



NTT DATA Australia

This Statement is submitted by NTT Australia Pty Ltd (ACN 003 371 239) on behalf of itself and the following Australian based NTT DATA group operating entities: NTT Australia Solutions Pty Ltd (ACN 081 031 432); NTT Com ICT Solutions (Australia) Pty Ltd (ACN 059 040 998); NTT Com ICT DC Solutions (Australia) Pty Ltd (ACN 100 796 405); NTT Australia Digital Pty Ltd (ACN 100 103 268); NTT Australia Database Solutions Pty Ltd (ACN 614 817 864); and NTT Australia Workforce Solutions Pty Ltd (ACN 127 870 893) ("**NTT DATA Australia**"). In this Statement "we", "us", and "our" means NTT DATA Australia.

All the entities specified above carry on business in Australia and are proprietary limited companies registered under the *Corporations Act 2001* (Cth). The registered address of NTT Australia Pty Ltd is Tower 3, Ground Floor 201 Sussex Street Sydney NSW 2000

Where the context dictates, parts of this Statement are relevant to the broader global NTT DATA, Inc. (collectively, "NTT DATA") that includes the NTT DATA Australia group, related entities and affiliate companies who form part of the Nippon Telegraph and Telephone Corporation (NTT) group of corporate companies.

NTT DATA Australia Modern Slavery Statement 2025

This Statement sets out what NTT DATA Australia has established to assess and address the risks of modern slavery that may be occurring in our global and domestic operations and supply chain.

This Statement is submitted by NTT Australia Pty Ltd (ACN 003 371 239) on behalf of itself and the Australian-based NTT DATA group operating entities for the financial year 1 April 2024 – 31 March 2025:

NTT DATA Australia 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, policies and processes and adequate controls aimed at preventing any form of modern slavery within our business and our supply chain. We are committed to improving our systems and practices to identify and combat it in our operations and supply chain. We do not use or condone the use of slave labour or human trafficking. We denounce any degrading treatment of individuals or unsafe working conditions. We support our products being free of conflict minerals.

We fully support the aims of the Australian Modern Slavery Act 2018 (Cth) and associated standards, such as the UN Guiding Principles on Business and Human Rights and are committed to tackling slavery and human trafficking wherever we can. This statement forms part of our global commitment as stated in our Global modern slavery and human trafficking statement which can be found [here](#).

We encourage any individual who has concerns about the alignment of our operations to this Modern Slavery Statement or unethical behaviour in any part of our business or operations to speak up, and to do so without fear of retaliation.



1. Modern Slavery Statement Purpose

This Modern Slavery Statement outlines the steps NTT DATA Australia has taken—and will continue to take—to identify, manage and mitigate the specific risks of modern slavery that may occur in our operations and supply chain.

This Statement is prepared in accordance with the Australian *Modern Slavery Act 2018* (Cth) and with reference to the *Modern Slavery Act 2015* (UK).

2. About NTT DATA Australia and NTT DATA, Inc.

NTT DATA Australia is part of NTT DATA, Inc.

NTT DATA, Inc. is a trusted global IT innovator of digital business and technology services. NTT DATA, Inc is part of the NTT Group, a leading, global technology services company headquartered in Tokyo, Japan, and is part of the NTT DATA Group with parent company NTT DATA Group Corporation, also headquartered in Tokyo, Japan.

With over 140,000 employees globally, NTT DATA, Inc. enables clients, as well as society, to move confidently into the digital future.

Our mission is to accelerate client success and positively impact society through responsible innovation. 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. NTT DATA Australia has a 35+ year history in the IT sector. With c.1400 employees and more than 2000 clients, we provide data centre services; consulting services; software subscription services; cloud communications; cloud infrastructure; global networks; managed services; support services and technical services.

3. NTT DATA corporate values and commitment

Our people are our most valued assets and NTT DATA 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.

NTT DATA contributes to the realisation of a safe, comfortable and abundant society by working to solve social issues and create new value for society on a global scale through Information and Communications Technology. We enable our clients and society to move confidently into the digital future by embracing sustainability, diversity, equity and inclusion.

