

Code of Ethics and Professional Conduct of *NTT DATA EMEAL* *Regional Unit*

March 2024



Index

Presentation of the Code of Ethics and Professional Conduct **of the CEO of** NTT DATA EMEAL Regional Unit

01	Purpose and scope of application	05
02	Vision and Values of <i>NTT DATA EMEAL</i>	08
03	Key Conduct Principles	10
04	Complaints channel (<i>Whistleblowing System</i>)	29
05	The NTT DATA EMEAL Compliance Committee and the Compliance & Risk Management Department	30
06	Compliance with the Code of Ethics and Professional Conduct	31

Presentation of the *Code of Ethics and Professional Conduct* of the CEO of *NTT DATA EMEAL Regional Unit*

The entities that are part of *NTT DATA EMEAL Regional Unit* (hereinafter, "*NTT DATA EMEAL*") are primarily People-oriented organisations. Our high degree of trust in each of them, together with the strong technical capabilities available globally, the provision of high-quality services, and a work environment that is committed to the highest levels of personal integrity, are key factors of success for all of us, even in the most difficult market conditions. From the senior management of *NTT DATA EMEAL*, we would like to thank you for your professional contribution in providing excellent IT services and in meeting the needs and expectations of our clients, suppliers, business partners, and other groups of interest to achieve sustainable businesses with positive impact.

Therefore, it is essential that each of us commits to carrying out our business activity in accordance with the highest ethical principles, which meet Environmental, Social and Governance (hereinafter, "ESG") requirements, and to comply with all applicable laws in the various jurisdictions in which we operate.

To promote this relevant commitment, the Board of Directors of the parent holding entity of *NTT DATA EMEAL* has updated these global standards to align business behaviour with our Core Values and good practices, in line with the principles sustainability and good corporate governance, Compliance criteria and guidelines, and risk prevention, transferred by our Japanese parent company, NTT DATA GROUP CORPORATION.

Each entity of *NTT DATA EMEAL*, and the People who make it up, must comply with this *Code of Ethics and Professional Conduct*, and with the Complementary Provisions with which it can be harmonised locally, consistent with legal requirements in each jurisdiction in which we operate.

It is important to highlight that the *Code of Ethics and Professional Conduct* and the Complementary Provisions of each country are designed to protect each of our Entities, and us as individuals, from exposure to risks that could be related to crimes and other corporate illicit actions (considering the potential associated sanctions), in accordance with the various applicable laws of the geographical area in which we are located.

Consequently, at *NTT DATA EMEAL* we require that each entity, and all of us, immediately comply with the principles established in this text.

The Board of Directors of *NTT DATA EMEAL* is firmly committed to “setting the standard” in ethical behaviour aligned with our Values, corporate compliance and, in particular, the principle of zero tolerance for any type of breach of current legislation or our principles, especially in the field of preventing criminal risks, such as corruption and bribery, money laundering, violations of Human Rights, anti-competitive conduct and tax fraud or evasion.

From *NTT DATA EMEAL* we hope that the People who are part of it (hereinafter, “the People of *NTT DATA EMEAL* as administrators, directors or employees in general , as well as our business partners and other stakeholders with whom we interact, in all the Group’s countries, follow and effectively comply with the key principles of ethical conduct and commercial integrity and all other provisions of this *Code of Ethics and Professional Conduct*.”

Thank you for your attention and collaboration.

Chieri Kimura

NTT DATA EMEAL CEO



1. Purpose and scope of application

1.1. Objective

This *Code of Ethics and Professional Conduct* (hereinafter referred to as “the Code”) constitutes the principles and fundamental basis by which all people who are related to *NTT DATA EMEAL*, under any scope or connection (hereinafter, referred to as “the People related to *NTT DATA EMEAL*”), we must govern our activity, regardless of the entity in which we operate. Therefore, the essential purpose of the Code is to determine the Values, principles and standards that must govern our actions in the context of our activities at *NTT DATA EMEAL*.

1.2. Scope of application

General

The Code has been formally approved by the Board of Directors of *NTT DATA EMEAL*, as a necessary action guide for the Entities within its control perimeter. It is mandatory and applicable to each entity that is part of *NTT DATA EMEAL* (hereinafter, referred to as “the *NTT DATA EMEAL* Entity” or simply “Entity”), all of them located in both Europe and Latin America, as well as where they can carry out activities related to said perimeter, and binds all of us, whether we are administrators, managers or employees, regardless of the position we occupy and the function we perform.

In accordance with the above, the Code expresses the engagement of *NTT DATA EMEAL* to operate not only in accordance with current legislation, but also in accordance with its principles and Values, and each Entity, and People related to *NTT DATA EMEAL* are expected to comply with them accordingly.



NTT DATA EMEAL Entities

Each Entity of *NTT DATA EMEAL* may introduce additional content or standards in accordance with the legal requirements of the jurisdiction in which it is located or as suggested by good practices, or to the coverage of certain exceptions or local singularities based on said legal requirements (hereinafter, "Complementary Provisions"), which must always be aligned with the contents of this Code.



The eventual Complementary Provisions will contemplate, at a minimum:



The establishment of a Compliance & Risk Management Head at the local level (eligibility criteria, role, and functions, contact details).



Reference to applicable local statutory laws with rules referring to the prevention of any type of legal non-compliance and especially crimes, such as, among others, those linked to corruption and bribery, money laundering, violation of Human Rights, conduct contrary to competition rules and fraud or tax evasion.



