

NTT DATA Group Code of Conduct



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Message from Global CEO

Since our establishment, NTT DATA has been growing our business by dedicating ourselves to providing services to our clients and society under our mission statement of using information technology to create new paradigms and value that help contribute to a more affluent and harmonious society.

We are now operating in many countries and regions in the world and under business environments with diverse cultures and business customs. In order to fulfil our corporate social responsibility as an ethical company while providing outstanding services to clients all over the world in a fast-changing and complex environment, we have put together the “NTT DATA Group Code of Conduct” to guide our business activities regardless of country and region. In this new Code of Conduct, we outline important guidance on how NTT DATA Group approaches current social issues including sustainability and human rights, as well as how we behave in our business activities with respect to ethics and compliance.

It is our unwavering commitment to conduct business activities ethically and responsibly. What each and every one of us do every day build the foundation for trust in NTT DATA Group. As a member of NTT DATA Group, please read and understand the Code of Conduct, and most importantly, apply the Code in your day-to-day business activities.

As a Trusted Global Innovator, let us continue working with each other to realize a sustainable society with our clients by maintaining high ethical standards, creating value towards the future and connecting people.

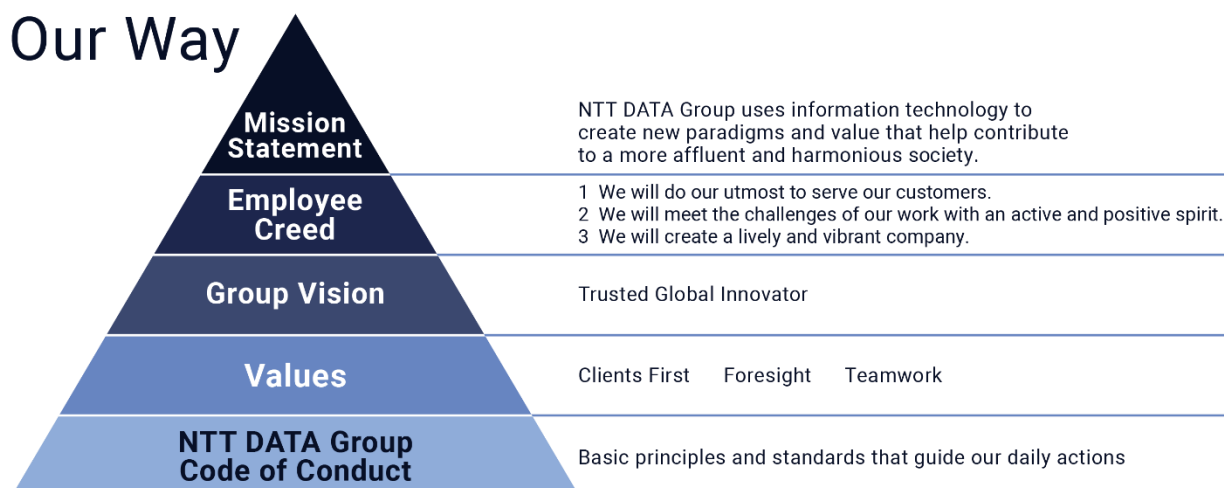
Yo Honma

Representative Director
President and CEO



About the Code of Conduct

NTT DATA Group is a corporate group that uses information technology to create new paradigms and value that help contribute to the achievement of a more affluent and harmonious society. In order to continue to develop further, NTT DATA Group has outlined the basic ideas of our direction in “Our Way”.



The Code of Conduct is a part of Our Way and describes our basic principles and standards, such as what NTT DATA Group values in conducting its business, and the manner in which Employees of NTT DATA Group should conduct our business activities.

The Code of Conduct has been adopted by the board of directors of NTT DATA and constitutes an official code that is adopted by the board of directors, or an equivalent decision-making body of each Company in NTT DATA Group.

It is the responsibility that each of us understands, observes, and implements the Code. The executives of each NTT DATA Group Company will take the lead in complying with this Code of Conduct, and establish an environment that encourages each Employee’s compliance with the Code of Conduct.

In addition, we expect all business partners (including persons and entities who are in business relationships that support the Group such as service providers, consultants, distributors, contractors, vendors, suppliers and other third parties) who engage in business with NTT DATA Group to comply with the Code.

Each NTT DATA Group Company may, when required due to local laws, nature of business, and on-the-ground business practices, create and adopt local-based codes of conduct that do not contravene this Code of Conduct, subject to the approval process of NTT DATA Group.

