

NTT DATA Group Whistleblowing Policy

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Article 1 (General Rules)

1. This policy sets forth basic principles for NTT DATA Group Company to establish and operate the whistleblowing system.
2. The following terms used in this policy have the meanings set forth below.
 - (1) NTT DATA Group: NTT DATA Group Corporation which is located in Tokyo, JAPAN
 - (2) Unit: an operation company that manages each region or solution which is defined by NTT DATA Group for group management purpose (Unit HQ) and its group companies defined in the NTT DATA, Inc. Group Agreement between NTT DATA, Inc. and the Unit HQ
 - (3) NTT DATA Group Company: NTT DATA Group and its subsidiaries
3. NTT DATA Group Company shall be responsible for establishing and operating a whistleblowing system that conforms to this policy. The whistleblowing system operated by each NTT DATA Group Company shall be referred to "Whistleblowing System of Each Company".
4. NTT DATA Group Company may delegate the establishment and operation of its whistleblowing system to NTT DATA Group or Unit.
5. Each NTT DATA Group Company shall make its own rules for the operation of the Whistleblowing System of Each Company ("Rules of Each Company") consistent with this policy unless such NTT DATA Group Company delegates the operation to the whistleblowing system of NTT DATA Group or Unit, in any case subject to and unless otherwise required mandatory provisions under applicable laws.
6. NTT DATA Group Company shall not unreasonably deviate from or invalidate this policy in establishing and revising the Rules of Each Company.

Article 2 (Fundamental Concepts)

1. Compliance with laws, internal rules, and code of conduct is a prerequisite for the sound growth of NTT DATA Group Company while building trust from society.
2. Whistleblowing by all employees plays a very important role to identify, investigate and mitigate the risk of non-compliant activities that could cause liability and/or a reputational damage of NTT DATA Group Company since such activities are difficult to detect for those not involved in such activities.
3. NTT DATA Group Company shall establish, operate, and continuously improve the whistleblowing system based on the concepts set forth in the preceding paragraphs in order to adhere to compliance and to build a comfortable working environment for all employees.

Article 3 (Eligibility for Use)

Eligible users are all directors, officers, employees, contractors, and suppliers of NTT DATA Group Company; provided, however, other personnel may be added in accordance with the Rules of Each Company.

Article 4 (Reportable Acts)

Whistleblowing System of Each Company shall be used by Eligible Users when they recognize actual or suspected misconduct that falls under any of the following ("Reportable Acts"). Reportable Acts may be added in accordance with the Rules of Each Company.

- (1) Violation of laws and regulations in the performance of business activities of NTT DATA Group Company
- (2) Violation of NTT DATA Code of Business Ethics and code of conduct of NTT DATA Group Company
- (3) Any other conducts that seriously impairs the honor or social reputation of NTT DATA Group Company

Article 5 (Anonymous Reports)

1. Whistleblowing System of Each Company shall accept a report identified with real names or a report made anonymously.
2. It is recommended to report with real names in order to help the relevant NTT DATA Group Company to carry out effective investigations and take appropriate measures. It should be noted that an anonymous report may be subject to the following potential limitations:
 - (1) Reported facts may not be treated as a whistleblowing report due to insufficient ability to confirm the facts;
 - (2) Due to the lack of identification of the person who makes the report ("Whistleblower"), sufficient investigation and measures may not be ensured, and retaliation against the Whistleblower may not be recognized; and
 - (3) Provision of information pursuant to Article 10 may not be made to the Whistleblower.

Article 6 (Confidentiality)

1. The identity of the Whistleblower, content of report and information obtained through investigation ("Reported Information") shall be disclosed exclusively to the persons and departments stipulated in the Rules of Each Company.
2. Reported Information shall be used exclusively for purposes stipulated in the Rules of Each Company.

Article 7 (Protection of Whistleblower)

1. NTT DATA Group Company is, except as provided in Article 8, engaged and strongly committed to protect bona fide whistleblowers and shall not intimidate, discriminate, dismiss, or retaliate against the Whistleblower for the reason that the Whistleblower has made the report.
2. In accordance with employment rules, employment contracts, etc., NTT DATA Group Company may take disciplinary action against any person who has retaliated against the Whistleblower or harassed the Whistleblower.

Article 8 (Report for False Purpose)

Whistleblowing System of Each Company shall not accept a report that is made for the purpose of inflicting damage on NTT DATA Group Company or a third party or other false purposes, including examples below. If such report is malicious, NTT DATA Group Company may take a disciplinary action in accordance with employment rules, employment contract, etc.

- (1) Report for the purpose of libel or slander by grudge
- (2) Mere mischief
- (3) Facts that are related solely to the private lives of others that are not relevant to the business
- (4) Others equivalent to (1) through (3) above

Article 9 (Response to Reporting)

1. When a report is received by a department in charge of the Whistleblowing System of Each Company, the department shall promptly take appropriate measures in accordance with the content and nature of the report except for the following cases:
 - (1) Content of the report is merely a simple expression of opinion by the Whistleblower; or
 - (2) No particular measure is deemed necessary even if the content of the report is supposedly true.
2. In the operation of the Whistleblowing System of Each Company, each company shall pay careful attention to conflicts of interest when responding to reports. Under the Whistleblowing System of Each Company, each NTT DATA Group Company shall ensure that the person against whom a report is made shall not be involved in responding to the report.

Article 10 (Feedback to Whistleblower)

1. In principle, certain information on the response to the report, such as the outcome of the investigation, shall be provided to the Whistleblower.
2. The feedback to the Whistleblower may be limited in the case of an anonymous report, in the case of the retirement of the Whistleblower, in the case where confidential matters exist in the response to the report, or for other reasons.

Change History

Version	Date	Chapter	Description
1.0	September 21, 2021	-	Newly established.
1.1	May 12, 2022	Article 4	Replace NTT DATA Global Compliance Policy with NTT DATA Group Code of Conduct
1.2	July 1, 2023	Article 1	Change the definition of “NTT DATA(HQ)” and “NTT DATA Group Company” with the change on the group formation and the company name
1.4	July 1, 2025	Article 4	Replace NTT DATA Group Code of Conduct with NTT DATA Code of Business Ethics

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