The reference to country-specific policies or procedures or other internal regulations in force at the level of the corresponding Entity.



Therefore, each Entity of *NTT DATA EMEAL* is required to adhere to (or formally adapt) the Code *and develop* Complementary Provisions, when necessary.

Likewise, the Complementary Provisions must provide adequate information to local corporate governance bodies, to the extent required by legal provisions, emphasising that:

- The locally adapted Code refers to country-specific standards to comply with local legal requirements.
- Appropriate formal approval of the Code, together with the country's Complementary Provisions and appropriate awareness and training actions for administrators, managers and employees, as well as any business partner or third party, are essential to protect each Entity of exposure to risks related to crime and other corporate violations (along with their associated sanctions), in the broad geographic area in which *NTT DATA EMEAL* operates.

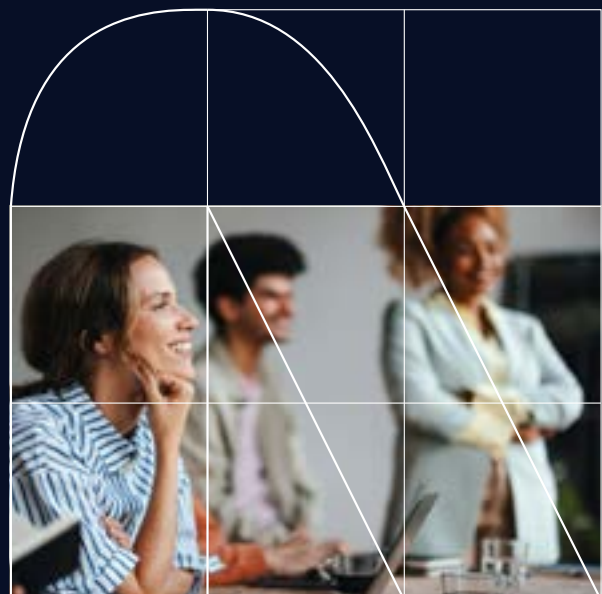
Once approved and disseminated internally, the resulting Code will be binding on all of us as People of *NTT DATA EMEAL*, whether we are administrators, directors, or employees of any Entity.

Whenever there are differences between what is established in the Code with its adaptations with respect to the applicable local regulations, the most restrictive regulation will prevail, unless this contravenes the corresponding local regulations or there are reservations for reasons of public interest.

Business partners and other stakeholders

We expect that all of our suppliers and other third parties, including People and Entities with whom we do business or who support *NTT DATA EMEAL*, such as service providers, consultants, agents, distributors, intermediaries, contractors, suppliers (hereinafter referred to as "business partners"), are aligned with the principles contained in the Code. From *NTT DATA EMEAL* we will actively seek the said engagement and will report circumstances in which there is a suspicion or possible infringement, by said third parties, in compliance with the standards set in this Code.

In the same sense and with respect to other interest groups or stakeholders with whom *NTT DATA EMEAL* may maintain some type of relationship, identified in the exercise of double materiality, such as non-governmental organisations, foundations, associations and academic institutions, among others, must also pay attention to the provisions of this Code, as it affects such relationships, collaboration and exchange, that link them with *NTT DATA EMEAL*.



2. Vision and Values of *NTT DATA EMEAL*

As *NTT DATA EMEAL* and as individuals, we think about what we do, act differently and transform our business to drive a better future for our company and for society.

Our Vision

Our Group Vision is based on three messages:

1



We build long-term relationships with our clients and enable them to achieve their highest goals and aspirations.

2



We create ecosystems and solutions in constant evolution, through advanced technology.

3



We enhance our creativity through respect and promotion of diversity and inclusion at all levels of our company.

At *NTT DATA EMEAL* we promote an evolved group vision, Trusted Global Innovator, which reflects the evolution of the company beyond what is represented by Global IT Innovator.

Our Vision lays a solid and firm foundation for what is a highly unpredictable environment, where business models will change rapidly in response to technological advances. Through our unwavering engagement, serving as a trusted long-term partner, we will earn the trust of our customers by partnering with them to combine innovative ideas with cutting-edge technologies.

Our Values

An important step to work together and achieve the corporate transformation established in our Group Vision is to establish the Values that we value and seek to share. These Values are the following:



Customers First: the needs of our customers come first and foremost. We continually work to understand your business and strive to resolve each concern until you are satisfied. We feel a responsibility to ensure your 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 the challenges ahead. We consider the future of IT as well as the future of business, working to improve our ability to imagine the future and, with our ecosystems and solutions, adapt to the changing business environment. In this way, we help meet objectives and create a better future for society.



Teamwork: we place great importance on enabling our People to achieve their best through working together. We believe that when a diverse and synergistic group brings together their unique world views, shares their capabilities and wisdom, and works toward a common goal, the results are extraordinary and far beyond what can be achieved individually.



3. Key Conduct Principles

The following rules (hereinafter referred to as “Principles”) underlie the Code and set guidelines for our actions, especially in the area of Compliance and, more specifically, in corporate compliance, mainly to prevent any illicit activity, especially in the criminal sphere, such as corruption and bribery, money laundering, violations of Human Rights, contravention of regulations in competition matters, activities related to tax evasion and other possible corporate infractions.

