



Modern Slavery Statement

2022

NTT Australia Modern Slavery Statement 2022

This Statement sets out what NTT Australia is doing to assess and address the risks that modern slavery 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 group operating entities for the financial year 1 April 2021 – 31 March 2022.

NTT Australia 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.

At the heart of our business are relationships built on loyalty, commitment and a shared belief in what's possible when we work together: a better world for us all to live in. That's why we support all 17 Sustainable Development Goals of the United Nations.

This Statement is part of our commitment to and support of Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

NTT Australia Modern Slavery Statement 2022

This Statement is submitted by NTT Australia Pty Ltd (ACN 003 371 239) on behalf of itself and the following Australian based NTT 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 Australia**"). In this Statement "we", "us", and "our" means NTT 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 Limited (collectively, "NTT") that includes the NTT Australia group, related entities and affiliate companies who form part of the Nippon Telegraph and Telephone Corporation (NTT) group of corporate companies.

Modern Slavery Statement Purpose

This Modern Slavery Statement outlines the steps NTT Australia has taken, and will continue to take, to identify, manage and mitigate the specific risks of modern slavery 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).

About NTT Australia and NTT Ltd.

NTT Ltd. is a leading global technology services company employing 50,000 people in a diverse and dynamic workplace that spans 57 countries, trading in 73 countries and delivering services in over 200 countries and regions. We serve 11,000 clients across multiple industries, including 65.6% of the Fortune Global 500, and 79% of the Fortune Global 100 companies.

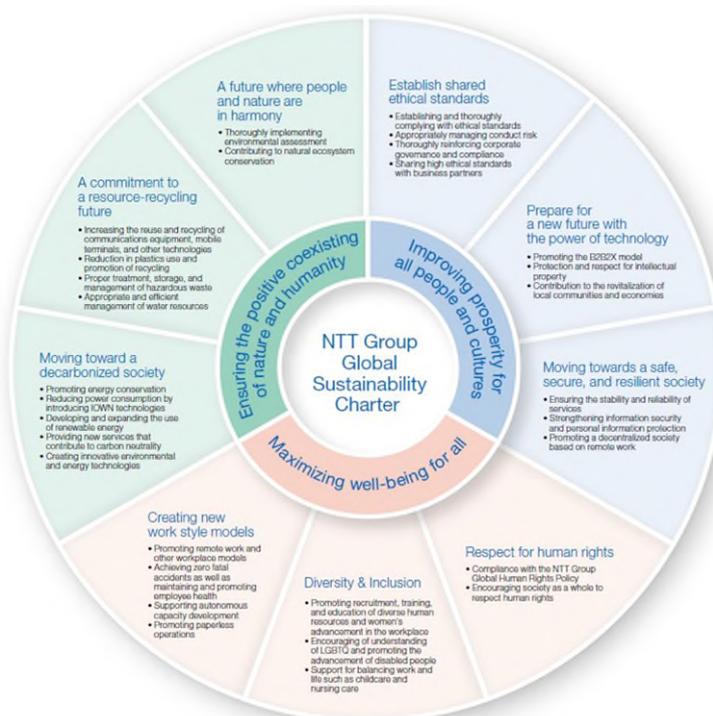
We're here to enable the connected future. Through the work we do with our clients and in our communities, we find ways that technology can make a positive impact. We call it technology for good. To help our clients achieve their digital transformation goals, we use our global capabilities, expertise, and full-stack technology services delivered through our integrated services platform. As their long-term strategic partner, we help them enhance customer and employee experience, transform their cloud strategy, modernize their networks and strengthen their cybersecurity. And across their transformation priorities, we automate their business processes and IT, drawing insights and analytics from their core business data. Together we do great things. We're proud to be part of the global holding company under NTT, called NTT Incorporated (Inc.) Akira Shimada, current President and Chief Executive Officer (CEO) for NTT, is also the CEO of NTT Inc.

NTT in ANZ has a 30+ year history in the IT sector. With c.2500 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.

NTT Corporate Values and Commitment

NTT 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 ICT.

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 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 is reflected in NTT's global modern slavery statement, in NTT's Global Supplier Code of Conduct and throughout all internal policies and training resources in every region and in our NTT Group Global Sustainability Charter as set out below.



NTT also has a **Human Rights Charter** which includes the following:

The NTT Group's Human Rights Charter

We recognize that the respect for human rights is a corporate responsibility and aim to create a safe, secure and rich social environment by fulfilling its responsibility.