Employees who violate the Code of Conduct or other laws and regulations may be subject to disciplinary action in accordance with the Company’s Policies and Procedures up to and including

termination of employment, and/or legal liability subject to applicable employment laws, other laws and regulations.

However, if any part of the Code of Conduct or the Company Policies and Procedures for implementing the Code of Conduct conflicts with applicable laws and regulations in the relevant country or region, an exemption may apply to non-compliance with the Code of Conduct to the extent of such conflict.

In the Code of Conduct, the terms below are defined as follows:

- “NTT DATA” refers to NTT DATA Corporation.
- “NTT DATA Group” or the “Company” refers to NTT DATA and its consolidated subsidiaries.
- “Employees” or “we” refers to directors, officers and employees of the NTT DATA Group, including persons who have an employment relationship with the Company and who are subject to rules of employment.
- “Policies and Procedures” refers to the Code of Conduct and each Company’s policies and procedures, relevant rules and guidelines.

Our Way

NTT DATA Group Mission

Mission Statement	NTT DATA Group uses information technology to create new paradigms and value that help contribute to a more affluent and harmonious society.
Employee Creed	1 We will do our utmost to serve our customers. 2 We will meet the challenges of our work with an active and positive spirit. 3 We will create a lively and vibrant company.

Achieving our mission in response to the business environment

Our Group Vision indicates where NTT DATA Group aims to be in 10 years ahead and our Values express what is most important for the realization of the Group Vision.

Group Vision	Trusted Global Innovator We realize the dreams of our clients around the world through long-term relationships. We develop evolving ecosystems with our clients through leading-edge technologies. We enhance our creativity by respecting diversity.
Values	Clients First First, and above all else, we place the needs of our clients. We continuously work to understand our clients' business and strive to resolve every concern to their satisfaction. We feel a responsibility to ensure their success. We let this obligation set the direction of our work and guide our actions. Foresight We never settle for the status quo. Instead, with speed and foresight, we anticipate challenges that lie ahead. We consider the future of IT as well as the future of our clients' business, work to enhance our ability to picture the future, and with our ecosystem, adapt to the changing business environment. In this way, we help our clients meet their goals and create a brighter future for society. Teamwork We put great importance on enabling our employees to achieve their best through their work with each other. We believe that when a diverse group of individuals bring their unique world views together, share their wisdom, and works toward a common goal, the results are extraordinary and far beyond what can be achieved by any one person.

* For details : Our Way

<https://www.nttdata.com/global/en/about-us/our-way/>

01

Core Principles of Code of Conduct

- 1.1 Ethical and Responsible Business Activities
- 1.2 Respect for Human Rights
- 1.3 Diversity, Equity and Inclusion
- 1.4 Global Environmental Issues
- 1.5 Responsible Value Chain

1.1 Ethical and Responsible Business Activities

NTT DATA Group complies with applicable laws and regulations in the countries and regions where it does business, and have zero tolerance for any form of corporate criminal offences and illegal misconducts. Furthermore, NTT DATA Group respects international standards and acts in a highly ethical manner, in accordance with the social responsibility expected of a global company. These are our fundamental principles of behaviors necessary for NTT DATA Group to gain trust from society, enhance our corporate values, and safeguard our own sustainable development.

We engage in our day-to-day business activities always in accordance with our fundamental principles.

1.2 Respect for Human Rights

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

NTT DATA Group 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, NTT DATA Group 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.

* For details: NTT Group Global Human Rights Policy
<https://group.ntt/en/newsrelease/2021/11/10/pdf/211110ca.pdf>

1.3 Diversity, Equity and Inclusion

NTT DATA Group believes DEI (Diversity, Equity and Inclusion) is essential, because promoting and realizing DEI will bring about innovation in the world and lead to the sustainable growth and development of society.

DEI is an environment in which people with diverse personalities, backgrounds, perspectives and values respect each other (Diversity), work under fair opportunities and conditions according to their circumstances (Equity), and each person makes the most of themselves to work in cooperation with each other (Inclusion).

We respect all people (such as clients, business partners and Employees) with diverse personalities, backgrounds, perspectives, and values. NTT DATA Group will endeavor to foster a society where Employees can utilize their respective talents, share their wisdom, and thrive through cooperating with all people.

1.4 Global Environmental Issues

NTT DATA Group endeavors to do its part with respect to global environmental issues for the benefit of all people and future generations through the Group's businesses and corporate initiatives.

