

NTT DATA Europe & Latam Rights Policy



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1 Introduction

NTT DATA EMEAL Regional Unit (“NTT DATA EMEAL” or “the Regional Unit”) is a company committed to respecting the Human Rights of all the people with whom it interacts, collaborators, clients, suppliers, business partners and other stakeholders. In coordination with the General Management and the different areas of operation, the company seeks to promote policies and processes to prevent and reduce conflict and high-risk situations in all its labor and commercial relationships and its global value chain. We aim to realize a safe, secure, and prosperous, sustainable society by fulfilling this responsibility.

To this end, we respect and promote the Universal Declaration of Human Rights and other internationally recognized Human Rights protocols, conventions, etc., as well as the International Labor Organization “ILO” Conventions, the OECD guidelines for multinational companies, the United Nations Global Compact and UK Modern Slavery Act, among others in all our corporate activities and business operations. We will strive to ensure that we are not directly or indirectly involved in Human Rights violations.

In the unlikely event of any negative impact on Human Rights, we will take appropriate action, and we will permanently review and improve business operations and implement a due diligence process in order to establish and maintain a corporate structure that respects human rights.

2 Definitions

- **Human Rights:** Human Rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human Rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination (United Nations, 2023).

- **Universal Declaration of Human Rights:** Drafted by representatives with different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on 10th December, 1948 (General Assembly resolution 217 A) as a common standard of achievements for all people and all nations. It sets out, for the first time, fundamental Human Rights to be universally protected and it has been translated into over 500 languages (United Nations, 2023).
- **Slavery, servitude:** Is the status or condition of a person over whom any or all the powers attaching to the right of ownership are exercised. (Supplementary Convention on the Abolition of Slavery).
- **Forced or compulsory labor:** Any work or service exacted from an individual under the threat of any **penalty**, and for which said individual does not volunteer (Article 2.1 of ILO Convention 29).
- **Discrimination:** The term “discrimination” includes all types of direct discrimination, any distinction, exclusion, or preference based on race, color, sex, religion, political opinion, national ancestry or social origin that has the effect of nullifying or altering the equality of opportunities or treatment in employment and occupation (Article 1.1 of ILO Convention 111): (Article 1.1 of ILO Convention 169).
- **Due Diligence:** According to the Guiding Principles on Business and Human Rights (principles 17-21), the term "due diligence" in Human Rights matters refers to a continuous management system that the company adopts depending on the sector in which it operates. Develops its activity, the context of its operations, the company size and other factors, to ensure that Human Rights are respected and not contribute to the violation of said rights. This process involves "identifying, preventing, mitigating and being accountable" for potential negative impacts generated by the company.

3 Legal Framework

NTT DATA EMEAL aims to contribute to a sustainable environment. We believe that our business activities can have a positive impact on society. As a Company that operates globally, we use the 2030 Agenda and the UN Sustainable Development Goals as a guide to building a better society by employing and nurturing diverse talent and encouraging the responsible use of technology.

Our ESG strategy focuses on the key issues that impact our stakeholders: economic growth, high-quality education, diversity and inclusion, social issues, the respect of Human Rights and governance.

NTT DATA EMEAL will also seek ways to respect international Human Rights principles when there is a conflict between internationally recognized Human Rights and the laws and regulations of countries and territories.

NTT DATA EMEAL complies with the Universal Declaration of Human Rights and other international treaties and conventions which are discussed and adopted from a global perspective, as common standards that all people and countries should achieve.

As a member of NTT Group, NTT DATA EMEAL understands fully and strives to realize the NTT Group Global Human Rights Policy, which is part of NTT Group's core policies.

NTT DATA EMEAL endeavors not to cause or exacerbate any negative impact on Human Rights in the course of our business activities and will not tolerate any forced labor or child labor. Further, the Regional Unit endeavors to introduce and implement Human Rights due diligence procedures to identify and take measures on the risks concerning Human Rights, and to take serious action to resolve negative consequences to Human Rights.