1. We¹ respect internationally recognized human rights,² including the Universal Declaration of Human Rights in all company activities.
2. We responsibly respect for human rights by efforts to reduce any negative impacts on human rights holders. We respond appropriately when negative impacts on human rights occur.
3. We aim to not be complicit in infringing human rights, including being involved in discrimination, directly or indirectly.
4. When negative impacts on human rights are done by a business partner and are

linked to a product or service of the NTT Group, we will expect them to respect human rights and not to infringe on them.

Notes: 1. "We" means the NTT Group and its officers and employees.
2. "Internationally recognized human rights" are rights included in declarations and rules that form the basis for international standards of universal human rights throughout the world and specifically refer to the following.
United Nations (the Universal Declaration of Human Rights and the two Covenants on human rights)

- The Universal Declaration of Human Rights (adopted by the United Nations General Assembly in 1948)
- International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights (adopted by the United Nations General Assembly in 1966, in force from 1976)

International Labour Organization (eight basic principles of the Core Conventions of the ILO Declaration)

- The eight core principles of the ILO Declaration on Fundamental Principles and Rights at Work (adopted at the 86th International Labour Conference in 1998) are: Forced Labour, Freedom of Association and Protection of the Right to Organize, Right to Organize and Collective Bargaining, Equal Remuneration, Abolition of Forced Labour, Discrimination (Employment and Occupation), Minimum Age Convention, and Elimination of the Worst Forms of Child Labour.

Notes: In carrying out articles 2 through 4 above, we apply UN Guiding Principles on Business and Human Rights and ISO 26000 and are subject to the procedures described therein

Operations and Supply Chain breakdown

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

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

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

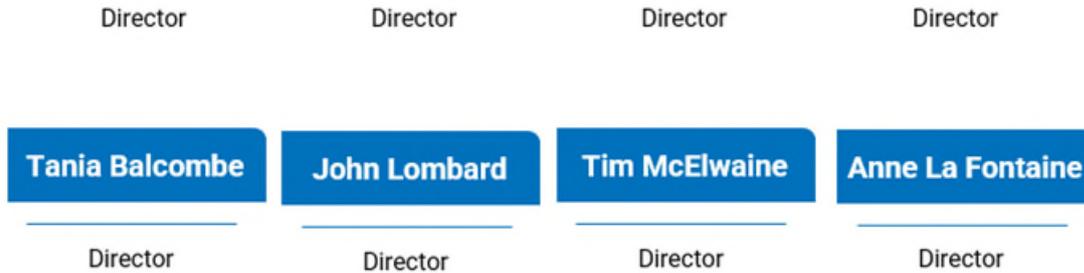


Governance Structure

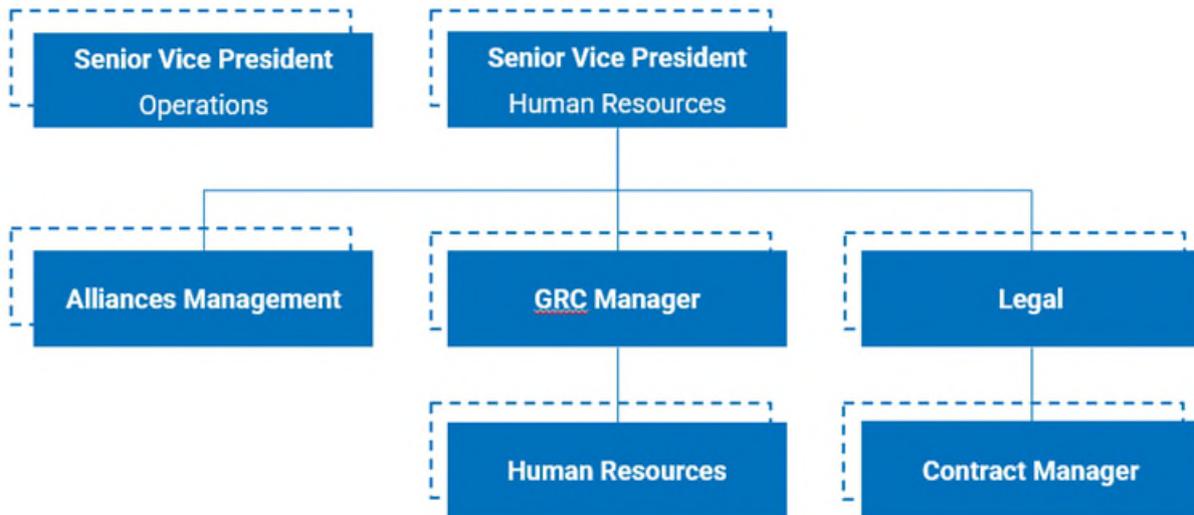
At NTT Australia, oversight and governance is provided from the NTT Australia Board, which approves this Statement.

