



Modern Slavery Statement

2020

NTT Australia Modern Slavery Statement 2020

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 2019 – 31 March 2020.

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 2020

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); Oakton Contracting & Recruitment Pty Ltd (ACN 077571843); 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 more than 40,000 people in a diverse and dynamic workplace that spans 57 countries, trading in 73 countries and delivering services in over 200 countries and regions.

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. We help organisations achieve business outcomes through intelligent technology solutions. For us, intelligent means data driven, connected, digital and secure. By harnessing the collective effort of our people, together with external innovators and innovations, we drive excellence through the technologies we integrate and the services we deliver.

NTT Australia has a 30+ year history in the Australian IT sector. With over 2500 employees and 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.

NTT 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 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

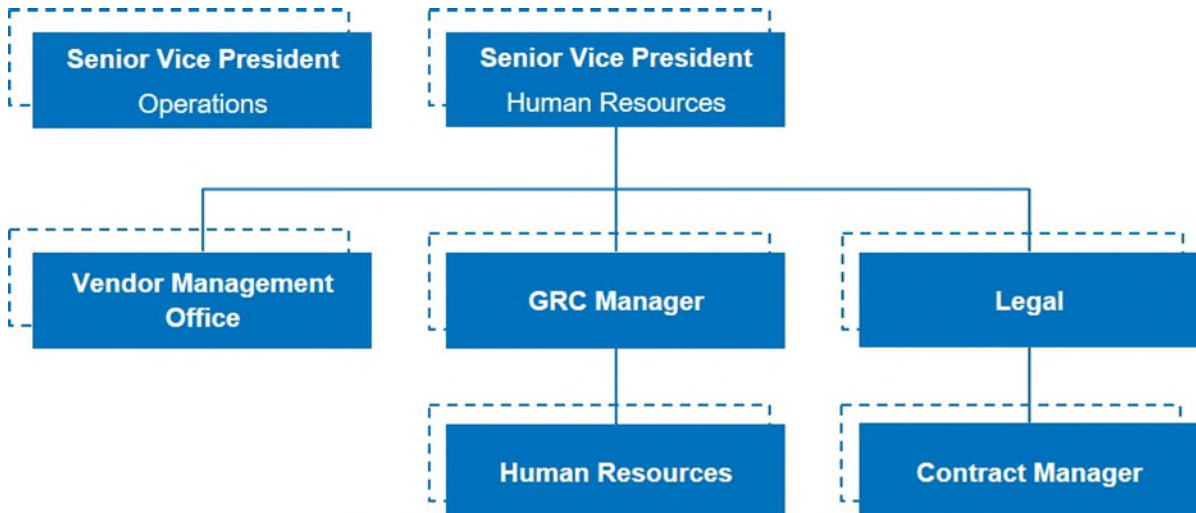
At NTT Australia, oversight and governance is provided from the NTT Australia Board, which approves this Statement.

