

# Modern Slavery & Human Trafficking Statement

29 July 2024

NTT DATA UK Ltd.  
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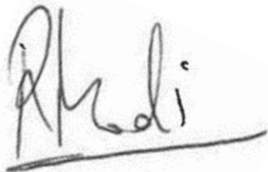
## 1. Introduction from the CEO, NTT DATA UK Ltd.

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.

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.

This statement highlights the key activities we have undertaken during this financial year to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

This Modern Slavery and Human Trafficking Statement is published in line with section 54(1) of the Modern Slavery Act 2015 and relates to the financial year ending 31st March 2024.

A handwritten signature in black ink that reads 'Rajul Modi'. The signature is written in a cursive style and is underlined with a single horizontal line.

Rajul Modi, Chief Financial Officer and Deputy CEO, NTT DATA UK Limited

25 July 2024

## 2. About NTT Group and NTT DATA UK Ltd.

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 1,500 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.

### 3. Our Values and Commitments

Our people are our most valued asset and NTT DATA UK is committed to cultivating an environment where every individual feels appreciated, encouraged, and empowered to thrive. Our dedication to upholding high ethical standards includes promoting transparency, accountability, and nurturing a culture of integrity.

Our Code of Ethics and Professional Conduct applies to all NTT DATA UK employees and guides our actions in conducting business, highlights our support and respect for human rights, including our commitment to ensure that modern slavery and human trafficking is not taking place in our supply chains or in any part of our business, and encourages reporting of any suspected breaches through the [NTT DATA EMEAL Group Whistleblowing Reporting System](#).

NTT DATA UK Limited expects all our employees to act in accordance with the principles and values outlined in our Code of Ethics and Professional 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.

## 4. Our Policies on Modern Slavery & Human Trafficking

NTT DATA UK is committed to the principles of the Modern Slavery Act 2015 and there are several Policies that help us manage our modern slavery risk:

- **Code of Ethics and Professional Conduct of NTT DATA EMEAL Regional Unit:** 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 the 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.
- **NTT DATA Corporation Suppliers Code of Conduct (NTT DATA Group Guidelines for Sustainability in Supply Chain):** NTT DATA Group asks all our suppliers to understand, endeavor to understand, and cooperate with these Guidelines, comply with applicable laws, respect human rights, maintain Health & Safety standards, engage in fair trade, protect the environment, and act in an honest and ethical manner.
- **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 NTT DATA UK Limited, the supplier shall be suspended or barred from doing business with NTT DATA UK Limited.

All the Policies are readily available to all NTT DATA UK employees on our Compliance Intranet page. We regularly review and update our Policies to ensure they remain compliant, consistent, and effective.

NTT DATA UK Limited expects all our employees to act in accordance with business values and principles outlined in our Code of Ethics and Professional Conduct and other internal Policies. Failure to comply with any of these Policies is taken very seriously and can result in disciplinary action

## 5. 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.

Together with our suppliers, we strive to ensure that our supply chains operate in an honest, fair, and transparent manner, free from forced labour, slavery, and servitude.

To date, we have not been made aware of any complaints or allegations of human trafficking or slavery activities against any of our suppliers, through the NTT DATA EMEAL Group Whistleblowing System or otherwise. 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.



## 6. Our Supplier Requirements

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.

Under NTT DATA Corporation Suppliers Code of Conduct (NTT DATA Group Guidelines for Sustainability in Supply Chain), we require that our suppliers:

- Shall not use labour obtained by coercion, detention, slavery, or human trafficking.
- Shall respect the human rights of workers, and shall not subject them to inhumane treatment, such as mental or physical abuse, coercion, harassment, or any acts that could potentially be inhumane treatment.
- Shall not employ children who are under the minimum working age as defined by the International Labour Organization or as defined by the local law.
- Shall comply with all applicable legislation regarding compensation (including minimum wage, overtime pay, and legally mandated allowances and wage reductions) paid to workers. Also, suppliers shall consider paying wages at a level that can cover the necessities of life (living wage).
- Shall not allow workers to work beyond limits defined by legislation in the area where they work and shall appropriately manage the working hours and holidays of workers with consideration for international standards. Furthermore, suppliers must grant working hours, holidays, and breaks to workers appropriately based on the legislation of each country.
- Shall comply with local legislation, and respect workers' rights to freedom of association and collective bargaining.
- That supply raw materials and parts or provide services shall conduct human rights due diligence as necessary in order to check that there are no violations.

## 7. Risk Assessment and Management

As a professional services firm, the risk of modern slavery or human trafficking occurring within our business is low, when compared to other industries. However, NTT DATA UK Limited recognizes the challenges around modern slavery in complex global supply chains and is committed to operate an effective supply chain governance framework and minimize the risks of modern slavery associated with goods, works, and services we purchase.

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.

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.

## 8. Training and Awareness

All NTT DATA UK Limited employees are required to read and comply with our Code of Ethics and Professional 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 Ethics and Professional Conduct makes it clear that all our employees have a responsibility to use our [NTT DATA EMEAL Group Whistleblowing Reporting 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.

To raise awareness of modern slavery, we have implemented mandatory employee training with a focus on the principles outlined in our Code of Ethics and Professional Conduct and other mandatory Policies. In addition, NTT DATA UK requires all new employees to undertake mandatory induction training.

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.

## 9. 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.

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.

## 10. 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.