NTT DATA EMEAL Group Sustainability and ESG Policy

October 2023

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1.   Introduction

The Board of Directors of the parent holding entity NTT DATA Europe & Latam approves this Sustainability and Environmental, Social and Governance (ESG) policy as part of its commitment to sustainable development and ESG criteria, complying with stakeholders' needs and expectations. This policy also conforms to the corporate purpose of empowering people to build a better world through diverse talent and responsible technology. It outlines the purpose, strategy, scope, main objectives, action principles, commitments with our stakeholders, communication and dialogue channels, relationship with other policies and monitoring systems and supervision mechanisms linked to business-related sustainability, which ensure that our business model helps generate shared values and contributes to a more prosperous, sustainable society.

2.   Purpose

The purpose of this policy is to provide an action framework on which NTT DATA EMEAL Group can base its environmental, social, economic and governance performance, and to create long-term shared value, complying with the needs and expectations of all stakeholders and maintaining the social licence to operate.

3.   Scope

This Policy applies to and is mandatory for all NTT DATA EMEAL Group companies and extends to suppliers and stakeholders in Spain and abroad. To this end, all parties must know, understand and comply with the guidelines included in this policy, especially Members of the Board and the Executive Team, given their roles, so that it can be extended to the rest of the levels of the organisation via practice, active promotion and compliance monitoring in their area of responsibility, making it an integral part of who they are, what they say and how they behave.

4.   Our strategy

NTT DATA Europe & Latam's Sustainability and ESG strategy to help build a better world through diverse talent and responsible technology is based on three pillars:

- Environmental (E) – **Technology for the planet**: We promote using and developing tech solutions that reduce the environmental impact and make the world a better place.

- Social (S) – **Digital Education and Diversity, equity and inclusion**: We promote digital education to achieve economic growth and create a more diverse and inclusive world.

- Governance (G) – **Innovative and ethical governance**: We promote transparency, the responsible and ethical use of Artificial Intelligence or any other emerging/disruptive technology, data security and privacy, and ethics in managing information for all our stakeholders (shareholders, clients, suppliers, employees, society in general, etc.).

Furthermore, as part of our commitment to a sustainable present and future, we have made a direct strategic contribution to nine of the seventeen Nations 2030 Sustainable Development Goals through innovation in corporate and business initiatives. They include SDG 3 – Good Health and Well-being; SDG 4 – Quality Education; SDG 5 – Gender Equality; SDG 8 – Decent Work and Economic Growth; SDG 9 – Industry, Innovation and Infrastructure; SDG 10 – Reduced Inequalities; SDG 11 – Sustainable Cities and Communities; SDG 13 – Climate Action and SDG 17 – Partnerships for the Goals.

NTT DATA EMEAL's Sustainability and ESG Strategic Plan details our strategic contribution.

5.   Principles of action

The following Principles of Action were set to meet this policy's purpose and our Sustainability Plan's objectives:

- To promote achieving the United Nations 2030 Sustainable Development Agenda and the Sustainable Development Goals (SDG), especially the nine that impact our activity and the UN's Global Compact principles by adopting and disseminating the pact.

- To review and include sustainability-related opportunities and risks in the company's sustainability model, strategy and processes.

- To include Sustainability and ESG criteria in all company processes and decision-making, providing the necessary tools to stakeholders to ensure it happens.

- To publish our results annually via our economic, environmental and social performance indicators, following the main reporting standards and regulations.

Environmental

Environmental performance: To guarantee that we protect and respect the environment in all of our activities, processes, products and services (NTT DATA EMEAL's Environmental and energy policy) and that we comply with standards and regulations, obtaining environmental and energy management certificates (e.g. ISO 14001, ISO 50001, etc.).

Climate change: To promote climate action by implementing mitigation and adaptation measures and reducing greenhouse gases in our processes and value chain. To design accessible green solutions, helping our clients reduce their carbon footprint, too.

Furthermore, to promote a green, fair energy transition, considering impacts and using the technology available to do so in an orderly way at the lowest cost for society.

Responsible consumption of resources: To efficiently use the resources needed to undertake our activities, processes, products and services (energy, water, paper, chemical products, electronics, etc.).

Reducing and managing waste: To promote the circular economy by reducing, reusing and recycling waste (paper, packaging, electronics, etc.) and correctly sorting and managing waste.

Assessing and controlling suppliers in environmental matters: To set mechanisms to assess and control our suppliers' correct environmental performance.

New technologies to reduce environmental impacts: To foster innovation in new technologies, products, services and new work models (remote working, tools, etc.) to reduce environmental impacts and help our clients be more sustainable.

Environmental participation and awareness: To organise environmental awareness campaigns and courses, and to incentivise the participation and volunteering actions in projects to raise awareness about the environment.