At *NTT DATA EMEAL* we have the duty to communicate the standards of ethics and conduct, established in the Code, to all People at *NTT DATA EMEAL*.

In this context, we ask each person to read, understand and comply with these Principles, as well as any other Complementary Provisions of the country where they operate. In this sense, those responsible for the Entities of *NTT DATA EMEAL* will ensure that all People under their supervision are informed about the provisions of the Code, its local adaptation, and the applicable Complementary Provisions of the country; and are periodically reminded of the importance, without fear of reprisals.

3.1. Compliance with applicable laws and Complementary Provisions

- In each Entity of *NTT DATA EMEAL*, we must observe all laws, regulations and requirements required at the international, European, and national level.
- Additionally, in each *NTT DATA EMEAL* Entity we must issue, when applicable, Complementary Country Provisions for the above purposes.



3.2. Respecting 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.

It is essential that each Entity of *NTT DATA EMEAL*, regardless of the country in which it operates, act diligently and responsibly to prevent, detect or mitigate situations that may compromise the Human Rights, in accordance with the existing internal Global Policy, as well as that we avoid negative environmental impacts in its value chain, whether they occur in the context of its activities or in those entrusted to business partners.

3.3. Our work environment

Engagement to talent

At *NTT DATA EMEAL* we promote the development of our People, making our best efforts, going beyond purely professional obligations.

We are proud and enriched by the diversity of our staff and the uniqueness of each of our professionals, which is why we promote key initiatives such as those considered in our global Diversity and Inclusion Policy.

Furthermore, in terms of training, at *NTT DATA EMEAL* we have promoted training programs so that our employees can continue to develop their full potential, and we support the participation of our People in congresses, conferences or seminars; We promote the publication of articles, studies and books, as well as the teaching of courses on any subject in which they have special knowledge and interest; provided that information that may constitute a business secret, confidential or restricted of clients, other third parties, or *NTT DATA EMEAL*.

Engagement to quality and innovation

At *NTT DATA EMEAL* we pursue the achievement of maximum satisfaction for all our opinion leaders and clients, providing products and services of the highest quality that anticipate and respond to their needs.

In accordance with the criteria of our quality system, we expect that all People of *NTT DATA EMEAL*:

- ✓ Focus your activity on satisfying customer needs, providing maximum value, mainly through innovation and constant active listening.
- ✓ They commit to the daily practice of continuous improvement, forcing themselves to comply with established quality standards.
- ✓ Carry out activities to prevent operational errors and focus on production without deficiencies, as a way to maximise quality.
- ✓ Demonstrate willingness and active collaboration to optimise the management of work processes.

Concern and commitment to quality is the responsibility of all of us. Therefore, we share knowledge to create a common business culture that allows us to adapt to new business demands, while contributing to reducing costs and improving efficiency and competitive position in the market, in accordance with the most appropriate standards and approved practices.



3.3.1. Equal opportunities

At *NTT DATA EMEAL* we promote fair and equitable treatment of our People and provide employment opportunities on the basis of individual merit, in accordance with our global Diversity and Inclusion Policy, and with laws and Regulations Complementary to each country, as appropriate.

The Company has a wide range of actions aimed at improving the health and well-being of People who work at *NTT DATA EMEAL*, which are adapted into initiatives and programs in different countries to facilitate work-life balance.

3.3.2. Commitment against discrimination, harassment, hatred, and violence

At *NTT DATA EMEAL* we are committed to treating all people with dignity and respect and do not tolerate any type of harassment, hateful conduct, or violence, regardless of position, and whether the person is an employee, client or business partner of *NTT DATA EMEAL* in any of its Entities.

At *NTT DATA EMEAL* we strive to maintain a safe and productive professional work environment that is free of this misconduct by prohibiting participation in any activity that results in it, including those of People from *NTT DATA EMEAL*, as well as employees of clients and business partners.

To that end, at *NTT DATA EMEAL* we condemn and do not tolerate discrimination against our People or candidates based on race, religion, sexual status, national origin, disability, age, genetic information, ancestry, marital status, or any other basis protected by applicable laws, national, European, or international.

NTT DATA EMEAL's non-discrimination policy applies to recruiting, hiring, training, compensation, benefits, promotion, transfer, termination and all other terms, conditions, and privileges of employment.

3.3.3. Health and safety obligations

At *NTT DATA EMEAL* we strictly comply with the obligations of safety, health, protection, and hygiene at work, according to applicable laws, with the aim of keeping our People as safe as possible within the facilities and *NTT DATA EMEAL* work areas. We have a strategy and specific action plans for the prevention of occupational risks for each of the businesses, aligned with the current legislation of each country.

3.3.4. Drugs and other substances

It is not permitted to work having consumed any substance that has unwanted side effects, as well as any type of drugs. In the case of medications that may affect work safety, we must consult the medical services and/or the People Department of the corresponding *NTT DATA EMEAL* Entity.

3.4. Zero tolerance of crimes

At *NTT DATA EMEAL* we do not tolerate any crime. In particular, crimes linked to corruption, bribery and all forms of extortion. It is prohibited to influence the will of third parties, or induce them, whether or not they are public officials, in order to obtain any type of influence, advantage or favourable treatment, for *NTT DATA EMEAL* or for oneself, through any type of payment or consideration, directly or through third parties. In the same sense, said prohibition will apply when said influence or induction occurs towards directors or employees of *NTT DATA EMEAL*.