We aim not only to become carbon neutral throughout the NTT DATA Group value chain, but also to achieve carbon neutral status for our clients and society at large by means of green innovation that utilizes IT. We will create a sustainable environment by working together with various stakeholders for achieving goals including circular economy and nature conservation.

1.5 Responsible Value Chain

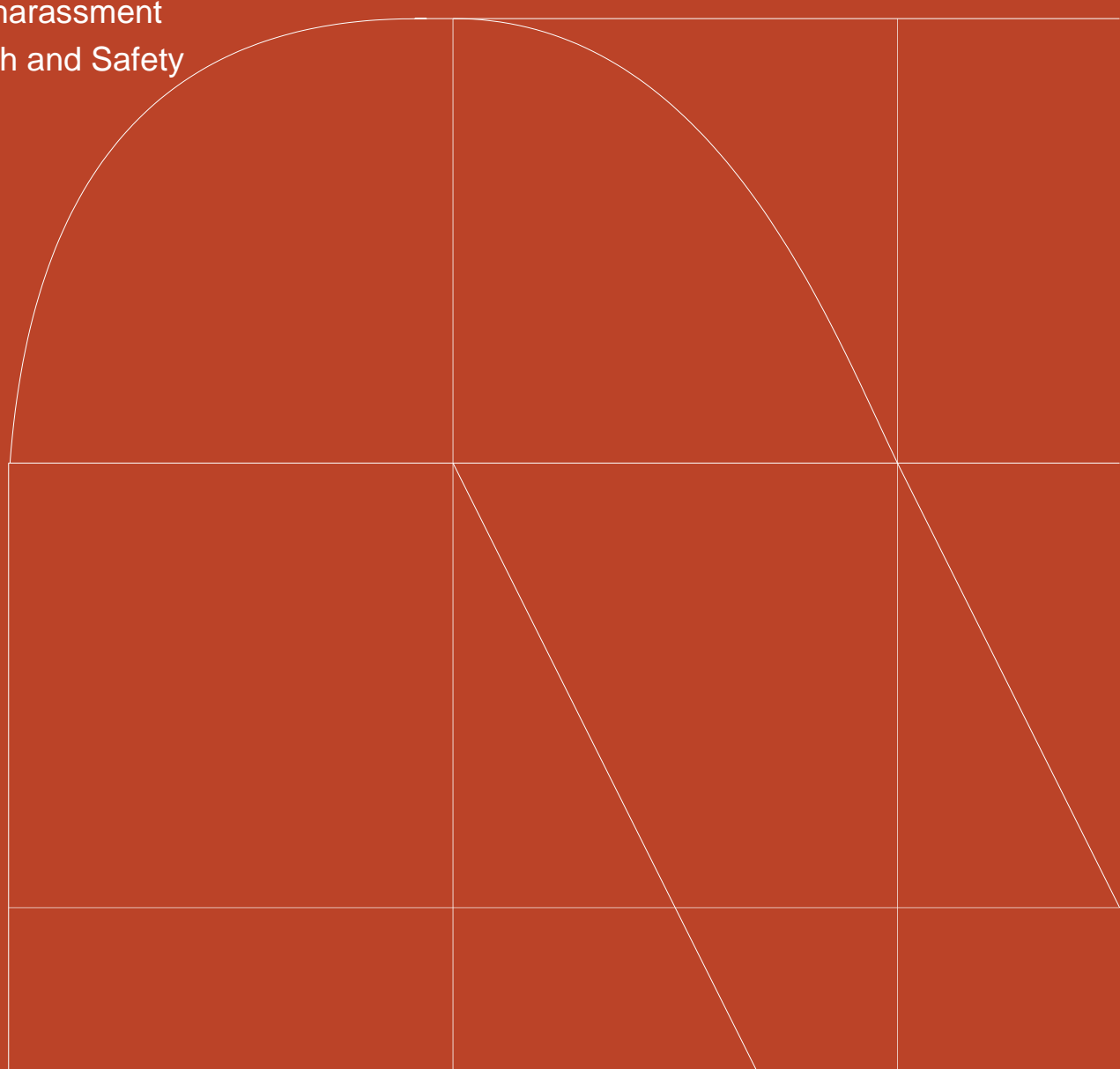
NTT DATA Group acts and strives, together with our clients and business partners, to address various social issues related to human rights, labor, environment and corrupt practices that may occur not only within the Group but also on our value chain.

We endeavor to contribute to realizing a sustainable society by sufficiently communicating with our clients and business partners and building a responsible value chain by evaluating the impact on society of the products and services we procure and the solutions we provide.