As a corporate group that is actively growing on the global stage, we recognise that respecting human rights is an important social responsibility of organisations. The crime of modern slavery, including slavery, servitude, the worst forms of child labour, forced labour, human trafficking, debt bondage, slavery like practices, forced marriage and deceptive recruiting for labour or services, is a violation of fundamental human rights. NTT DATA has zero tolerance for modern slavery and we are committed to improving our systems and practices to identify and combat it in our operations and supply chain.

This forms part of our [Global Sustainability Charter](#) and is reflected in our Global Modern Slavery Statement and the following policies for identifying and preventing slavery and human trafficking in our operations:



- **Code of Conduct and Business Ethics:** Our code applies to all NTT DATA employees and encourages employees to do the right thing even when no one is looking. It clearly states the actions and behaviour expected of them when representing NTT DATA. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and when managing our supply chain.
- **SpeakUp & Whistleblowing Policy:** We encourage all employees, clients and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a 24/7 confidential [Whistleblowing Reporting System](#) to protect the identity of reporters.
- **NTT Group Human Rights Policy:** We are fully committed to respecting 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. The NTT Group Human Rights Policy prohibits all forms of forced and compulsory labor, human trafficking, and child labor, and highlights our commitment to correct or eradicate labor practices that violate human rights
- **NTT DATA Group Guidelines for Sustainability in Supply Chain:** We ask all our suppliers 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.

We regularly review and update our Policies to ensure they remain compliant, consistent, and effective.

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

4. Operations and Supply Chain breakdown

NTT DATA Australia has Australian based operations, with corporate offices in Melbourne, Sydney, Brisbane, Canberra and Perth. NTT DATA Australia receives some services from members of the NTT Group located offshore, including the UK, the Americas, member states of the European Union, South Africa and APAC.

Through our business relationship with suppliers all over the world, NTT DATA Australia procures high quality services and products in an effective and timely manner, and, together with our suppliers, we avoid forced labour and human trafficking in our supply chain.

NTT DATA Australia's supply chain is summarised below in the following channels.



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

To date, we have not received any complaints or allegations of human trafficking or slavery activities against any of our suppliers, through the NTT DATA Whistleblowing System or otherwise. Should NTT DATA become aware of an incident of modern slavery or human trafficking within its supply chain, we will fully investigate the incident and work with the relevant supplier to implement swift remedial actions

5. Supplier requirements

All suppliers, sub-contractors, and business partners we engage with must agree to our position on human rights and commit to not using any form of forced labor and must comply with all applicable modern slavery laws and regulations. In line with the [NTT DATA Group Corporation Procurement Policy](#), all suppliers, sub-contractors, and business partners must have adequate controls in place to ensure that they are not exposed to or complicit in human trafficking and modern slavery.

Under the [NTT DATA Group Corporation's Guidelines for Sustainability in Supply Chain](#), we require that our suppliers:

- Shall not use labor 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.

6. Governance Structure

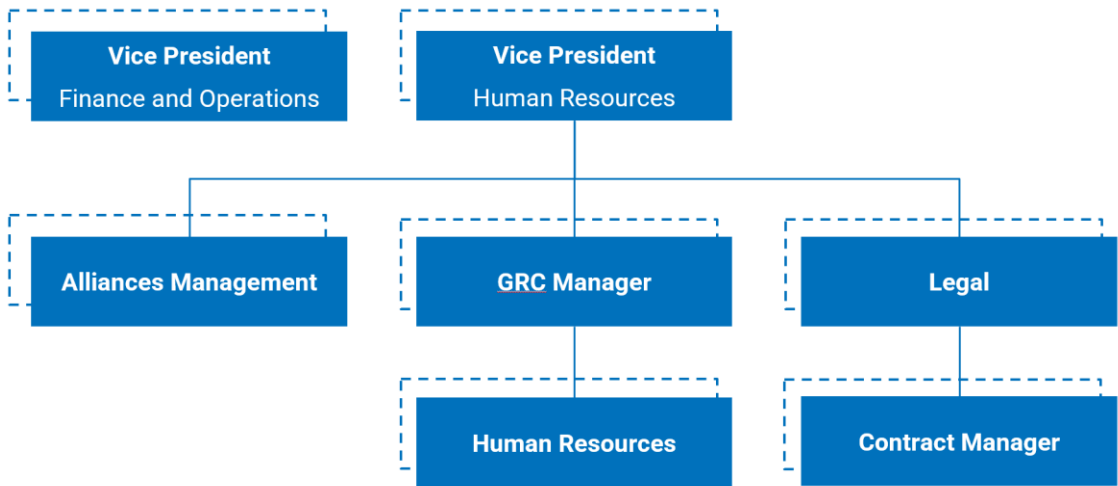
At NTT DATA Australia, oversight and governance is provided from the NTT DATA Australia Board, which approves this Statement.