3.4.1. Gifts, gratuities and equivalents

We do not allow the delivery, offer, or promise of any gift or advantage that could influence or receive favourable treatment in any corporate or business activity that may link *NTT DATA EMEAL*, unless we comply all the conditions indicated below:

- That is reasonable and proportional in quantity/value and, in any case, does not exceed the monetary limit established by law, in the general global policy of *NTT DATA EMEAL*, regarding Gifts and Hospitality, or the amount established in the Complementary Provisions of the country where it occurs.
- That is recorded with a detailed explanation, together with evidence of written authorisation, according to the specific Complementary Provisions of the corresponding country.
- That it is not in cash or in other means or non-nominative bearer titles, which prevent their traceability.





Relations with public officials and members of the public sector

At *NTT DATA EMEAL* we cannot make deliveries, offers or promises, regardless of their value or amount, to public officials, agents or employees of the public sector, or to other related third parties, such as their close relatives or People with affinity relationship.

Any exception or singularity must be approved in writing, with due justification, in accordance with local regulations and country-specific policies, by the CEO of the *NTT DATA EMEAL* Entity, after informing the person responsible. of the Compliance & Risk Management Department, either at the local level and/or at the *EMEAL* level, as appropriate.

Reception of gifts, gratuities and equivalent things

If any person at *NTT DATA EMEAL* is approached with a delivery, offer or promise, which is not of insignificant value, or which is not considered reasonable by local internal policies, we must politely reject or return it but firm, when it can reasonably be interpreted as a way to induce inadequate performance or to obtain or retain business, or a personal advantage in conflict of interest with *NTT DATA EMEAL*.

The monetary value limits and information obligations will be established, in any case, in the general global policy of *NTT DATA EMEAL*, regarding Gifts and Hospitality, or in the Complementary Provisions of the country.

Any exception must be approved in writing, with due justification, in accordance with the Complementary Provisions of the country or by the CEO of the Entity of *NTT DATA EMEAL*, prior information to the Compliance & Risk Management Department, at local and/or *EMEAL* level, as appropriate.

3.4.2. Meals and other business-related hospitality expenses

NTT DATA EMEAL People may, in the ordinary course of business, provide or accept business meals, entertainment, hospitality or travel for a reasonable and proportionate amount (including, but not limited to, attendance at sporting or cultural events) as long as they are associated with a lawful commercial activity, are not recurring, cannot be interpreted as being carried out with the purpose of influencing or inducing inadequate performance, and are approved and duly registered and registered, all this without prejudice to the exceptions and singularities that apply as established in this Code.

3.4.3. Registration

Any permitted gift, including a discount or other advantage, must be properly registered in accordance with the Complementary Provisions that may be established in each country.

3.4.4. Donations and contributions to political organisations, unions, and equivalents

No *NTT DATA EMEAL* Entity shall, directly or indirectly, give, offer, or promise any donation or sponsorship fee in any form, to any political organisation, union or equivalent.



3.4.5. Donations and contributions to non-profit organisations

Charitable donations to non-profit organisations and/or initiatives related to corporate social responsibility made by *NTT DATA EMEAL*, or its Entities will be awarded in line with *NTT DATA EMEAL*'s ESG and Sustainability strategy or of each Entity, and will be subject to compliance with all the following conditions:



- That the organisations are of recognised prestige and ethical behaviour, and have an appropriate organisational structure to guarantee the good administration of the resources provided.
- That organisations comply with the applicable legal requirements, including being registered in the corresponding registry, when this exists.
- That are not intended to induce performance inappropriate or obtain or retain business, or an advantage, in the conduct of the company's business.
- That do not exceed the monetary limit established as a general, global criterion, by *NTT DATA EMEAL* or the amount established in the Complementary Provisions by country and must in any case comply with the appropriate legal requirements.
- That its tax treatment is in accordance with local legal provisions related to the taxation of such contributions.
- That the Compliance & Risk Management Department of *NTT DATA EMEAL* be informed at the local level and/or at the EMEAL level, as appropriate.

Donations in cash or bearer media are always prohibited.

3.5. Conflicts of interest

Scope

A conflict of interest occurs when personal interest interferes, or is perceived to interfere, with the interests of *NTT DATA EMEAL*. One of us, or our family members, or a person with whom we maintain some type of relationship, may adopt decisions, or conduct, or have an interest or possible benefit, that prevent the performance of the duties and responsibilities of *NTT DATA EMEAL*, in an honest, objective, and effective manner. The term “family members” includes, but is not limited to, parents, siblings, people united in marriage or equivalent emotional relationship, or other members who live in the home of the person in conflict.

Below are various activities and situations in which situations that imply conflicts of interest may arise, and which must be communicated and managed appropriately, in accordance with the internal protocols and procedures that are applicable to each Entity.

3.5.1. Activities outside the company

The People of *NTT DATA EMEAL* must not carry out activities outside the workplace in competing companies that enter into a conflict of interest, or interfere with our responsibilities or dedication, with the activity of the Company and that we carry out in any Entity of *NTT DATA EMEAL*.



3.5.2. Activities in favour of the community

People of *NTT DATA EMEAL* must ensure that when we volunteer in charitable, civic, and public service organisations, or any participation in a political process, these activities do not pose a real or perceived conflict of interest with our employment at *NTT DATA EMEAL*.