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

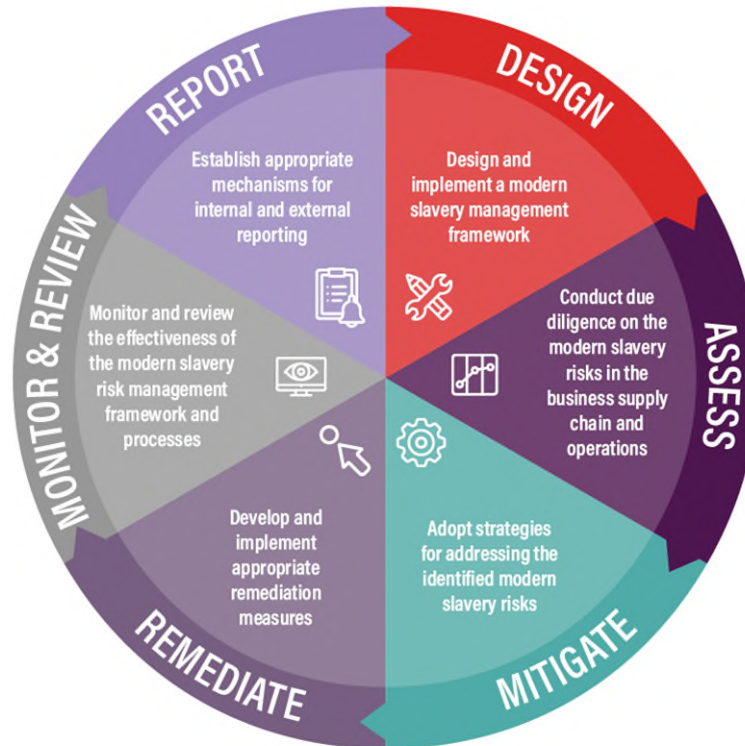


NTT Australia Supply Chain Quality Assurance Committee



Supply Chain governance and assurance – Roadmap

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



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2020 Due Diligence, Analysis and actions

Assessment of the risk of modern slavery

In preparation of this 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 focused on the supply chain on NTT Australia Pty Ltd, which is by far the largest amongst the NTT Australia entities.

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

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

- Australian-based Third-Party Professional Services;
- Employees;
- Independent Contractors; and

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

- 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.

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

- Caterers
- Resellers and Distributors

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.

The areas of NTT Australia's supply chain identified as **high-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.

Review of top 50 Suppliers – 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.

Suppliers' responses have been recorded and retained in the procurement team records, as well as each Supplier's individual Modern Slavery Statement. Whilst there are some deficiencies in information provided, which we will seek to address, no known risks of modern slavery have materialised.

Contractual terms and obligations

The Committee has developed contract terms for inclusion into NTT Australia's standard terms of supply and its subcontractor agreements. This requires 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.

Internal Employment Conditions Review

NTT Australia has completed an internal review with its Human Resources department to confirm that all its Australian 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 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, and is working to establish 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.

Supply Chain governance and assurance – Roadmap


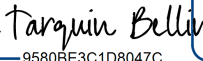

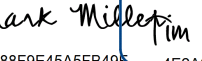


2021

The 2021 roadmap of ongoing implementation and management of the activities and undertakings included in this Statement under the management of the Supply Chain Quality Assurance Committee is as follows;

1. Continue to update standard terms to include obligations regarding modern slavery with which all suppliers and subcontractors must comply, that will apply to all new contracts;
2. Request suppliers and subcontractors with existing contracts to confirm compliance with the protocols to combat modern slavery;
3. Include acceptance of modern slavery protocols as a mandatory requirement to be met by respondents in all requests for tender
4. Confirm with NTT's Human Resources department that all of NTT Australia's personnel employed in foreign jurisdictions are compensated at no less than that required under the relevant local law.
5. Map and assess NTT Australia's supply chain on an ongoing basis;
6. For the currently identified High Risk Suppliers;
 - a. For Australian-based cleaners, request that Building and Facilities managers assess and confirm in writing 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
- b. Analyse published Modern Slavery statements of suppliers and identify deficiencies or shortfalls against the requirements of the *Modern Slavery Act*.
7. Develop a strategy to terminate and source alternate supply where a High Risk Supplier does not comply with item 2 above;
 8. Establish reporting mechanisms for internal and external reporting; and
 9. Assess effectiveness of NTT Australia's Modern Slavery Act compliance on 1 April 2021, compared to 1 April 2020, with evidence. This assessment will be included in the 2021 Modern Slavery Statement.

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>Craig Goldberg Director</p>	<p>Mark Miller Director</p>	<p>Tim McElwaine 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 Digital Pty Ltd</p>	<p>NTT Database Solutions Pty Ltd</p>	<p>NTT Workforce Solutions Pty Ltd</p>	<p>Oakton Contracting & Recruitment Pty Ltd</p>

Together we do great things