Ongoing implementation and management of the activities and undertakings included in this Statement are managed by the Supply Chain Quality Assurance Committee, a combination of compliance, quality, legal, procurement, Human Resources and Executive team members.

NTT DATA Australia Board



NTT DATA Australia Supply Chain Quality Assurance Committee

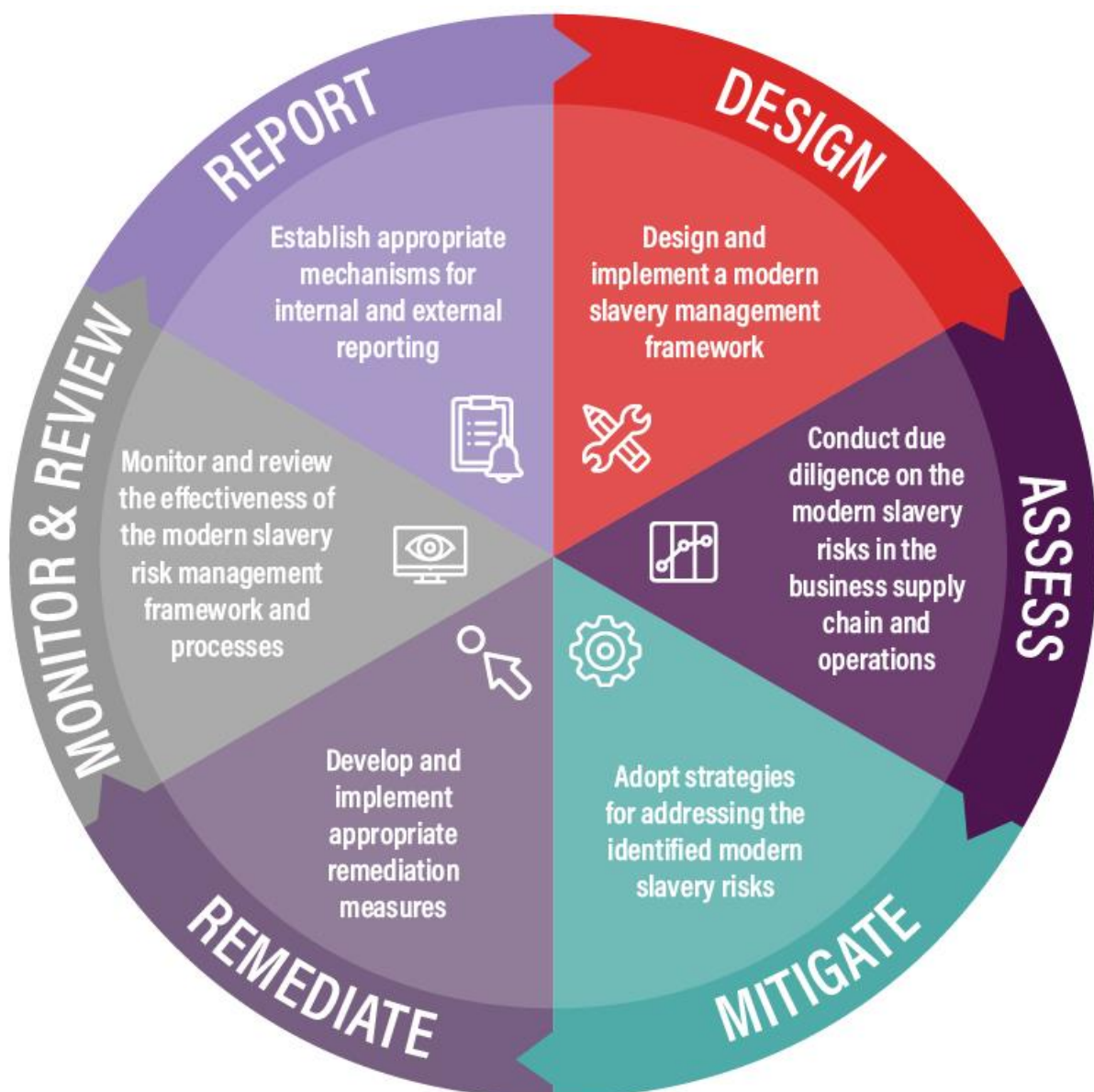


7. Consultation with entities NTT DATA Australia owns

All NTT DATA Australia companies operate under the same governance and corporate leadership structure and are subject to the same controls and processes as detailed in this statement. Each of the Boards of the NTT DATA Australia companies have reviewed, approved and signed off on this Modern Slavery Statement.