3.5.3. Relationships with other employees

Due to the possibility of conflicts of interest, our family members or anyone with whom one of us has a close personal relationship, such as marriage or equivalent emotional relationship, should not work in positions that have a relationship of supervision and direct reporting to each other, or who occupy a position/role in the same line of reporting where one person can make decisions that affect the other.

3.5.4. Relationships with third parties

In dealing with our suppliers, potential suppliers, customers, and members of the financial community (such as underwriters and analysts), the People of *NTT DATA EMEAL* may not engage in any activities that implies or appears to generate a conflict between your personal interests and the interests of *NTT DATA EMEAL*.

The business partners of *NTT DATA EMEAL* also have the obligation to avoid any behavior that may violate their independence of action, subjecting themselves to the applicable regulations, and then adopting the necessary measures to avoid making affected decisions due to possible conflicts of interest.



3.6. Compliance with information security regulations and internal policies

At *NTT DATA EMEAL* we make available to our People, the means, and resources necessary to carry out our professional activity. Its use must be (i) in accordance with the law, the internal Policies, and, especially, the existing Global Information Security Policy, and the Complementary Provisions, (ii) as well as efficient, putting appropriate measures in place to prevent its use, misappropriation, loss, theft, damage, or malfunction.

3.6.1. Protection of personal data

At *NTT DATA EMEAL* we comply with the applicable data protection and privacy laws, and with the country's Complementary Provisions on this matter, in accordance with the following criteria:



Lawfulness, loyalty, and transparency: personal data must be processed in a lawful, fair and transparent manner in relation to the interested party.



Purpose limitation: personal data must be collected for specific, explicit, and legitimate purposes and must not be processed in a manner incompatible with those purposes.



Data minimisation: the processing of personal data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.



Accuracy: personal data must be accurate and, where necessary, kept up to date; All reasonable steps must be taken to ensure that personal data that is inaccurate, taking into account the purposes for which it is processed, is deleted or rectified without delay.



Limitation of storage: preserved in a format that allows the identification of the interested parties for no longer than necessary for the purposes for which the personal data are processed.



Integrity and confidentiality: personal data must be treated in a way that adequately ensures its security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.



Accountability: the person responsible for processing personal data assumes this responsibility and will be able to demonstrate compliance with the above principles.

These criteria will apply, even if the professional relationship with *NTT DATA EMEAL* or any of its Entities with the affected subject has ended.



3.6.2. Industrial and intellectual property

The proper management of industrial and intellectual property is a strategic objective for *NTT DATA EMEAL* as a company focused on innovation. To support the evolution of *NTT DATA EMEAL* towards a service and asset-based business model and, as the scope of business activities expands globally, the protection of our industrial and intellectual property has become a priority.

At *NTT DATA EMEAL* we protect our industrial and intellectual property, which includes any type of invention, development, engineering, software assets, hardware, databases, original content or material susceptible to copyright protection (deliverables, reports, use cases, presentations, web pages, articles, etc.), know-how, distinctive signs, logos, symbols, names and images used in commerce, designs and, in general, any confidential information that is relevant to the business. The rights used to protect this content include copyrights, invention patents, industrial designs, trademarks, and trade secrets.

All creations and inventions made by the People of *NTT DATA EMEAL* in the exercise of their duties and with company resources belong, or are transferred, exclusively to *NTT DATA EMEAL* or to the Entity in which they carry out their work, to the extent prescribed by the applicable laws and regulations and in the Complementary Provisions of each country.



We also respect intellectual property rights belonging to third parties and take measures to prevent infringement of such rights (for example, having unauthorised access to download and copy software of third parties without an official license). In particular, all software that is used as technological resources by *NTT DATA EMEAL* and its Entities is officially licensed software. Such software must always be used in accordance with its license terms and without infringing the rights of third parties.

People of *NTT DATA EMEAL* are invited to consult the applicable policies on intellectual and industrial property, as well as the Complementary Provisions of each country on this matter.

3.6.3. Emerging technologies, Internet, online services, and social networks

At *NTT DATA EMEAL* we provide our People with access to on-line services through the Internet. People of *NTT DATA EMEAL* are expected to use these services responsibly, avoiding any negative impact on business activities. We must respect the laws, internal regulations and the Complementary Provisions of each country.

Likewise, from *NTT DATA EMEAL* we demand that each Entity and the People that form it, comply with the policies that are established at any time on the correct use of Artificial Intelligence, to make ethical, safe and responsible use of it, in line with existing internal global policies.

Additionally, at *NTT DATA EMEAL* we respect our People's rights to reasonably use social media tools (e.g. LinkedIn, Twitter, Facebook, personal websites, web logs, etc.), provided that the use is responsible, reasonable and proportionate and does not compromise the security, performance and operation of IT assets and systems, nor the performance of the professional duties of People, in accordance with the provisions of this Code and the Complementary Provisions.



