

Our Modern Slavery & Human Trafficking Statement

July 2023

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Introduction from the CEO, NTT DATA UK Limited

It continues to be a priority for NTT DATA UK Limited to ensure that we trade ethically, source responsibly, and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain, including embedding further checks when onboarding suppliers and subcontractors.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Statement for the financial year ending 31st March 2023.



Fernando Apezteguia, Chief Executive Officer, NTT DATA UK Limited

28 July 2023

About NTT Group and NTT DATA UK Limited

NTT DATA UK Limited is a trusted global innovator of IT and business services. It is part of the NTT Group, a leading, global technology services company headquartered in Tokyo. With over 1500 employees in UK and Ireland, NTT DATA UK Limited enables clients, as well as society, to move confidently into the digital future.

Our mission is to use information technology to create new paradigms and value that help contribute to the achievement of a more affluent and harmonious society. As we help clients to transform through consulting, industry solutions, business process services, IT modernization and managed services, we always seek to ensure our work contributes to building a better world through responsible technology.

Our Values and Commitments

At NTT DATA UK Limited, we are fully committed to the highest standards of ethical conduct and integrity in all our business activities, including preventing slavery and human trafficking throughout our organisation and in our supply chain. This is reflected in our Modern Slavery and Human Trafficking Statement and throughout all our internal policies and training resources.

Our NTT DATA EMEAL LTD. Global Code of Business Conduct sets out our principles and standards, guides our actions in conducting business, and encourages reporting of any suspected breaches. Our Code of Business Conduct highlights our support and respect for human rights, including our commitment to ensure that modern slavery and human trafficking are not taking place anywhere within our organization or supply chain. The standards set out in our Global Code of Business Conduct are reflected in the other internal policies and procedures.

NTT DATA UK Limited expects all our employees to work in accordance with the principles and values outlined in our Global Code of Business Conduct and other internal policies and training resources. The company also expects the same high standards from all our suppliers, sub-contractors, and other business partners.

Our policies on Modern Slavery and Human Trafficking

NTT DATA UK Limited expects all our employees to work in accordance with business values and principles outlined in our Code of Business Conduct and other internal policies and training resources. Our Code of Business Conduct and all other applicable policies are readily available to all NTT DATA UK Limited employees on our Intranet. We review and update our Modern Slavery and Human Trafficking Statement, Code of Business Conduct, Procurement, and other Policies on a regular basis.

NTT DATA UK Limited has the following policies for identifying and prevent modern slavery and human trafficking in our operations:

- **NTT DATA EMEAL LTD. Global Code of Business Conduct:** Our code encourages employees to conduct all business activities in accordance with the highest level of integrity and in compliance with all applicable laws and regulations. It prohibits child labour and requires employees to respect human rights and not to discriminate based on gender, nationality, belief, or religion.
- **NTT Group Human Rights Policy:** We are fully committed to respect the highest standards for protection of human rights, in accordance with UN Universal Declaration of Human Rights and with the UN Guiding Principles on Business and Human Rights. Our Global Human Rights Policy prohibits all forms of forced and compulsory labour, human trafficking, and child labour, and highlights our commitment to correct or eradicate labour practices that violate human rights.
- **Modern Slavery and Human Trafficking Policy:** This policy reflects our commitment to implementing and enforcing effective systems and adequate controls aimed at preventing any form of modern slavery within our business and our supply chain.
- **NTT DATA EMEAL Group Whistleblowing Policy:** Our aim is to encourage openness and we ask our employees to report any knowledge or suspicion of slavery or human trafficking using our NTT DATA EMEAL Group Whistleblowing System. NTT DATA UK Limited operates a strict non retaliation policy and will not, in any way, retaliate against a whistleblower acting in good faith.
- **NTT DATA UK Procurement Policy:** NTT DATA UK Limited is committed to purchase goods, works and services from suppliers who adhere to the standards of occupational Health & Safety, as well as environmental, ethical, and labour regulations. All suppliers, sub-contractors, and business partners are required to comply with NTT DATA UK Procurement Policy. Should a supplier fail to meet the standards expected by the NTT DATA UK Limited, the supplier shall be suspended or barred from doing business with NTT DATA UK Limited.

Our Supply Chain

Our supply chains provide us with goods, works, and services and include original equipment manufacturers, cloud software companies, distributors, professional services firms, and independent contractors through recruitment agencies.