8. Supply Chain governance and assurance – Roadmap

The NTT DATA Australia Supply Chain Quality Assurance Committee follows, as part of its duties, the continuous assessment, remediation, monitoring and reporting of risk of modern slavery activity in its supply chain—as set out in the Supply Chain and Assurance Framework below. These will be reflected in the updated Modern Slavery Statements published each year.





9. Global Modern Slavery Framework

NTT DATA Australia also adopts our Global Modern Slavery Framework, which entails the following:

1. **Visibility:** having a good understanding of high-risk industries, high risk locations and supply chain complexity in our business.
2. **Policy:** Having a policy framework that addresses human rights and ethical topics in our business.
3. **Governance:** a strong governance framework to support its commitment to ethical conduct, legal compliance, and the prevention of modern slavery across its operations and supply chains. This includes regular policy reviews, internal training, and risk assessments.
4. **Remedies and solutions:** risk assessments for pro-active approach and confidential reporting channels available internally and externally to investigate any suspected concerns or violations.
5. **Transparency and accountability:** monitoring KPIs and reporting of metrics in relation to our defined key performance indicators.

10. 2024/2025 assessment, analysis, actions and assessing effectiveness

10.1. Assessment of the risk of modern slavery

In the preparation of our Modern Slavery Statement, the NTT DATA Australia Supply Chain Quality Assurance Committee has conducted formal analysis of its supply chains to identify the relative risks of modern slavery activity occurring within them. This year, the Committee has continued to focus on the supply chain of NTT Australia Pty Ltd, which is by far the largest amongst the NTT DATA Australia entities and has the majority of supply chain risk.

This year, we have re-assessed our supply chain considering current operations and prevailing market conditions including reflecting on the increased risk to modern slavery practices posed by current inflationary pressures and global social unrest.

The assessment remains the same as previous years and again identified channels that we have categorised as low risk, medium risk, and possible higher risk “hotspot” channels. In conducting this assessment, we considered sector and industry risks, product and services risks, and geographic risks, amongst other factors.

Lower risk

The areas of NTT DATA Australia’s supply chain identified as **lower risk areas** are:

- Australian-based Third-Party Professional Services;
- Employees;
- Independent Contractors; and
- Commercial Real Estate Management

Assessment and Characterisation: The individuals working in this category are known to be compensated generally above industry award rates and under standard employment terms (which must comply with the National Employment Standards), with either a high degree of autonomy over their working conditions or working for Australian-based companies with no reputational issues for questionable employee conditions. Employees are



required to comply with NTT DATA's code of conduct as well as our local and global ethical and professional standards, practices and procedures. Employees are required to complete mandatory training with a refresher each year which includes specific modules on modern slavery, ethical practices and human rights. Further, NTT DATA employees, contractors and other third parties and external stakeholders are provided with access to a SpeakUp Platform and are encouraged to report (anonymously if desired) any concerns that they may have about illegal, unethical or improper conduct which they have observed.

Medium risk

The areas of NTT DATA Australia's supply chain identified as **medium risk areas** are:

- Caterers
- Resellers and Distributors
- Outsource Service Providers – back office

Assessment and characterisation: The individuals working in the Caterer category are working in the highly regulated Australian workplace; however, do not have a high degree of autonomy in their roles, and experience a moderate risk of exploitation due to compensation not being in accordance with industry award minimum standards.

Assessment and characterisation: Reseller and Distributor workplace environments and the employee conditions are more accurately described in the low risk areas; however, the Suppliers to the Resellers and Distributors themselves (the Original Equipment Manufacturers and Software companies) may fall into the high risk category.

Assessment and characterisation: Outsource Service Providers based in India, Malaysia and Australia providing back-office support services to NTT DATA Australia. Both providers have contractually agreed to adhere to Modern Slavery requirements under the Australia legislation and both have provided their Modern Slavery Statements. These have been classified as medium risk as they are both outside of our direct control.

