

ANTI-CORRUPTION POLICY OF NTT SYSTEM S.A.

The fundamental document regulating the area of counteracting corruption in NTT System S.A. is the Anti-Corruption Policy. The Policy defines uniform principles and standards of conduct that allow to identify and prevent corrupt activities.

Implementation of and compliance with the Anti-Corruption Policy is to be ensured by the execution of the Anti-Corruption Program of NTT System S.A.

The Anti-Corruption Policy in force is aimed at preventing corruption in its broadest sense. The procedural and organizational solutions contained therein enable the identification of corruption events, define the manner of proceeding in the event of a corruption situation as well as the rules for conducting internal proceedings related to information on suspected corruption events.

The solutions defined in the Anti-Corruption Policy apply to all employees, regardless of the nature of their work and position.

The purpose of the Anti-Corruption Policy is to prevent corruption events by :

- identifying and outlining the illegal nature of corrupt practices;
- defining actions which may lead to corrupt practices or be interpreted as such practices;
- promoting among the Company's internal and external stakeholders attitudes which are based on the conviction that honest conduct promotes competitiveness and is an expression of social responsibility;
- publication and distribution of the Company's Anti-Corruption Policy to the Company's stakeholders; NTT System S.A. confirms its commitment to improving its performance and service in this regard, ensuring the implementation of a business model and work environment based on mutual trust;
- not offering nor accepting any undue financial or personal benefits;
- performing their duties in a manner that ensures transparency and impartiality of actions towards all stakeholders;
- reporting any activity that might violate the hereby Policy to the supervisor;
- conducting marketing activities in accordance with the rules of law and the Company's internal regulations.

Risk areas for corrupt activities include:

- procurement proceedings;
- cooperation with external parties;
- execution of investment processes;
- transactions with related entities;
- expenses related to business travel;
- representation and advertising expenses, including invitations and gifts;
- expenditures on marketing services;
- cash transactions;
- donations and sponsorship agreements.

The following means of implementing the Anti-Corruption Policy have been identified:

Due diligence shall be exercised to ensure that dealings with external parties are open and transparent so as to preclude the possibility of corrupt and abusive activities.

Employees and external parties are encouraged to provide information regarding violations of the Policy, as well as other improper behaviour.

It is ensured that employees are made aware of the ability to identify corrupt activities and other malpractices through spreading awareness, training, enabling proper understanding of the Policy and utilization of its principles by employees in their daily work.

The hereby Policy shall be known, understood and made available to all employees and stakeholders of the Company.

Board Chairman

10 January 2022