Natural capital and biodiversity: To promote preserving biodiversity by creating natural spaces (NTT DATA EMEAL woodland) that improve the area's quality of life.

Sustainable mobility: To support the public transport pass for commuting to and from work, using electronic taxis for business travel, renting electric vehicles or including charging stations at offices.

Social

Human rights: To ensure respect for and protection of human dignity and human rights.

Job creation: To create stable, quality employment.

Talent management: To improve employees' abilities and invest in a training plan that ensures professional development, retention and employability, and also attracts new staff by collaborating with academic institutions and associations.

Responsible and inclusive R&D+i: To manage innovation and promote research and development for new products and services, which enable us to be forward-looking and include artificial intelligence and other disruptive technologies in an ethical manner, and foster partnerships with clients with the end goal of achieving a positioning that generates value for society and sets us apart from the competition.

Payment policy: To promote compliance with applicable regulations and ensure equity among employees in the same category and role or performing the same duties.

Workplace health and safety: To ensure maximum workplace safety and protect all Group employees' health.

Work-life balance, well-being and benefits: To strengthen policies that enable work-life balance, flexible working hours and disconnection, remote working, improving legal requirements for parental leave, taking care of emotional and physical health, as well as the social benefits that NTT DATA EMEAL offers its workers.

Diversity, equity and inclusion: To guarantee equal opportunities, non-discrimination and inclusion of people regardless of race, culture, sexual orientation, religion, age, gender, disability or any dimension of their diversity.

- **Gender equality**: To promote the presence of women in positions of responsibility to reduce the gender gap.
- **Disability**: To integrate collectives with different profiles/abilities and ensure that work centres are adapted, making them accessible to everyone.

Social commitment: To develop initiatives aligned with the business strategy that generate a positive impact on society and the environment (e.g. projects to promote STEM careers [science, technology, engineering and mathematics], tech-based corporate volunteering, etc.) while strategically contributing to achieving the United Nations 2030 Agenda SDGs.

Innovative, sustainable solutions: To promote innovation in designing products and services that help our clients and sustainable development with a positive environmental and social impact that is measurable at the end of projects.

Client satisfaction: To meet clients' expectations regarding quality and the execution of services rendered by the NTT DATA EMEAL Group.

Integrity with suppliers: To strengthen the relationship with suppliers, approval policies and payment conditions (paying on time and in due form). Furthermore, to promote ethical, transparent and sustainable management of all group suppliers.

Governance

Compliance: To promote compliance with current legislation in those jurisdictions in which the NTT DATA EMEAL Group is present, adopting commitments, standards, recommendations and guidelines included in international standards when there is no adequate or sufficient legal framework. To responsibly manage our day-to-day activity based on the Corporate Purpose, Mission, Vision and Values, as well as the Group's Compliance model.

Preventing corruption and bribery: To strengthen and ensure ways to implement the Global Anti-Corruption Policy and other measures in this area, together with actions to control, raise awareness, train and communicate. This extends to the Group's Code of Conduct and Ethics.

Human rights and due diligence: To go beyond compliance with the United Nations Guiding Principles on Business and Human Rights to avoid infringement situations throughout the company's supply chain, promoting business transformation aimed at an inclusive model that generates shared value.

Information transparency: To apply policies, standards or instructions adopted for transparency in communications.

Stakeholder relations: To promote two-way communication channels and be proactive in view of the different stakeholders to meet their needs and expectations (See section 'Commitment with our Stakeholders').

Risk management: To supervise and control the overall corporate risk management, minimising possible impacts (economic, social and environmental) linked to the NTT DATA EMEAL Group's activity and the effectiveness of it addressing emergencies and crises via contingency plans.

Information security and data protection: To remain committed to protecting personal data in compliance with the applicable regulations in each case and to the highest standard, such as those set out in the European Union's General Data Protection Regulation (GDPR) and information security-related technological development.

Tax and financial responsibility: To fulfil tax requirements and to strengthen policies that generate benefits conducive to the group's financial soundness and the company's long-term development, as well as comply with ESG indicators recommended by international bodies like the Sustainable Accounting Standards Board (SASB) and The Task Force on Climate-Related Financial Disclosures (TCFD).

Whistle-blowing channels: To strengthen the implementation of global whistle-blowing channels where potential breaches can be communicated confidentially and anonymously. This includes violating human rights, corruption, bribery or other illegal activity, such as workplace harassment. Said channels are available to all NTT DATA EMEAL employees and stakeholders.

Corporate image and reputation: To improve the measures that ensure a good image and reputation, through rigorous management of the company's business and activity: transparency, ethics, integrity, quality, and independence.