02

Work Environment

- 2.1 Equal Opportunity
- 2.2 Anti-harassment
- 2.3 Health and Safety



2.1 Equal Opportunity

NTT DATA Group believes that human resources are the most valuable assets for its business in a business environment where the globalization of business activities is accelerating and the demand for new IT services is growing, as they allow us to create value that is unique to the Group in the face of changing times and business operations.

NTT DATA Group believes that it is important to secure a more diverse range of perspectives and abilities within the Group and provide equal opportunities and fair treatment in recruitment, employment, training, compensation, benefits, staff placement, and promotion, in accordance with each individual's abilities and regardless of race, nationality, marital status, ethnicity, place of birth, citizenship status, age, ancestry, social status, language, religion, creed, gender, sexual orientation, gender identity or expression, disability, veteran status, family structure, or lifestyle.

We are committed to actively working towards creating a vibrant and open work environment where human resources with diverse values can maximize their abilities and play an active role.

2.2 Anti-harassment

NTT DATA Group believes that harassment is a serious problem that unreasonably undermines individual dignity, impairs the working environment and inhibits personal performance.

NTT DATA Group is committed to treating everyone with dignity and respect and does not tolerate any kind of harassment, irrespective of job title or position and whether the person is an NTT DATA Group Employee, client or business partner.

We strive to maintain a safe and productive professional working environment that is free from harassment, and will not harass or engage in harassment against anyone, including other Employees in the Group as well as employees of our clients and business partners.

2.3 Health and Safety

NTT DATA Group incorporates "health management" as part of its management strategy, and aims to create an environment in which Employees are healthy, and each Employee can continue to work safely while increasing their motivation and energy.

The safety of Employees is a top priority and NTT DATA Group is committed to providing a safe workplace to Employees.

We will implement safety measures in the working environment in accordance with applicable laws and regulations as well as Company Policies and Procedures. We will not work under the influence of alcohol, illegal drugs or controlled substances; and we will not engage in any act that is a threat to the health, safety and work environment, such as gambling, possessing or using firearms or other dangerous objects, transporting or using illegal drugs, and acts of violence or intimidation.

03

Corporate and Third Party Assets

- 3.1 Corporate Assets
- 3.2 Cybersecurity
- 3.3 Confidential Information
- 3.4 Data Privacy
- 3.5 Intellectual Property

3.1 Corporate Assets

The assets of NTT DATA Group are important property that should only be used for the legitimate business purposes of the Company. Assets include both the tangible and the intangible, such as information assets (all information and information systems used in the execution of business, including confidential information, intellectual property, know-how, and software), equipment and brands.

We will use and maintain the assets of NTT DATA Group appropriately in accordance with applicable laws and regulations, and the Policies and Procedures prescribed by the Company.

3.2 Cybersecurity

NTT DATA Group believes any cyberattacks could impair or leak important information assets belonging to our clients or the Company, which may result in loss of credibility of NTT DATA Group, as well as social disruption due to the suspension of social infrastructure systems. This is due to the fact that there has been a rapid increase in recent years in the number of sophisticated targeted cyberattacks aimed at enterprises and government agencies, cyberattacks targeted at vulnerabilities of information assets, and cyberattacks that use ransomware aimed at monetary extortion.

The appropriate use of information assets and ensuring cybersecurity are the key to maintaining NTT DATA Group's trust with all its stakeholders and supporting vital infrastructure for the society. In terms of cybersecurity measures, NTT DATA Group has established the NTT DATA Group Security Policy and has put in place various technical, physical and human measures (including establishing policies and procedures, and implementing training and awareness activities on cybersecurity) to identify, safeguard, detect, respond to, and recover from any attack.

We endeavor to use information assets appropriately and implement cybersecurity in accordance with the NTT DATA Group Security Policy in order to protect important information assets belonging to our clients and the Company from cyberattacks.

3.3 Confidential Information

NTT DATA Group believes that confidential information is one of our most valuable information assets and a source of NTT DATA Group's competitiveness.

NTT DATA Group has established the NTT DATA Group Security Policy to protect confidential information belonging to our clients, our business partners and NTT DATA Group.

We are responsible for protecting confidential information belonging to our clients, our business partners and NTT DATA Group, as well as ensuring that confidential information is only used for the purposes and scope deemed necessary for the Group's business operations; and we never disclose or divulge information to any third party without proper consent by the appropriate disclosing party.