The following international covenants and conventions are considered and adopted from a global perspective, in order to carry out the Human Rights management in the Company:

3.1 International Standards

- The United Nations International Bill of Human Rights, which integrates the three following:
 - Universal Declaration of Human Rights.
 - International Covenant on Economic, Social and Cultural Rights.
 - International Covenant on Civil and Political Rights.
- The 10 Principles of United Nations Global Compact.
- United Nations Guide Principles on Business and Human Rights.
- OECD Guidelines for Multinational Companies
- Declaration of Fundamental Principles and Rights at Work Eight core principles of the International Labour Organization: "Forced Labor"; "Freedom of Association and Protection of the Right to Organize"; "Right to Organize and Collective Bargaining"; "Equal Remuneration"; "Abolition of Forced Labour"; "Discrimination (Employment and Occupation)"; "Minimum Age Convention" and "Elimination of the Worst Forms of Child Labour".
- The International Labor Organization "ILO" Conventions.
- Tripartite of Principles concerning Multinational Enterprises and Social Policy.
- The 17 Sustainable Development Goals, focused on the 4th, 5th, 8th, 10th, 13th, 16th and 17th Goals.

3.2 Key European Regulation

- Convention for the Protection of Human Rights and Fundamental Freedoms.
- European Union Directive on Corporate Sustainability Due Diligence (CSDDD).
- European Union Directive on Corporate Sustainability Reporting (CSDR).
- Artificial Intelligence Act.

3.3 Local Regulation & Guidelines

- UK Modern Slavery Act 2015.
- Spanish National Business and Human Rights Plan.

3.4 Internal Company rules

3.4.1 HQ's

- NTT Group Human Rights Policy.
- NTT Group's Human Rights Charter.
- NTT DATA Group Guidelines for Sustainability in Supply Chain.

3.4.2 EMEAL

- NTT DATA EMEAL Code of Ethics and Professional Conduct.
- NTT DATA EMEAL Sustainability and ESG Policy.
- NTT DATA EMEAL Diversity and Inclusion Policy.
- NTT DATA EMEAL Data Protection Policy.
- NTT DATA EMEAL Regional Unit Whistleblowing System-Internal Procedure.
- NTT DATA EMEAL Supplier Risk Management Policy.

4 Purpose and Scope of Application

4.1 Purpose

In this policy we define the specific commitments that NTT DATA EMEAL assumes in our daily activities and operations related to the respect and promotion of Human Rights, which may have a direct or indirect impact on the stakeholders with whom we engage and work every day.

4.2 Scope of Application

This policy establishes and formalize our commitment to implement a due diligence process in order to identify, prevent, mitigate, and, if necessary, remedy any adverse impact on Human Rights related to its activities and global value chain and it is applicable to all our stake holders.

NTT DATA EMEAL is committed to respecting Human Rights throughout its business operations by proactively working with and engaging in constant dialogue with all of its partners and stakeholders, including customers, shareholders, investors, employees, local communities, business partners, other companies and industry organizations, national and local government agencies, and NGOs, NPOs,

and experts. We will comply with respect for Human Rights through our business activities while making the most of the voices of society. We will build relationships of trust and cooperation with our stakeholders to better understand and respond appropriately from the perspective of those affected by our business.

In operations where NTT DATA EMEAL do not have total or effective control, the policy will be shared, promoting its principles and guidelines, take all the possible actions in order that third parties assume the principles and do not infringe Human Rights.

Additionally, in selecting and contracting our suppliers and any business partners, we will constantly be evaluating compliance with this policy.

5 Commitments to Our Key Human Rights Areas

NTT DATA EMEAL will continue to respect Human Rights and, to make a positive contribution to them. Our company recognizes the following Human Rights areas to be the most salient for our operations and therefore the priority for the Business.

5.1 Prohibition of discrimination

We will respect the diverse values and cultures and not discriminate based on race, nationality, ethnicity, place of origin, class, religion, creed, language, culture, gender, sexual orientation, gender identity, age, disability, illness, appearance, or any other characteristic that differentiate human beings. We will also address issues unique to each country and region through our business activities.

We strictly refrain from using expressions that promote discrimination, violate Human Rights, harassment, and other misleading expressions in the display and advertising of the services we provide. If such expressions are used, we will respond appropriately.

5.2 Prohibition of forced labor and child labor or any other way of Modern Slavery

We prohibit all forms of forced and compulsory labor, human trafficking, and child labor, and work to correct or eradicate labor practices that violate Human Rights. Freedom of association and the right to organize.