NTT DATA UK Limited strives to ensure that our supply chains operate in an honest, fair, and transparent manner. Together with our suppliers, we are acting and striving to address various social issues related to human rights, labour environment, and corrupt practices that may occur within our supply chain.

All suppliers, sub-contractors, and business partners we engage must agree to our position on human rights and commit to not using any form of forced labour. They must comply with the NTT DATA UK Procurement Policy, all applicable modern slavery laws and regulations, and have adequate controls in place to ensure that they are not exposed to or complicit in human trafficking and modern slavery.

To date, we have not been made aware of, through NTT DATA EMEAL Group Whistleblowing System or otherwise, of any complaints or allegations of human trafficking or slavery activities against any of our suppliers. Should NTT DATA UK Limited become aware of an incident of modern slavery or human trafficking within its supply chain, NTT DATA UK Limited will work with the relevant supplier to implement swift remedial actions.

Risk assessment and Management

NTT DATA UK Limited recognizes the challenges around modern slavery in complex global supply chains, and we are fully committed to understanding and minimizing the risks of modern slavery associated with goods, works, and services we purchase.

NTT DATA UK Limited has a zero-tolerance approach to modern slavery and human trafficking, and all forms of corruption and bribery associated with these criminal acts. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and adequate controls aimed at preventing any form of modern slavery within our business and our supply chain.

As a professional services firm, our ongoing assessment indicates that the risk of modern slavery or human trafficking occurring within our business is low, when compared to other industries. We are committed to continuously improving our risk assessment process to ensure we are in a position to timely identify and remediate any modern slavery concerns that could be connected to both our business and supply chain.

Our objective is to operate an effective supply chain governance framework which minimizes the risk of slavery and human trafficking within our supply chains. NTT DATA UK Limited will ensure that we do not knowingly participate in any activity that involves any form of modern slavery or enter into business with any organisation which knowingly supports or is found to be involved in slavery, forced or compulsory labour, or human trafficking.

As part of our approach to maintaining a supply chain that is free of modern slavery, NTT DATA UK Limited carries out due diligence throughout the supplier selection process to avoid complicity in human rights abuses, slavery, forced or compulsory labour, or human trafficking.

NTT DATA UK Limited also incorporated the terms requiring compliance with all applicable laws, rules and regulations including those related to modern slavery and human trafficking in our standard contracts. We would regard any confirmed instance of modern slavery or human trafficking as a breach of contract and reserve the right to take appropriate action, including the ability to terminate such contracts immediately.

NTT DATA UK Limited Procurement Department is responsible for ensuring all suppliers of NTT DATA UK Limited have been vetted as part of the onboarding process and all supply chain supplier issues are escalated and resolved in an effective, timely, and appropriate manner.

Training and Awareness

All NTT DATA UK Limited employees are required to read and comply with our NTT DATA EMEAL LTD. Global Code of Business Conduct, which provides a clear set of principles for the way we conduct business as well as guidance on how to put these principles into action in their day-to-day work. Our Code of Business Conduct makes it clear that all our employees have a responsibility to use our NTT DATA EMEAL Group Whistleblowing System to report any genuine suspicion of criminal conduct, or a breach of legal or regulatory statutes, including instances of modern slavery or human trafficking without fear of retaliation.

We have implemented mandatory employee training and induction training for new employees to raise awareness and educate our employees on our Global Code of Business Conduct and other Policies.

NTT DATA UK Limited Is committed to ensuring that the teams within the business that are considered most likely to observe potential modern slavery risks are fully aware of human rights and modern slavery risks, modern slavery indicators, and are equipped to identify instances of possible slavery and human trafficking within our business and supply chains.

Governance

Responsibility for compliance with the Modern Slavery Act 2015 rests with the NTT DATA UK Limited leadership team, with the responsibility for the Modern Slavery & Human Trafficking Statement assigned to the Head of Legal and Compliance. The NTT DATA UK&I Compliance Team works with the following key risk areas departments to monitor modern slavery and human trafficking risk: Legal, People & Culture, Supply Chain, People & Culture, and Sales.

Reporting Concerns

We encourage our employees, suppliers, sub-contractors, and business partners to speak up about any concerns regarding human rights, modern slavery or human trafficking in our operations or supply chain.

NTT DATA Group has established an external [NTT DATA EMEAL Group Whistleblowing Reporting System](#) so that anyone who discovers any alleged or potential wrongdoing can report the details of it without being subjected to any disadvantageous treatment.

NTT DATA UK Limited is committed to investigating all the reported matters in an appropriately robust and timely manner.