Confidential information refers to all information (including information related to third parties) not in the public domain that is generated or acquired by Employees of NTT DATA Group in the course of their business operations and that must be treated as confidential. Confidential information includes undisclosed corporate information, design documents, source code, personal data, trade secrets and sensitive information.

3.4 Data Privacy

NTT DATA Group believes that the social demand for protection of personal data and privacy is rising under the situation where an increasing number of countries and regions have been strengthening their laws and regulations to protect personal data and privacy, including, without limitation, the European Union's General Data Protection Regulation.

NTT DATA Group, as a corporate group handling personal data, ensures that all personal data and privacy are handled appropriately for each business, in accordance with applicable laws and regulations regarding the protection of personal data and privacy in each country or region, as well as the Company's Policies and Procedures including the NTT DATA Group Security Policy.

We collect, use, provide, and dispose of personal data in accordance with such laws and regulations in each country or region, as well as the Company's applicable Policies and Procedures.

3.5 Intellectual Property

NTT DATA Group believes that intellectual property is one of our most valuable information assets and a source of NTT DATA Group's competitiveness.

We actively protect intellectual property belonging to NTT DATA Group, including copyrights, patents, industrial designs, trademarks, and trade secrets, and work to maximize the value of these assets. We also respect valid intellectual property rights belonging to third parties and take necessary measures, such as conducting reasonable investigations, to avoid infringing any such rights (for example, having unauthorized access to, downloading, and copying third-party software without an official license).

All creations and inventions made by NTT DATA Group's Employees in the course of their employment belong to NTT DATA Group, to the extent prescribed under applicable laws and regulations and the Company's Policies and Procedures. We preserve and protect the rights of NTT DATA Group regarding any such creations and inventions.

04

Business Operation

- 4.1 Relationships with Clients and Business Partners
- 4.2 Anti-Money Laundering and Exclusion of Anti-Social Forces
- 4.3 Entertainment and Gifts
- 4.4 Anti-Bribery and Anti-Corruption
- 4.5 Political Contributions and Charitable Donations
- 4.6 Fair Competition
- 4.7 Insider Trading
- 4.8 Technology Ethics
- 4.9 Trade Control and Economic Sanctions
- 4.10 Disclosure and Reporting
- 4.11 Tax
- 4.12 Corporate Citizenship

4.1 Relationships with Clients and Business Partners

In order to earn the trust of clients and business partners, NTT DATA Group carries out business activities in a highly ethical manner in accordance with the Code of Conduct, and implements the Code of Conduct even in a challenging, competitive environment.

We are committed to engaging in fair business practices, entering into appropriate agreements with our clients and in providing services to clients in accordance with such agreements, applicable laws and regulations as well as Company's Policies and Procedures. We endeavor to communicate sincerely with our clients, to meet their expectations and to understand and solve their problems.

When we procure products and services from business partners, we endeavor to provide our business partners with opportunities to compete fairly, and comprehensively assess their quality, price, delivery dates, and stability of supply, and procure competitive products and services that meet our business needs based on economic rationale.

* For details: NTT DATA Procurement Policy

<https://www.nttdata.com/global/en/about-us/procurement-policy>

4.2 Anti-Money Laundering and Exclusion of Anti-Social Forces

Maintaining relationships with criminals, terrorists and other anti-social forces who threaten the social order and security through criminal acts such as violence, force, fraud, trafficking of illegal drugs, and terrorism, can undermine the trust in NTT DATA Group and puts the Group and ourselves at risk. Anti-social forces may also attempt to use sophisticated business transactions involving NTT DATA Group to launder illegally obtained funds.

NTT DATA Group takes a firm stance against anti-social forces, refuses to accede to unreasonable demands, will never maintain a relationship with any such forces, and will not facilitate or engage in money laundering.

When conducting business with clients or business partners, we will comply with laws and regulations prohibiting money laundering and the provision of funds for terrorist activities, and will take necessary measures such as requiring the elimination of dealings with anti-social forces in accordance with Company Policies and Procedures.

4.3 Entertainment and Gifts

Providing or receiving entertainment or gifts by NTT DATA Group beyond the scope of social norms, even if permitted under relevant applicable laws and regulations, may exert an improper influence over the decision-making by the recipient.

When providing entertainment or gifts, we will do so appropriately for legitimate business purposes only, in accordance with Company Policies and Procedures. We will not directly or indirectly offer, promise or provide any illegal, improper or inappropriate entertainment or gifts to anyone including public officials and private individuals, whether or not it is intended to benefit the Company. We will not, under any circumstances, provide any entertainment or gifts that is illegal, improper or inappropriate to influence the behavior of others.