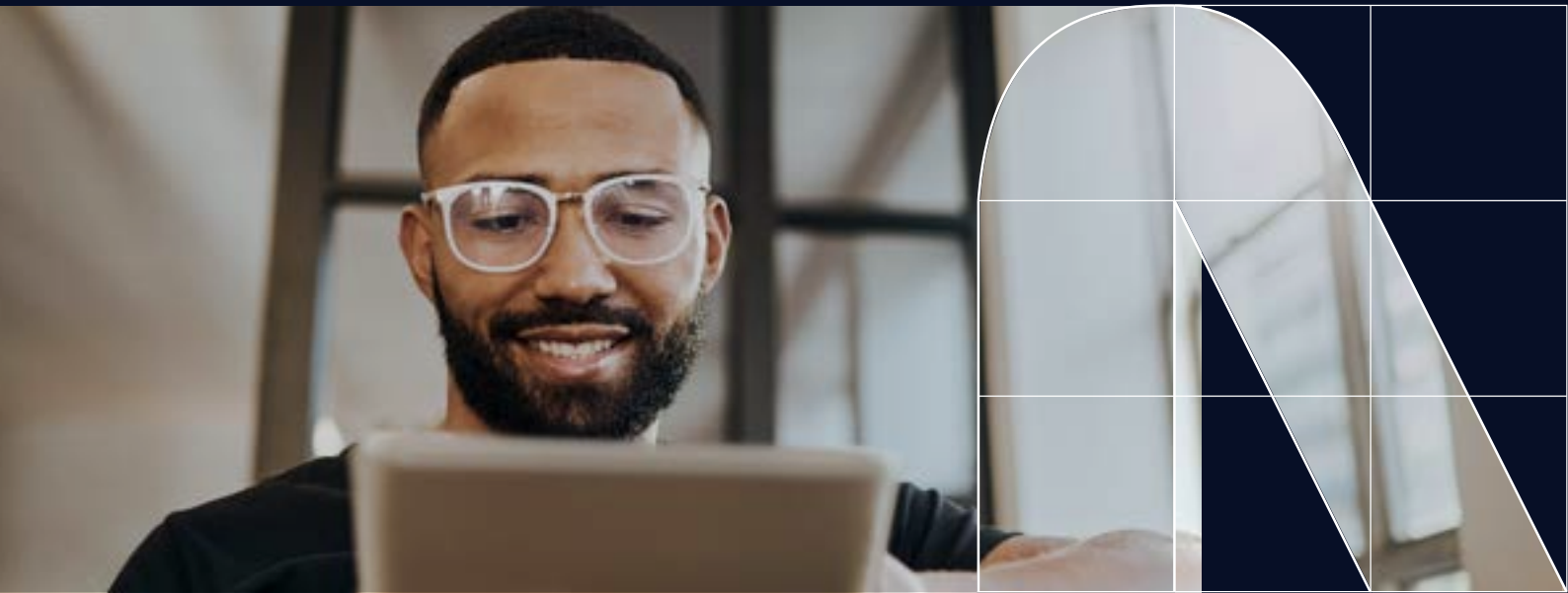
3.6.4. Classified information

At *NTT DATA EMEAL* we are very sensitive to the protection of business secrets and other internal, strictly confidential, and proprietary information, both of *NTT DATA EMEAL* and of third parties, including suppliers and customers.

Classified information refers to all information that is not in the public domain, which is generated, processed, or acquired by *NTT DATA EMEAL* or its People in the course of their activity. Unauthorised copying, use, disclosure, or circulation of classified information is strictly prohibited.

Each Entity of *NTT DATA EMEAL* will adopt the corresponding measures in accordance with our internal regulations and, where appropriate, Complementary Provisions, in organisational, technical, and legal terms, to protect classified information.

Any confidential information transmitted through *NTT DATA EMEAL* technological resources must be classified with a sensitivity label, in accordance with *NTT DATA EMEAL* security policies.



3.7. Business relationships

3.7.1. Customer relations

The People of *NTT DATA EMEAL* must always treat clients, and potential clients, in accordance with the highest standards of ethical conduct and commercial loyalty. Agreements with them must be carried out by People authorised to act on behalf of *NTT DATA EMEAL* or its corresponding Entity and remain within the limits established by this Code.

It is the criterion of *NTT DATA EMEAL* to always market its products and/or services based on its own merits and in fair competition, avoiding inappropriate, malicious, or derogatory comments about the competition's products and services.

3.7.2. Relationship with suppliers

The People of *NTT DATA EMEAL* must always treat suppliers and potential suppliers in accordance with the highest standards of ethical and business conduct. Likewise, relationships with suppliers must be carried out by People authorised to act on behalf of *NTT DATA EMEAL* or its corresponding Entity and remain within the limits established by the Code.

It is the discretion of *NTT DATA EMEAL* to qualify suppliers and select them based on objective criteria, such as value (quality for price), economic conditions, technical excellence, service reputation, production/service capacity, but also about their history and willingness to align with the Principles included in this Code.

3.7.3. Relationships with agents, intermediaries, representatives, distributors and consultants

For *NTT DATA EMEAL* our agreements with intermediaries, consultants, distributors, agents and representatives require compliance with the laws and this Code as well as the Complementary Provisions of each country. *NTT DATA EMEAL* requires prior validation and appropriate approval from management before entering into such agreements.



3.7.4. Agreements and transactions; contracts with the Public Sector and other engagements

No person of *NTT DATA EMEAL* is authorised to sign documents, contracts or agreements that bind any Entity of *NTT DATA EMEAL*, without the express authorisation of the representatives formally designated by the same, following the Complementary Provisions of the country, based on the Authorisation Matrix document of *NTT DATA EMEAL*.