Higher risk

The areas of NTT DATA Australia's supply chain identified as **higher-risk areas** are:

- Vendors of Equipment or Software whose production occurred in geographies identified as at risk in the 2018 Global Slavery Index published by the Walk Free foundation; and
- Commercial Real Estate Facilities service providers (cleaners).

Assessment and characterisation: Vendors of Equipment or Software whose production occurred in geographies identified at risk in the 2018 Global Slavery Index published by the Walk Free foundation.

Assessment and characterisation: Cleaners – high risk of disadvantaged immigrant workers with low levels of autonomy and a high risk of exploitation due to compensation not being in accordance with industry award minimum standards.



Uncharacterised higher risk factors

NTT DATA Australia identified the potential impact that inflationary pressures and global social unrest may have on heightening the risk of modern slavery and other forms of exploitation within its supply chain as companies attempt to minimise costs.

NTT DATA Australia continued to follow its governance across third parties and ensured that there were no unusual deviations from our Suppliers. This year we have strengthened this process through the global third party risk management forum as detailed further below.

10.2. Actions NTT DATA Australia has taken to address those risks

As a result of NTT DATA Australia's measures, it is assured that the risk of Modern Slavery occurring within NTT DATA Australia, its group of companies, and its supply chain is minimal. Some of those actions are set out below:

10.2.1. Contractual terms and obligations

NTT DATA globally has continued to ensure that the Supplier Code of Conduct is provided to new suppliers as part of the onboarding process. Acceptance of NTT DATA's Supplier Code of Conduct is a mandatory part of the supplier onboarding process. This Code of Conduct sets out minimum standards and includes sections on Human Rights and Modern Slavery (including the requirement to flow upstream to their own suppliers) and provides audit rights for NTT DATA Australia to ensure that such standards are being adhered to.

Contract terms developed by the Committee continue to be included in NTT DATA Australia's standard terms of supply and its subcontractor agreements. The contract terms require suppliers and subcontractors to:

- implement and maintain policies and processes to identify, investigate and remedy the risk, and any instances, of modern slavery within their organisation;
- provide regular training to employees on modern slavery;
- conduct ongoing supply chain and supplier due diligence regarding the risk of modern slavery;
- notify NTT DATA Australia of any instances of modern slavery in their supply chain; and
- ensure the employment conditions in their own organisations satisfy certain requirements.

With all new contracts, NTT DATA Australia is working to implement anti-Modern Slavery provisions which give NTT DATA Australia information and audit rights and the right to require a supplier to take certain actions in response to a Modern Slavery incident. Where a supplier cannot, or does not, take such action, NTT DATA Australia also maintains termination rights to end its relationship with a non-compliant supplier.

10.2.2. Internal employment conditions review

NTT DATA Australia has again completed an internal review with its Human Resources department to confirm that all its:

1. Australian based employees are compensated at no less than the relevant Industrial Award, and in full compliance with the *Fair Work Act 2009*; and
2. Indian based employees are similarly compensated in accordance with relevant local requirements.



10.3. Assessing the effectiveness of those actions

NTT DATA Australia uses the following methods to assess the effectiveness of our actions, continue to refine our methods for assessing and mitigating risks and ensure that there are no instances of modern slavery in our supply chain:

10.3.1. Whistleblowing Policy

NTT DATA Australia has an established process that allows individuals (including third parties and other external stakeholders) to anonymously raise concerns, which includes raising concern or making a complaint regarding an actual or suspected incident of modern slavery. This was communicated and reinforced during our annual global compliance training.

10.3.2. Modern Slavery Committee Meetings

The Committee continued its meetings to review actions and steps taken to track our ability to meet the goals described above and consider continual improvement opportunities.

10.3.3. Supplier assessment checklist

NTT DATA Australia utilises a Supplier assessment checklist to identify, assess, mitigate and monitor potential risk areas of modern slavery, including human trafficking. We also utilise a One Trust tool to strengthen our compliance with the Supplier assessment checklist and streamline the process for assessing and monitoring supplier risk including modern slavery.

10.3.4. Training

NTT DATA again conducted its annual business ethics and code of conduct training which included modern slavery and will form part of our yearly global training to ensure that all parts of our global business understand the impacts of modern slavery and step-change improvements will be conducted at a global level.