We also will not demand, approve or receive entertainment or gifts beyond the scope of relevant applicable laws and regulations or social norms.

Entertainment or gifts refers to providing a tangible or intangible benefit of value to a third party (including to their relatives and associates). Specifically, this includes the following examples, but is not limited to them:

- Giving money, goods or real estate
- Loaning money
- Loaning goods or real estate at no interest or low cost
- Providing services at no charge or low cost
- Transferring unlisted shares
- Hospitality (including travel, golf, meal and other recreational activities)
- Rebates such as gratuities, kickbacks, and promotional expenses
- Providing employment opportunities or other benefits

4.4 Anti-Bribery and Anti-Corruption

NTT DATA Group's businesses may have contact with public officials worldwide and bribery and corruption of public officials are strictly prohibited under the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the Japanese Unfair Competition Prevention Act, and other national and regional anti-bribery statutes.

NTT DATA Group complies with applicable national and local anti-bribery laws and regulations in its business conduct, and does not tolerate bribery or corruption of public officials in any way. We do not offer, promise or provide any illegal, improper or inappropriate entertainment or gifts to public officials, and do not engage in bribery.

In cases where bribery and corrupt practices involving public officials are conducted indirectly through a business partner, NTT DATA Group may be held liable whether it knows what is occurring or not. In order to prevent the risk of bribery, we will always pay adequate attention to the risk of bribery and other corrupt practices when dealing with business partners. We will take appropriate measures such as examining the risk of bribery in advance and entering into contracts that include anti-bribery and anti-corruption provisions.

We do not make facilitation payments (generally, small payments to public officials to facilitate the performance of regular public services), regardless of the customs of the country or the region.

Public officials refer to a wide range of personnel, including executives, staff members and representatives of state-owned enterprises, government agencies, ministries and other public organizations.

4.5 Political Contributions and Charitable Donations

Support for political organizations and candidates for public offices and support for charitable organizations by NTT DATA Group must be for appropriate purposes and be carried out with adequate transparency and in any case in compliance with applicable laws and regulations.

NTT DATA Group does not, in principle, engage in political contributions related to the Company's business or other political activities, unless permitted under applicable laws and regulations and Company Policies and Procedures.

We will, in the event of providing donations or support to charitable organizations related to the Company's business, conduct such activities in accordance with the steps specified in the Company's Policies and Procedures and after conducting necessary due diligence and confirming of its reasonableness. However, this does not prevent Employees from providing political contributions or charitable donations privately.

4.6 Fair Competition

In many countries and regions where NTT DATA Group operates, there are competition laws (laws and regulations such as antitrust law or competition law) aimed at protecting fair and free competition, and any conduct that impedes competition is very strictly regulated. Violating competition laws may result in large penalties imposed on the Company and Employees by competition authorities, or may even result in criminal penalties (including fine or imprisonment). In addition, there is a risk that clients and consumers may claim compensation for civil damages from the Company.

NTT DATA Group will conduct business in a fair and free competitive environment in compliance with competition laws.

Therefore, we will not engage in conduct that impedes fair competition, whether with competitors, business partners or any other third party. Such conduct includes:

- Agreements with competitors that violate competition laws, such as agreeing to increase or maintain the price of a product or service; allocating markets or clients; bid-rigging; and joint refusals to deal.
- Conduct with business partners that violates competition laws, such as making a business partner sell its products or services at a fixed price, or imposing a financial disadvantage on a business partner that does not sell at the fixed price.
- Unfairly disadvantaging a business partner by using our dominant position
- Providing a product or service at an unreasonably low price in order to eliminate competitors.

In addition to the above, we must be extremely cautious when contacting and communicating with our competitors. We will not propose or agree to the aforementioned agreements in any form, nor will we exchange competitively sensitive information with our competitors, such as information relating to price and cost or information relating to business partners and clients, in order to avoid suspicion of such arrangements.

4.7 Insider Trading

In the course of business execution, Employees may come across undisclosed information about the Company or other listed companies. Knowing the material facts of a listed company that have not yet been publicly disclosed and using that information to trade in shares or securities, is prohibited in many countries because it impairs the fairness and soundness of the stock market.

We consider the unpublished material information of these listed companies, particularly those material facts that may affect the investment decisions of investors, to be insider information, and if we become aware of such insider information pertaining to NTT DATA Group or other companies, we will not trade in the shares or securities of the company until such information is made public. We also do not communicate insider information to others, including family members, business or social acquaintances and we do not recommend transactions to others based on insider information, unless where an Employee needs to transfer the information for a legitimate business purpose and with required confidentiality measures.