At *NTT DATA EMEAL* we must be guided by the highest standards of honesty and integrity in our relationships with officials, agents, and employees of the public sector, knowing and obeying the laws and regulations applicable to commercial transactions with the Government and the public sector.

3.7.5. Business at an international level

At *NTT DATA EMEAL* we are committed to the highest standards of ethical and commercial conduct wherever we operate, observing with utmost diligence the international standards that affect its activity.

For this reason, the People of *NTT DATA EMEAL*, before conducting international business, must observe the laws and regulations that apply in the country where the business will be carried out, especially the guidelines on the prevention of corruption and bribery, the sanctions regime in accordance with international law, observe applicable licensing and import/export control requirements, as well as verify that all relevant approvals have been obtained.



3.7.6. Prohibition of facilitation payments to public sector officials/ employees

Unless expressly permitted by applicable law in a given operation or geography, "facilitation" payments, to obtain or expedite the performance of a routine act commonly performed by a public sector official, agent or employee, are strictly prohibited.



3.8. Insider information

At *NTT DATA EMEAL* we are committed to the safeguarding and exclusively legal use of privileged information.

Privileged information is considered any information of a specific nature that has not been made public and that, if made public, could influence, or would have influenced in an appreciable way the price of negotiable securities or financial instruments.

Insider information is not limited to information about *NTT DATA EMEAL*. It also includes material non-public information about others, including *NTT DATA EMEAL*'s customers, suppliers, competitors, and shareholders.

Insider trading includes, but is not limited to, trading securities with material non-public information and communicating non-public information to third parties. In this sense, using privileged information for any of these purposes has serious legal consequences, even if no financial benefit is received.

Therefore, all *NTT DATA EMEAL* People in possession of privileged information have the obligation to comply with the highest standards of confidentiality and not to share or make use of privileged information improperly, applying the security measures corresponding protection and security.

3.9. Defence of the competition

At *NTT DATA EMEAL* we observe the rules and principles of free competition in all the markets where we operate. We undertake to act fairly, avoiding any conduct that constitutes or may constitute an alleged anti-competitive practice, such as collusion, abuse of a dominant position or restriction of competition.

Antitrust laws prohibit entering into agreements, or discussing entering into agreements, with a competitor if the agreement restricts or seeks to alter competition by fixing or controlling prices, influencing bidding processes or rigging bids, dividing, and allocating markets, territories or customers, boycotting suppliers or customers, or by any other means.

Therefore, in no case may the People of *NTT DATA EMEAL* enter into the above agreements or engage in such anti-competitive practices.

Additionally, we must not engage in the following specific activities without prior review, where appropriate, by the Legal Departments of *NTT DATA EMEAL*:

- Share marketing plans or business or commercial policy issues.
- Present a joint offer or “partnership” with another company on commercial projects or opportunities.
- Work with competitors to establish industry-wide standards.
- Meet competitors in forums aimed at exchanging commercial and business experiences and information.
- Require a customer to purchase a product or service from *NTT* in order to purchase a second product or service from the organisation.
- Require a customer to purchase products or services only from *NTT DATA EMEAL* and not from a competitor.
- Request a supplier to buy from *NTT DATA EMEAL* in exchange for *NTT DATA EMEAL* buying from the supplier.
- Agree with a customer or supplier on the price or other terms on which a product or service can be resold.

- Refuse to deal with someone who wants to buy products or services from *NTT DATA EMEAL* or discontinue the relationship with someone who already buys them, without duly founded reasons.
- Refuse to buy from a supplier that deals with any of *NTT DATA EMEAL*'s competitors. Try to persuade a customer or supplier, or any other person, to do business with *NTT DATA EMEAL* and stop doing business with a competitor with whom it has a contract or a stable business relationship.

Antitrust laws also apply to imports and exports.

Any questions related to this matter, or requests for exceptions to these rules, should be directed to the Legal Departments of *NTT DATA EMEAL*.





3.10. Accuracy of statements and reports

At *NTT DATA EMEAL* we will comply with all applicable reporting requirements and regulations wherever our activities are carried out. All People of *NTT DATA EMEAL* are responsible for the accuracy of the records and reports in which we participate.

Financial reports are considered those that report on the economic situation of *NTT DATA EMEAL*, and they comprise of the data recorded during a specific period of time. In this sense, *NTT DATA EMEAL*'s financial reports must meet the highest standards and accurately reflect the true nature of the transactions they record.

The People of *NTT DATA EMEAL* cannot create or contribute to the preparation of false or misleading documents, or accounting, financial or electronic records in this regard, and no one can order or instruct them to do so.

3.11. Sustainability and environment

We carry out all our activities in a sustainable manner over time, without compromising the needs of future generations, always seeking a balance between our economic growth, social well-being and respect for the environment.

The People of *NTT DATA EMEAL* must act at all times aware of the social and environmental impacts of our projects, and adopting habits and good practices that allow them to be prevented, mitigated and/or eliminate them, contributing positively and effectively to the achievement of the sustainability objectives of *NTT DATA EMEAL* and the Entities belonging to said *Regional Unit*.

In our relationships with suppliers, contractors, and collaborators, at *NTT DATA EMEAL* we will demand compliance with our Environmental and Social Principles and requirements applicable in each case, in accordance with the Global Sustainability and ESG Policy.