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 Australia Board



NTT Australia Supply Chain Quality Assurance Committee

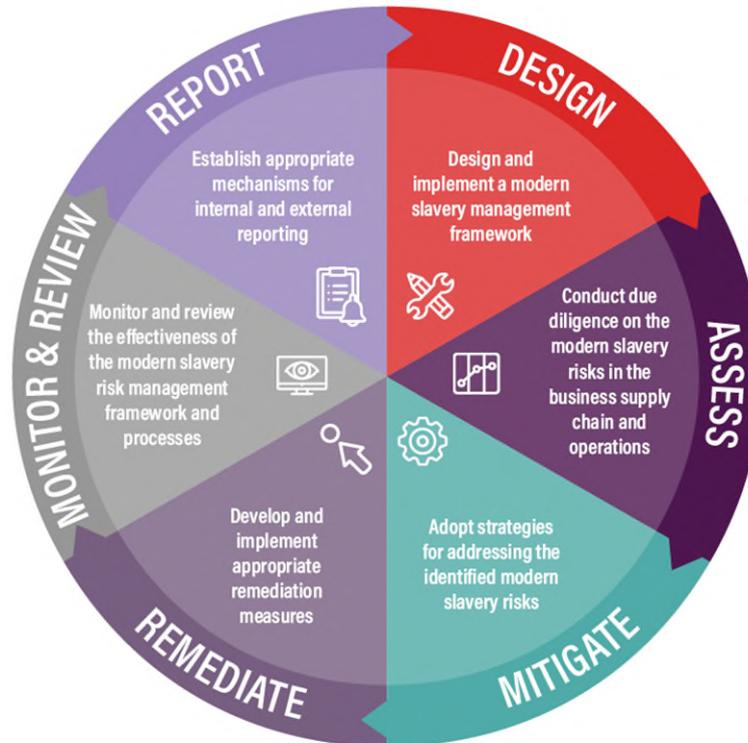


Consultation with entities NTT Australia owns

All NTT 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 Australia companies have reviewed, approved and signed off on this Modern Slavery Statement.

Supply Chain governance and assurance – Roadmap

The NTT Australia Supply Chain Quality Assurance Committee follow, 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.



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2021/2022 Due Diligence, Analysis and actions

Assessment of the risk of modern slavery

In preparation of our Modern Slavery Statement, the NTT 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 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 inflationary pressures and Covid-19.

The assessment 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.

¹ Source: <https://www.nortonrosefulbright.com/en/knowledge/publications/06a565ee/modern-slavery-act-what-businesses-in-australia-need-to-know>

Lower risk

The areas of NTT 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, 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'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 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 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. 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 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 identified the potential impact that the COVID-19 pandemic and inflationary pressures 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 continued to follow its governance across third parties and ensured that during the pandemic, there were no unusual deviations from our Suppliers. We contacted our Supply chain where applicable to confirm their pandemic policy and their commitment to their employee's health and wellbeing.

Review of top 50 Suppliers – Modern Slavery Statement

As reported in last year's Modern Slavery Statement, the Committee contacted NTT Australia's top 50 Suppliers in annual spend and requested that the Suppliers outline their approach to addressing the risks of modern slavery and to provide their Modern Slavery Statement. Those Suppliers' responses were recorded and retained in the procurement team records, as well as each Supplier's individual Modern Slavery Statement.

NTT globally have introduced a Supplier Code of Conduct which will be provided to new suppliers as part of the onboarding process. Acceptance of NTT's Supplier Code of Conduct is a mandatory part of the 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 to ensure that such standards are being adhered to. NTT Australia will also work towards providing the Supplier Code of Conduct to its top 50 Suppliers. This is further discussed below.

Contractual terms and obligations

Contract terms developed by the Committee have been added to NTT Australia's standard terms of supply and its subcontractor agreements as represented in last years Statement. 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 of any instances of modern slavery in their supply chain; and
- ensure the employment conditions in their own organisations satisfy certain requirements.

These terms will be updated this financial year to reference and require adherence to the NTT Supplier Code of Conduct.