Insider information includes, for example, information that is not publicly disclosed, such as:

- Progress toward revenue and revenue goals
- Forecasts and fluctuations of future earnings or losses of a company
- Information regarding mergers, acquisitions or tender offers under consideration
- New products or services, important agreements, etc.
- An event that has a material impact on a company's financial situation

4.8 Technology Ethics

NTT DATA Group engages in a variety of research and development activities. The new technologies that are created through such research and development activities must be able to maintain the symbiosis between humans and nature. To this end, NTT DATA Group believes that it is necessary to deepen our understanding of the characteristics of new technologies, constantly explore them, and pursue research and development activities, utilization, and implementation of new technologies to society with high ethical standards such as respect for human rights and consideration for nature.

In particular, Artificial Intelligence (AI) will become more prevalent in society and will affect people's behavior and decision-making. For the purpose of reducing the number of negative incidents potentially arising from AI, and realizing a human-centered society in which humans and AI truly coexist, NTT DATA Group, as a position to promote research, development, operation, and utilization of AI, will promote the development activities and application of AI technology to business in accordance with applicable laws and regulations, as well as NTT DATA Group's AI Guidelines.

In accordance with NTT DATA Group's AI Guidelines, we will promote innovation through dialogue and collaborations with diverse stakeholders by realizing fair and trustworthy AI, while preventing potential discrimination and use of biased data and giving due consideration to privacy and security.

* For details: NTT DATA Group's AI Guidelines

<https://www.nttdata.com/global/en/About%20Us/AI%20Guidelines>

4.9 Trade Control and Economic Sanctions

In many countries and regions where NTT DATA Group operates, applicable export and import laws and regulations and economic sanctions restrict transfer to designated countries of certain goods, services and technologies, including software and data, in order to maintain international peace and security and protect human rights. Such laws and regulations may also restrict transactions with specific individuals and organizations that threaten international peace, security and human rights, including transferring goods and services and receiving payments.

NTT DATA Group complies with such laws and regulations, economic sanction regimes and trade control requirements established at international and national levels, including implementing appropriate due diligence procedures to ensure compliance.

4.10 Disclosure and Reporting

NTT DATA is a public company listed on the Tokyo Stock Exchange and promotes the understanding and appropriate assessment of NTT DATA Group by all stakeholders, including shareholders and investors, by providing timely and appropriate disclosure of material corporate information such as financial information, management policy, and business activities related to NTT DATA Group in compliance with applicable laws and regulations.

NTT DATA Group prepares financial statements based on applicable accounting standards and accounting policies.

4.11 Tax

NTT DATA Group complies with applicable tax laws and regulations in the countries and regions in which it conducts business activities, and pays taxes accordingly. NTT DATA Group is committed to maintaining and enhancing its tax compliance processes and controls to mitigate tax risks. NTT DATA Group provides appropriate information to tax authorities in a timely matter and makes inquiries regarding financial processing, and if tax authorities discover an issue, NTT DATA Group immediately investigates and identifies its cause and adopts appropriate corrective and reform measures to prevent recurrence.

We understand and comply with applicable laws and regulations related to taxation.

4.12 Corporate Citizenship

NTT DATA Group strives to understand global and local social issues through dialogue, collaboration and cooperation with all stakeholders, and fulfills its responsibility as a good corporate citizen towards the development of global and local communities and through social contribution activities that utilize IT.

Our social contribution activities do not end at the workplace. NTT DATA Group encourages Employees to be actively involved in local communities through volunteer and pro-bono activities.

05

Responsible Conduct

- 5.1 Decision Making and Authorization
- 5.2 Accuracy of Records and Reports
- 5.3 Investigations and Audits
- 5.4 Conflict of Interest
- 5.5 Public Release
- 5.6 Reporting Concerns

5.1 Decision Making and Authorization

NTT DATA Group has established a delegation and approval process under Company Policies and Procedures in order to make timely and appropriate decisions and conduct business activities. NTT DATA Group Employees are required to make decisions and conduct transactions in accordance with procedures and processes as set out in these applicable Policies and Procedures.

When making a Company decision, we will make the best and most appropriate decisions for the Company based on necessary information, in accordance with Company Policies and Procedures.

We do not enter into any kind of contract, including verbal commitments binding the Company, sign any document, or engage in any other transaction, beyond the scope of the Company's decision-making and delegated authority.