10.3.5. Global Third-Party Risk Management Forum

NTT DATA Australia will continue to participate in the global NTT DATA third party risk management forum to continue to drive strong governance with respect to our third party providers and supply chains.

11. Supply Chain governance and assurance

Recap 2024 / 2025

NTT DATA Australia has not identified or received any information concerning suspected instances of Modern Slavery within its supply chains in FY24/25.

The 2024/2025 roadmap was focused on continued implementation, assessment, review, mitigation and management of the following activities:

1. A Global high-level risk assessment was conducted across all regions and business units of NTT DATA, Inc. in December 2024 to identify and assess potential human rights related risks and vulnerabilities.
2. We continued to contribute to the global focus to third party risk management and our supply chains by participating and contributing to the third-party risk management forum.



3. Delivered on the third-party risk management objectives and deliverables including new onboarding requirements through an NTT DATA Global assessment portal and approval regime.
4. Maintained our continuous assessment, remediation, monitoring and reporting of risk of modern slavery. Activities including:
 - The mapping and annual assessment of both internal personnel employment conditions and NTT DATA Australia's supply chain
 - Supplier Code of Conduct activities including:
 - Continue to provide Supplier Code of Conduct to new suppliers as part of the supplier onboarding process and track acceptance of same.
 - Confirm compliance with Supplier Code of Conduct.
 - Measure compliance training and require a mandatory NTT DATA Australia completion rate of 90%+
 - Continued the review of the published Modern Slavery statements of our Top 50 Suppliers to identify deficiencies or shortfalls against the requirements of the *Modern Slavery Act*.
 - Continued yearly business ethics and code of conduct training (including Modern Slavery).
 - Continued Committee meetings, which have proven to be a key tool in assessing NTT DATA Australia's effectiveness and providing ideas for continuous improvement.

Roadmap 2025 / 2026

The 2025/2026 roadmap is focused on our global application and our continued implementation, assessment, review, mitigation and management of the activities and undertakings as follows:

1. Continue the global focus to third party risk management and our supply chains by participating and contributing to the third-party risk management forum and contributing to the TPRM Execution Plan. Key deliverables include:
 - The development of the NTT DATA Group TPRM Policy and minimum standards.
 - Refinement of the TPRM methodology as required, with simplification of the Inherent Risk Questionnaire and Third-Party Questionnaires across all Risk Domains.
 - Issuing a TPRM Maturity Assessment to all region and business unit Chief Risk Officers as requested. by the NTT DATA, Inc. Group Risk Management Advisory Board (RMAB).
 - Quarterly TPRM Forum calls with relevant stakeholders to drive collaboration and knowledge sharing.
2. Delivering on the third party risk management objectives and deliverables including new onboarding requirements through an NTT DATA Global assessment portal and approval regime.
3. Maintain our continuous assessment, remediation, monitoring and reporting of risk of modern slavery. Activities include:
 - Continue to map and assess annually both internal personnel employment conditions and NTT DATA Australia's supply chain on an ongoing basis
 - Supplier Code of Conduct activities including:
 - Continue to provide Supplier Code of Conduct to new suppliers as part of the supplier onboarding process and track acceptance of same.
 - Confirm compliance with Supplier Code of Conduct.



- Measure compliance training and require a mandatory NTT DATA Australia completion rate of 90%+
- Continue review of the published Modern Slavery statements of our Top 50 Suppliers to identify deficiencies or shortfalls against the requirements of the *Modern Slavery Act*.
- Continue yearly business ethics and code of conduct training (including Modern Slavery).
- Continue quarterly Committee meetings, which have proven to be a key tool in assessing NTT DATA Australia's effectiveness and providing ideas for continuous improvement.

This constitutes a statement of NTT Australia Pty Ltd and has been approved by the Board of each reporting entity:

Signed by:


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David McKeering Director

NTT Australia Pty Ltd
NTT Com ICT Solutions
(Australia) Pty Ltd
NTT Com ICT DC Solutions
(Australia) Pty Ltd
NTT Australia Solutions Pty Ltd

Signed by:

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James Jones Director

NTT Australia Workforce
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NTT Australia Database
Solutions Pty Ltd

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Luke Finneran Director

NTT Australia Digital Pty Ltd