3.12. Internal standards

At *NTT DATA EMEAL* we observe compliance with internal regulations, in the form of policies, procedures, guides and other documents that facilitate the achievement of strategic, operational, financial and compliance objectives in general and in particular of this Code.



4. Complaints channel (*Whistleblowing System*)

The *NTT DATA EMEAL* Reporting Channel is a tool open to all People, business partners and other third parties, to (i) help identify potential non-compliance or violations of the Code and the policies and procedures that develop it, as well as any alleged illegality, and (ii) prevent possible weaknesses or contingencies in this regard, so that the Compliance culture of is strengthened.

The Whistleblowing Channel or Whistleblowing System is strictly confidential, also considering the possibility of anonymous communications. Protects the People of *NTT DATA EMEAL*, and third parties, from any form of retaliation, if a complaint has been made, and whenever it is appropriate in accordance with the applicable regulations. This Whistleblowing Channel is managed independently by an external Law Firm of recognised prestige.

It is the obligation of all People of *NTT DATA EMEAL* to maintain a collaborative and responsible attitude in the identification of situations of actual or potential non-compliance with the Ethical Principles and standards of conduct contained in this Code, including the internal regulations of *NTT DATA EMEAL*.

In this sense, all People of *NTT DATA EMEAL* have the responsibility of reporting conduct contrary to the Code through the complaints channel implemented, at the *Regional Unit*, accessible on the Intranet for all employees, as well as on the corresponding corporate website for said employees and third parties who interact with the Group in some way.

Without prejudice to the foregoing, at *NTT DATA EMEAL* we will adopt appropriate measures, including appropriate disciplinary measures, when the corresponding internal investigation determines that the complaint is false and that it has been made in bad faith.

Internal investigations

The People of *NTT DATA EMEAL* have the obligation to cooperate fully and truthfully with all investigations carried out by *NTT DATA EMEAL*, or its corresponding Entity, regarding any potential violation of regulations or this Code. Retaliation will not be tolerated against anyone who makes a good faith report of suspected inappropriate conduct or who cooperates with an internal or law enforcement investigation, in accordance with applicable law.



5. The *NTT DATA EMEAL* Compliance Committee and the Compliance & Risk Management Department

The Compliance Committee of *NTT DATA EMEAL* is a collegiate body created in the Group's parent holding company and is made up of the following members, with global roles:



- Chief Compliance Officer.
- Head of Internal Audit.
- Head of People (HR).

The Compliance & Risk Management Department of *NTT DATA EMEAL* is governed by the principles of direct access to the governing body, independence, autonomy, authority and appropriate competence for the development of its function. Likewise, it is provided with the necessary resources to reasonably carry out its tasks and to this end, it has corporate collaboration for the proper exercise of its powers.

At the local level, the Compliance & Risk Management Department will rely on the *Head/Champion of Local Management of Compliance & Risk* who can also be contacted to resolve any doubt or query.

NTT DATA EMEAL, in its active management role, encourages each CEO of the Entities or head of the business units of *NTT DATA EMEAL* to:



Cooperate regularly with the Compliance & Risk Management Department of *NTT DATA EMEAL* and its correspondents at the country level or in the business units.



Establish Complementary Provisions that adapt or develop what is established in this Code to the particularities of your local legal environment.





6. Compliance with the *Code of Ethics and Professional Conduct*

6.1. Mandatory character

The Code is a binding document with that requires mandatory compliance for all People and Entities of *NTT DATA EMEAL*.

In the event of a violation of its guidelines, *NTT DATA EMEAL* will react immediately in accordance with the framework permitted by the applicable regulations, executing the disciplinary and legal measures that assist it, respecting in all cases the principle of proportionality.

Failure to comply with the Code or its Complementary Provisions may give rise to sanctions of a different nature, based on criteria such as the type of relationship between *NTT DATA EMEAL* and the person carrying out the breach, or the seriousness of the fact. All People of *NTT DATA EMEAL* must immediately report any breach or suspected breach of the provisions of this Code, or any allegedly illegal act, to your supervisor, the local Compliance Head/Champion or through the Whistleblowing Group or System reporting channel, as appropriate.

6.2. Engagement regarding financial and non-financial information

The financial statements of *NTT DATA EMEAL* and its Entities will comply with the regulations, generally accepted accounting principles and accounting policies of *NTT DATA EMEAL*. The same principle will apply to non-financial information statements and equivalents. Both the financial and non-financial information of *NTT DATA EMEAL* will be aligned with the provisions of the Code.

In terms of internal control for financial reporting, *NTT DATA EMEAL* and its Entities must ensure compliance with the regulations that apply to them or that of their parent company, whichever is more demanding.

6.3. Exceptions to some sections of the *Code of Ethics and Professional Conduct*

Entities of *NTT DATA EMEAL* may exceptionally deviate from any content of the Code, only to the extent that it is demonstrated that Some of its provisions are incompatible with mandatory local laws.

6.4. Questions about the *Code of Ethics and Professional Conduct*

For any questions related to this Code, we can request information or clarifications by sending an email to the Compliance & Risk Management

Department of *NTT DATA EMEAL*, to the following mailbox: EMEALcompliance@emeal.nttdata.com

Each *NTT DATA EMEAL* Entity will comply with local laws and will have the Additional Provisions it requires and may create additional local mailboxes that will be managed by the Compliance & Risk Management Department which exists at the local level.





Contact us in
info@nttdata.com