5.2 Accuracy of Records and Reports

NTT DATA Group is obligated to disclose and report information in accordance with applicable laws and regulations in the countries and regions in which it engages in business activities. Accurate records are essential for the disclosure of such information, fulfillment of reporting obligations, maintaining trust in NTT DATA Group, and securing the Company's appropriate decision-making.

We maintain internal controls, accurately record information related to Company transactions and operations in reports and other documents, and store them with appropriate supporting information, in accordance with Company Policies and Procedures.

We do not create misleading or false records and do not maintain off-the-book accounts for any purpose. We reflect the true nature of transactions in our books and records.

5.3 Investigations and Audits

NTT DATA Group conducts investigations and audits of its business activities when necessary for business operations, including responding to investigations by government agencies and litigation, and conducting internal investigations. To the extent necessary for such investigations and audits, NTT DATA Group may request the cooperation of Employees.

We will cooperate in good faith with any investigation or audit as requested by the Company, including preservation and submission of necessary information. Retaliation against anyone who makes a good faith complaint of improper conduct, or who cooperates with an investigation into such conduct, will not be tolerated.

5.4 Conflict of Interest

In our daily activities, we may face situations where our personal relationships and financial interests conflict with the interests of the Company. Even in these situations, we will act in the best interest of the Company in conducting our business and will not engage in activities that conflict with the interests of the Company. Furthermore, even if there is no intention to pursue one's own interests at the expense of the Company's interests, a suspected conflict of interest alone may undermine trust in the fairness of NTT DATA Group's business and adversely affect it.

We will comply with the following principles:

- If the business activity in which we are involved at the Company poses a conflict of interest with our personal interests (including affording benefits to us or our close family member and giving profit opportunities to us or our close family member) or third party interests with whom we have a personal relationship (clients, business partners, or competitors), we will not engage in such business activities.
- We will not use the Company's assets, and information (including personal information) or business opportunities learned during the course of business for personal gain.

In the event of a transaction or relationship in which a conflict of interest is reasonably expected, we will take appropriate measures, such as reporting to the Company and obtaining the necessary approval, in accordance with Company Policies and Procedures.

5.5 Public Release

NTT DATA Group always demonstrates the value of NTT DATA Group in order to improve its presence in various countries and regions around the world, and endeavors to further the NTT DATA Group's brand promotion through communication with various stakeholders.

For appropriate information dissemination, NTT DATA Group provides consistent, accurate, and transparent information through newspapers, magazines, TV, websites, social media (including but not limited to Twitter, Facebook, LinkedIn, YouTube, Instagram and blogs) and other media.

When communicating information (including but not limited to posting on social media), we will comply with Company Policies and Procedures, applicable agreements and applicable laws and regulations, and not discriminate, harass, making false statements, divulging confidential information, violating privacy or infringing intellectual property rights.

Even when we communicate information personally, we understand our statements and views may have a negative impact on brand and reputations of NTT DATA Group. We will communicate our personal statements and views appropriately in accordance with Company Policies and Procedures, applicable agreements and applicable laws and regulations, not to be regarded as official statements and views on behalf of the Company. Further, we take personal responsibility for our own statements and views.

5.6 Reporting Concerns

In order for NTT DATA Group's Code of Conduct to be effective and for NTT DATA Group to develop soundly while gaining social trust, NTT DATA Group thinks it is important that each of us speak up and help improve the situation. Therefore, NTT DATA Group has established an internal reporting system so that Employees who discover any alleged or potential wrongdoing can report the details of it without being subjected to any disadvantageous treatment.

If we find or suspect any wrongdoing, we are encouraged to report to the contact point in accordance with the reporting procedures designated by each Company. Examples of wrongdoing include, but are not limited to:

- Violation of laws and regulations in conducting business at Company
- Acts that violate NTT DATA Group Code of Conduct or the Code of Conduct of each Company
- Other acts that significantly impair the reputation or society's trust in Company

NTT DATA Group accepts reports under real names or anonymously at the contact point of Company. The identity of the whistleblower, details of the report and the information obtained from the investigation will be treated as confidential, and only disclosed to the relevant parties to the extent specified in applicable laws and regulations and the Policies and Procedures of each Company, and used only for the purposes specified in such laws and regulations and the Policies and Procedures. NTT DATA Group will not, in any way, retaliate against the whistleblower who acted in good faith.



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NTT DATA Corporation
<https://www.nttdata.com/global/en/>