

I. Purpose of the procedure

1. The purpose of the procedure is to determine the principles of anonymous reporting by the employees of NTT SYSTEM S.A. (hereinafter referred to as: the Company) as well as external parties (Stakeholders) of violations of law, binding procedures, corruption, ethical standards and social responsibility standards. Furthermore, the purpose of the procedure is to assure protection of the Notifying Person against retaliation, discrimination and any other kind of unfair treatment in connection with the report made, using secure communication channels to ensure the protection of the Notifying Person.
2. The procedure is an internal procedure of the SA 8000 Social Responsibility System and the Anti-Corruption Program.

II. Report submission rules

1. Employees may submit reports at their discretion to:
 - a) their immediate supervisor
 - b) Representatives of the Social Responsibility Team selected to carry out activities related to the reports (the composition of the Social Responsibility Team is set out in Annex 3 to the Procedure)
 2. External parties (Stakeholders) may submit notices to the Representatives of the Social Responsibility Team.
 3. Reports can be submitted anonymously.
 4. The identity and data of the person submitting the report and the person indicated in the report are subject to legal protection in accordance with the provisions on the protection of personal data. The Company undertakes to exercise due diligence to preserve the confidentiality of the data provided, subject to the fact that in the event of proceedings conducted by authorized bodies in connection with the report, information on the identity of the above persons may be provided to the aforementioned authorized bodies.
 5. Means of submitting reports of violations:
 - a. orally
 - b. in writing
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- c. using the electronic form on the Company's website www.ntt.pl directly to the Representatives of the Social Responsibility Team;
- d. by email to naruszeniaccsr@ntt.pl or to the email address of your immediate supervisor;
- e. by mail to the Company's address with a note „Do not open. To be delivered personally to the addressee – CSR”, on the reports addressed to the immediate supervisor additionally put down the data of the addressee;
- f. to the CSR report submission box located at the Company's headquarters. As for reports addressed to the immediate supervisor, additionally include the addressee's data
- g. in any other manner deemed appropriate by the Notifying Person.

III. Measures of protection of the Notifying Person from retaliation, discrimination and other forms of unfair treatment

1. Subject to Section 2, the Company shall protect the Notifying Person from retaliation, discrimination and other forms of unfair treatment of the Notifying Person. The Company shall take appropriate action, set forth in Section 3, with respect to any person who fails to comply with the prohibition against retaliation, discrimination, or other adverse action against a Notifying Employee.
 2. The Company does not provide any protection to the Notifying Persons who have made a report in bad faith, in particular through intentional slander or false statements.
 3. The prohibition against retaliation, discrimination, or other forms of unfair treatment of the Notifying Person specifically covers the following instances caused by an employee filing a report:
 - a. suspension, involuntary and unpaid leave of absence, dismissal or equivalent measures;
 - b. demotion or withholding of promotion;
 - c. transfer of duties, change of workplace, reduction in remuneration, change of working hours;
 - d. withholding of training;
 - e. negative performance evaluation or negative job evaluation;
 - f. imposition or application of any disciplinary measure, reprimand or other penalty, including a financial penalty;
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- g. coercion, intimidation, harassment or exclusion;
 - h. discrimination, unfavourable or inequitable treatment;
 - i. failure to convert a fixed-term contract of employment into a permanent employment contract when the employee could reasonably have expected to be offered permanent employment;
 - j. non-renewal or early termination of a fixed-term employment contract;
 - k. referral for a psychiatric or medical examination.

IV. Processing of reports

1. The supervisor who received the report immediately notifies the representatives of the Social Responsibility Team about the said report.
 2. Representatives of the Social Responsibility Team shall prepare a report card in accordance with the template *CSR Complaint and Violation Report Card* – Form 1 to the hereby Procedure and record the aforementioned report card in the Register of CSR Complaints and Violations.
 3. In the event of a conflict of interest, Team Representatives with a conflict of interest are excluded from the work, which is recorded on the CSR Complaint and Violation Report Card, along with the reason for the exclusion.
 4. The supervisor receiving the report, in consultation with the Representatives of the Social Responsibility Team or the Representatives of the Social Responsibility Team themselves, shall, within 7 days of receiving the report, verify the validity of the report or complaint.
 5. If the validity of a violation report or complaint is negatively verified and the suspicions contained therein are dismissed, the case shall not be pursued further, which shall be noted on the Complaint and Violation Report Card with the reasons therefor.
 6. In the event of a suspicion that an Employee committing the violation has committed a criminal offence, the Social Responsibility Team, in consultation with the Company's Management Board, shall take steps to fulfil its obligation to notify the relevant state authorities.
 7. If the validity of the report or complaint is positively verified, the supervisor receiving the report in consultation with the Representatives of the Social Responsibility Team or the Representatives of the Social Responsibility Team themselves:
 - a) determine the reasons for non-compliance,
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- b) assess the effects and impact of the situation described in the report on:
 - i) ethical principles,
 - ii) social responsibility,
 - iii) possible violation of the law,
 - iv) the impact of the situation on the Company,
 - v) the impact of the described situation on the Company's personnel,
 - c) assess the need for action ensuring that the situation described does not occur again,
 - d) determine and implement the necessary corrective and remedial actions and appoint Employees responsible for their execution,
 - e) check the effectiveness of the actions taken,
 - f) if the problem goes beyond their competence, experts (internal or external) are appointed to work on the issue,
 - g) inform the Notifying Person (if they provided their data), the Employee Representative and the interested parties (Stakeholders) about the findings, the corrective action programme and the results of the actions taken.
8. All findings, corrective actions, and results are recorded on the CSR complaint and violation report card.
9. All actions are planned and taken in such a way as to:
- a) maintain their confidentiality in the required area (e.g., to protect the data of the Notifying Person)
 - b) prevent the retaliation against the Notifying Person, even if the chance of retaliation is minimal.

V. Evaluation of corrective actions taken

1. The supervisor in the scope of reports handled by him, together with Team Representatives, once every six months analyses the reports and corrective actions taken in order to assess their effectiveness. The result of the assessment shall be recorded in the form of a staff memo, which shall be attached to the collection of CSR complaint report cards.
 2. If it is determined that the corrective actions taken were not sufficient, the report reviewers initiate further corrective actions.
 3. Further corrective actions taken shall be communicated to the Notifying Person (if possible).
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**PROCEDURE FOR ANONYMOUS
REPORTING
OF COMPLAINTS AND CSR
VIOLATIONS AT NTT SYSTEM S.A.**

Issue nr 2

Valid from: 10-01-2022

VI. Attachments:

1. CSR complaint and violation report card at NTT System S.A.
2. Register of reported violations in NTT System S.A. Company.
3. Composition of the Representatives of the Social Responsibility Team