners across networking, hybrid infrastructure, enterprise applications, security, collaboration, and customer experience. Working with these partners, we build services that help our clients implement, support, and manage these technologies.

Our Third-Party Risk Management Framework is designed to ensure that third parties within our supply chain are assessed to ensure adherence to our ethical and compliance standards.

4 Modern slavery and human rights policy statements

4.1 Modern Slavery

We are committed to preventing any form of modern slavery within our business and our supply chain and only contract with third parties who demonstrate a serious commitment to the health and safety of their people and operate in compliance with human rights laws, regulations and codes. We do not use or condone the use of slave labour or human trafficking, denounce any degrading treatment of individuals or unsafe working conditions, and support our products being free of conflict minerals.

All third parties that we engage must comply with modern slavery laws, regulations and codes and have adequate controls in place to ensure that they are not exposed to or complicit in human trafficking and modern slavery. We work closely with our third parties on an ongoing basis to ensure that they are acting responsibly.

4.2 Human Rights

We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. Our Code and values uphold these principles and reinforces our commitment to being a responsible business.

We respect all labour laws in every territory in which we operate and maintain stringent controls to ensure that our supply chain is free from any form of forced labour and that we are never involved, either directly or indirectly, in the infringement of human rights.

All suppliers and partners are required to agree to our position on human rights and commit to ensuring that they never make use of child or forced labour.

5 Modern slavery risk management processes and due diligence

5.1 Organizational and management structure

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

Conduct, Ethics and Integrity is a Principal Risk in our business and is managed in accordance with our NTT Risk Management Framework and Policy. A dedicated Business Conduct and Ethics Forum, which includes key ethics leaders from across our business operations, meets on a quarterly basis to ensure that appropriate governance mechanisms are implemented to effectively manage associated risks, including the prevention of modern slavery and human trafficking. Matters relating to modern slavery and human trafficking are reported to our NTT Ltd. Audit and Risk Committee on a quarterly basis.

All stakeholders are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business at the earliest possible stage. We have a dedicated SpeakUp platform and encourage our employees and external stakeholders to speak-up if they know of or suspect any unethical behaviour or misconduct in our business. We have an established process to respond to SpeakUp reports.

5.2 Training

We have implemented annual employee training and induction training for new employees to raise awareness and educate our employees on our Code and policies. This includes various concepts of modern slavery and human rights.

5.3 Corporate social responsibility activities

All our employees must ensure that when volunteering to charitable, civic, and public services organizations or participating in any political process that their activities are consistent with the terms of their employment, our values and policies, and does not create any actual or perceived acts of modern slavery or human rights violations.

5.4 Human Rights Impact Assessments

We conduct Human Rights Impact Assessments on a periodic basis to identify potential human rights risks and impacts in our business and supply chains and aim to take appropriate steps to ensure that there is no slave labour or human trafficking in our business and supply chain. Where deficiencies or concerns are identified, we take action to address these within our business and where necessary, act to strengthen collaboration with our third parties to eliminate identified issues in our supply chain.

This statement was approved by the following signatories:



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