We respect the right of individuals to join or form a labor union of their choice, engage in union activities, participate in peaceful assemblies, bargain collectively, or refrain from such activities.

5.3 Fair wages

We provide a level of wages and benefits appropriate to local jurisdiction and accept norms and provide the locally and just recognized level of income for employees.

5.4 Freedom of expression

We respect the right to express all speech and expression without censorship or regulation. In addition, we respond appropriately to indications of discrimination and Human Rights violations that violate public welfare.

As a technology company, we are aware of the negative impact of harmful websites and slanderous content on social media. In this context, when communicating and designing digital solutions for our clients we will refrain from discriminatory expressions, speech, and displays and respect the following Human Rights.

5.5 Right to use a Technology aligned to high ethical standards

We believe that the new technologies created through research and development must be able to maintain the symbiosis between humans and nature. To this end, we believe that it is necessary to pursue research and development, utilization, and social implementation of new technologies based on high ethical standards.

We will deepen our understanding of its characteristics, constantly explore them, and respond appropriately with high ethical standards such as respect for Human

Rights and consideration for the benefit of nature. We will also continue to monitor and respond to the various Human Rights issues brought about by the development of technology.

5.6 Right to a responsible use of data and data privacy

We will respect privacy and comply with privacy regulations in accordance with applicable laws, regulations, and guidelines of all the jurisdictions where we have presence.

Also, we will handle each individuals' personal information appropriately and protect the rights and interests of individuals thoroughly. We will respond appropriately to inappropriate handling and use of information that is not in accordance with customers' wishes, increase the transparency of the use of collected data and monitor risks even after the services are provided.

5.7 Right to work in a healthy and safe environment

We encourage and preserve a workplace where employees can work energetically in good health, both physically and mentally, to maximize their well-being and that of society. To achieve this, we believe it is important to create a safe and secure workplace and promote a variety of work styles to suit different lifestyles and life events. And we will work towards ensuring and improving accessibility for the elderly, children, people with disabilities, the poor and other socially vulnerable people, and digitally divided people.

Also, we will strive to enhance our benefit programs so that employees can lead healthy and fulfilling lives while balancing work, social activities, and family life with life events (childcare, childbirth, etc.).

5.8 Respect of human rights and labor rights

We will respect human and labor rights as recognized in national and international legislation and adhere to international standards in countries where Human Rights legislation may have not seen adequate development.

5.9 Promoting a culture of respect for Human Rights

We will promote awareness among all our professionals, particularly in those countries where the risk of infringement may be higher than in another region.

6 Risk Prevention

NTT DATA EMEAL, in the development of its activity, seeks not to cause negative impacts in the field of Human Rights, continuously promoting their respect, and prohibits forced labour and child labour. Taking as a reference the UN Guiding Principles on Business and Human Rights, the Regional Unit will perform the Human Rights Due Diligence process to identify, prevent, mitigate, and correct Human Rights issues on a global scale and throughout the entire value chain. Besides, the Regional Unit strives to raise awareness of Human Rights and improve its management throughout the organization.

As the environment surrounding Human Rights is constantly changing, the Regional Unit regularly conducts assessments related to the impact on Human Rights. In fact, the corporate risk management activity is carried out by the Chief Risk Officer, applying the corresponding methodology, who assesses, in coordination with other areas of the Company, these risks according to their impact and likelihood of occurrence, specifically including risks linked to the ESG area and, more specifically with regard to this policy, those that have an impact on Human Rights, in order to implement prevention and/or mitigation measures.

NTT DATA EMEAL will review this Human Rights Policy on a periodic basis, or when necessary. The Regional Unit establishes common global targets for priority issues to be addressed and promotes their penetration into business operations in line with NTT Group criteria. In this sense, NTT DATA EMEAL is committed to ensuring the feasibility and effectiveness of the measures and will monitor progress. It will provide training to employees on Human Rights issues to raise awareness and improve internal understanding. In addition to this, the Regional

Unit also discloses sustainability reports, including Human Rights matters, which are also covered by other company actions linked to ESG, Labour and Compliance departments, to enable continuous evaluation and improvement.

NTT DATA EMEAL, following the guidelines from NTT DATA Group Corporation, will manage risks in every process within the Regional Unit by holding dialogues with experts and other third parties and work with everyone in the value chain to make improvements toward a broad and fair solution. In cases of potential Human Rights violations, the possibility of terminating the contractual relationship will be evaluated.