6. Commitment with our stakeholders

To comply with these Principles of Action, we set the following commitments with our stakeholders:

Commitment with our employees

To create stable, sustainable, quality employment in flexible working environments that foster innovation and develop products and services in diverse, dynamic environments. This promotes employee attraction, integration and retention by developing talent, regardless of race, sex or condition, or opinion, and providing equal opportunities. Particular attention is given to ensuring a work-life balance, prioritising workforce health, well-being and safety.

Commitment with our clients

To develop products and services under the maximum quality standards, which respond to our clients' sustainability needs and exceed their expectations, while guaranteeing maximum confidentiality of data in compliance with the Group's Code of Conduct and Ethics.

Commitment with our shareholders and investors

To guarantee the right to information transparency, disseminating information on the group's performance and results that is suitable, useful, reliable and true, helping ensure healthy and independent governing bodies for ethical, responsible, conscious and sustainable decision-making.

Commitment with our suppliers

To extend this policy's Principles of Action to the company's whole supply chain, paying particular attention to suppliers that maintain the highest standards in environmental, social and economic matters and guarantee the best practices available on Sustainability and Human Rights. The NTT DATA EMEAL Group will ensure fair, impartial treatment, always aiming, as far as possible, to contract local suppliers and special employment centres. The Group will also refrain from contracting suppliers that use materials that pose a conflict or employ unsustainable practices at any point of the value chain.

Commitment with regulatory bodies

To promote compliance with the laws applicable in the countries where we work and keep an open, constructive dialogue with regulatory bodies, which encourage working together on solutions that benefit society and fall within the competence of these bodies.

Commitment with the media

To ensure that relationships with the media comply with the principles of transparency, truthfulness, honesty and collaboration and that public information is always shared in a clear, transparent way.

Commitment with the environment and local communities

To develop initiatives that, with our employees' talent and technology as a driving force, enable the sustainable development of environments and communities where the NTT DATA EMEAL Group works, paying particular attention to developing environmentally friendly technologies, promoting digital education by advocating for STEM careers, and promoting diversity as a means of innovation and integrating talent for fully equal opportunities. Furthermore, NTT DATA EMEAL calls on its employees to cooperate voluntarily by making financial contributions to charitable causes and participating in the company's proposed social and environmental action activities.

7. Communication and dialogue channels

In agreement with the right to information as a fundamental and universal right, recognised in Article 19 of the Universal Declaration of Human Rights, the NTT DATA EMEAL Group is proactive in systematically listening to its stakeholders' needs and expectations through a structured process based on various communication, participation and dialogue channels and tools. Furthermore, the parent holding company, NTT DATA Europe & Latam, publishes and actively disseminates its Sustainability Report annually following leading international standards and regulations.

Main internal channels	Main external channels
- Doorways - Yammer - Communications to employees (newsletters, etc.) - Meetings and workshops - Opinion surveys - Training activities - Whistle-blowing channels or whistle-blowing systems	- Websites - Sustainability Report (Non-Financial Information Statement - Press releases - Social Media - Customer satisfaction surveys - Meetings and conferences - Bulletins and online participation platforms - Telephone numbers and contact mailboxes

8. Relationship with other policies

The parent holding company, NTT DATA Europe & Latam, has a set of standards that, besides complying with current regulations, aim to include sustainability-related best practices and international recommendations to achieve Excellence. In this sense, the rest of the internal NTT DATA Europe & Latam regulations complete this ESG and Sustainability Policy, especially the following:

- Code of Conduct and Ethics
- Global Anti-Corruption Policy
- Crime Prevention Policy
- Gifts and Hospitality Policy
- Environmental and Energy Policy
- Carbon Reduction Plan
- Environmental Good Practices Guide
- Service Quality and Management Policy
- Diversity, equity and inclusion Policy
- Equality Plan
- Generative Artificial Intelligence Usage Policy

9. Monitoring system and supervision mechanisms

The Board of Directors approved NTT DATA EMEAL's ESG and Sustainability Policy. The Board will adopt the necessary measures to implement, develop, apply, supervise, control and revise said policy. The Appointments, Remuneration and Sustainability Committee will continuously supervise the compliance of this policy's principles and action criteria, monitor the Strategic Plan and the ESG and Sustainability practices and assess the extent to which they are achieved. The ESG and Sustainability Management department defines and implements the Group's strategy and develops systems to monitor ESG and Sustainability-related results and key performance indicators (KPI), coordinating and supporting all of the company's management areas to ensure that ESG and Sustainability are implemented in all of the NTT DATA EMEAL's Group operations.

10. Approval and effective date

Following the proposal made by the Nomination and Remuneration Committee of NTT DATA Europe & Latam's Board of Directors this ESG and Sustainability Policy was approved during its session on October 2023.