Internal Employment Conditions Review

NTT Australia has again completed an internal review with its Human Resources department to confirm that all its Australian and Indian based employees are compensated at no less than the relevant Industrial Award, and in full compliance with the *Fair Work Act 2009*.

Whistleblowing Policy

NTT 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.

Remediation Process

NTT Australia is committed to a zero tolerance approach to modern slavery. As stated in last year's Statement, NTT has established a process to manage suppliers that fail to meet the required standards and/or agree to certain contractual obligations. In the event an actual or suspected instance of modern slavery is identified, NTT Australia will promptly seek an explanation from the relevant supplier and require that supplier to implement an approved remediation plan. In the event a supplier fails to implement the remediation plan, or the remediation plan fails to address the issue, NTT will review its relationship with the supplier with a view to terminating the contract(s) and sourcing from alternative Supplier's.

How NTT Australia will assess the effectiveness of these actions

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

NTT Australia implemented a Supplier assessment checklist to identify, assess, mitigate and monitor potential risk areas of modern slavery, including human trafficking. We have implemented 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.

NTT 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.

NTT introduced a global Supplier Code of Conduct policy to influence Suppliers and to drive change and place a level of control across our supply chains.

Supply Chain governance and assurance – Recap 2021/2022

The 2021/2022 roadmap was focused on continued implementation, assessment, review, mitigation and management of the following activities:

1. We continued to map and assess annually both internal personnel employment conditions and NTT Australia's supply chain on an ongoing basis. Particular focus was placed on our Hyderabad, India team, outsourced service providers operating offshore and the impact of Covid-19 and inflationary pressures.
2. For the currently identified Higher Risk Suppliers we:
 - a. have engaged with Building and Facilities managers to assess and confirm in writing that all employees, subcontractors, and subcontractors involved with services on the premises are legally able to work in Australia, and are paid no

- less than an Industrial Award and in full compliance with the Fair Work Act 2009.
- b. received confirmation that all employees, subcontractors, and sub-subcontractors involved with services on the premises are legally able to work in Australia, and are paid no less than an Industrial Award and in full compliance with the *Fair Work Act 2009*; and
 - c. We commenced our 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*. In general, they are taking the appropriate steps to help stem the presence of modern slavery within their supply chains. NTT anticipates that its Supplier Code of Conduct will help influence positive change to increase reflection on their own supply chains and maintain positive compliance.
3. Developed a strategy to manage and influence suppliers who fail to meet the required standards and/or agree to certain contractual obligations and source alternative suppliers where remediation is unsuccessful.
 4. Expanded SpeakUp (whistleblowing) to permit third parties and external stakeholders to provide feedback and raise concerns and encouraged employees and contractors to 'SpeakUp' in the annual mandatory training.
 5. Commenced quarterly Committee meetings which have proven to be a key tool in assessing NTT's effectiveness and providing ideas for continuous improvement.
 6. Continued yearly business ethics and code of conduct training (including Modern Slavery).
 7. Implemented OneTrust system to strengthen our compliance with the Supplier assessment checklist and streamline the process for assessing and monitoring supplier risk including modern slavery.

Roadmap 2022/ 2023

The 2022/2023 roadmap is focused on continued implementation, assessment, review, mitigation and management of the activities and undertakings as follows:

- Continue to map and assess annually both internal personnel employment conditions and NTT Australia's supply chain on an ongoing basis
- Implement supplier assessment process in OneTrust
- Supplier Code of Conduct activities – including:
 - o Updating contract terms to require adherence to Supplier Code of Conduct.
 - o Provide Supplier Code of Conduct to new suppliers as part of the onboarding process and track acceptance of same.
 - o Commence activity to provide and require acceptance of the Supplier Code of Conduct to its top 50 Suppliers.
- Measure compliance training and require a mandatory NTT 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'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:

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<p>Tania Balcombe Director</p>	<p>Tarquin Bellinger Director</p>	<p>Tim McElwaine Director</p>	<p>Mark Miller Director</p>	<p>Mike Miers Director</p>
<p>NTT Australia Pty Ltd</p>	<p>NTT Com ICT Solutions (Australia) Pty Ltd</p>	<p>NTT Australia Workforce Solutions Pty Ltd</p>	<p>NTT Australia Database Solutions Pty Ltd</p>	<p>NTT Australia Digital Pty Ltd</p>
	<p>NTT Com ICT DC Solutions (Australia) Pty Ltd</p>			
	<p>NTT Australia Solutions Pty Ltd</p>			

Together we do great things