As a result of due diligence, if forced labor, inhumane treatment, child labor, discrimination, or wages below the minimum wage are recognized, the Regional Unit will take immediately actions, including the termination of the contractual relationship, in cases of serious Human Rights violations. In addition to this policy, compliance with the NTT DATA Group Guidelines for Sustainability in Supply Chain must be considered.

7 Internal Governance

NTT DATA EMEAL is committed to achieving and continuing to reinforce the understanding of respect for Human Rights and to undertake business activities with a full awareness of Human Rights.

In each Entity of NTT DATA EMEAL, we will guarantee compliance with the highest standards of protection of Human Rights, in accordance with the United Nations Universal Declaration of Human Rights and with the United Nations Guiding Principles on Business and Human Rights and other principles and standards herein reflected.

Accordingly, NTT DATA EMEAL has established the Human Rights Committee, as a collective body, responsible for the supervision and protection of Human Rights in the organization. Members of this Committee, with global roles, are the Head of

EMEAL ESG, the Head of EMEAL Compliance, the Head of EMEAL Labour and the Head of EMEAL Legal & Risk Management.

The Committee will implement regular sessions to be held bi-annually during the corresponding FY and will take the relevant decisions to spread throughout the region.

The main functions of this Committee are:

- Define prevention and avoidance of Human Rights related risks, including the value chain.
- Ensure potential violations of Human Rights are duly communicated via the EMEAL global Whistleblowing System.
- Supervise and monitor Human Rights due diligence activity.
- Design awareness and training actions on Human Rights in the organization.
- Integration of Human Rights best practices into business strategy.

Through this framework, we are constantly working to enhance Human Rights awareness across the NTT DATA EMEAL Regional Unit and foster Human Rights management, including conducting Human Rights due diligence, training on Human Rights issues to the extent applicable, and establishing and operating contact points for Human Rights.

In particular, the EMEAL Code of Ethics and Professional Conduct, emphasises the relevance of Human Rights topic, by dedicating a specific section (3.2. Respecting Human Rights) as one of the Key Principles to be followed.

8 Whistleblowing System in case of potential Human Rights violations

In NTT DATA EMEAL we have always stressed the importance of our Compliance with laws, regulations, standards, and internal policies, as well as our commitment to integrity and ethical principles.

In order to protect NTT DATA EMEAL interests, including goodwill, company and brand reputation, the Regional Unit has adopted a global EMEAL Whistleblowing System, effective as of May 1, 2022, covering all companies and branches under the Region.

This Whistleblowing System serves as a vital mechanism within organizations to address potential discrimination, harassment, or unethical behaviour. It is managed by principles of confidentiality, trust, and protection in favour of whistleblower to report misconducts avoiding any type of retaliation.

This robust Whistleblowing System reinforces the commitment to upholding ethical standards and ensures that alleged Human Rights violations are addressed effectively, promoting a culture of integrity and fairness within the organization.

All the employees of NTT DATA EMEAL and other third parties in the value chain, such as clients and/or suppliers, who may have knowledge or have founded suspect of some potential breach about the commitments in this Policy or other mandatory Policies, as well as the Code of Ethics and Professional Conduct, shall be communicated through the Global Whistleblowing System available at all local corporate websites ([Home - BKMS System \(bkms-system.net\)](https://bkms-system.net)).

9 Prevention and Awareness

At NTT DATA EMEAL we will make this policy public so that its content is known to all our stakeholders.

Training actions will be carried out to ensure that NTT DATA EMEAL employees adequately understand the content of this policy.

All collaborators have an obligation to know, understand and comply with this policy.

In order to apply the commitments established in this document, NTT DATA EMEAL will carry out appropriate due diligence processes that guarantee their implementation and monitoring.

The monitoring and supervision of this policy will be the responsibility of ESG & Sustainability EMEAL, the results of which will be reported to the Board of Directors.

This Policy was approved by the Board of Directors initially on September 24th, 2024 and modified for last time on September 24th, 2024.

Annex I. Approval and Modifications

Version number	1
Approver	Antonio Gómez Jarillo
Responsible party	General Counsel Europe & Latam CRO and BofD Secretary
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