

ANTI-CORRUPTION POLICY OF NTT SYSTEM S.A.

The top management of NTT System S.A., together with the entire executive cadre and all employees, participates in promoting the values of honesty, transparency, openness and adherence to ethical and moral principles.

The Company's transparent, reliable and ethical actions, which stay in compliance with the anti-corruption management system, contribute to the positive image of the company as a credible, responsible and stable business partner as well as an employer.

The Company adheres to the principle of „zero tolerance for corruption” while complying with applicable legal regulations, obligations relating to anti-corruption as set forth in relevant documents, i.e. Anti-Corruption Program, Code of Business Conduct, Code of Conduct for Suppliers, and internal regulations of organizational as well as financial nature implemented in the Company. All Company employees are required to comply with the law as well as internal rules and regulations.

The Company's goal in managing anti-corruption activities is to prevent the occurrence of corruption related incidents and to eliminate factors that may increase the risk of the occurrence of corruption in connection with the Company's business activities.

The top management of NTT System S.A. is committed to participating in and supporting activities related to the maintenance, continuous improvement, monitoring and evaluation of the anti-corruption activities management system, and provides adequate resources and assets to achieve the system's objectives and maintain its effective operation.

All employees regardless of the type of work performer and position occupied, co-workers, business partners, suppliers and clients of NTT System S.A. are obligated to comply with the hereby Policy and, in particular, to act with integrity in accordance with the following principles:

- The Company strictly prohibits participation in any corrupt behavior of offering, promising, giving, accepting, requesting or seeking undue financial or non-financial benefits in connection with the performance of official duties, whether in the public or private sector;
- The Company prohibits any retaliatory, discriminatory or disciplinary action against individuals who have refused to accept or give undue financial benefits, including in instances that may result in the loss of business opportunities for the Company;
- The Company prohibits taking any retaliatory, discriminatory or disciplinary actions against individuals who submit a report regarding a corrupt or potentially corrupt incident based on good faith even if it would later be found to be false;
- Any individual involved in an incident of a corrupt nature, witnessing such an incident or having information about such an incident is required to report it immediately.

The Company ensures that each corruption report will be fairly and objectively verified and investigated, and that individuals or entities reporting actual or suspected corruption incidents will be provided with anonymity, confidential channels of communication and protection from retaliation.

Top management is committed to establishing a completely independent and impartial team with the appropriate authority to ensure anti-corruption compliance at the Company.

In the event of violations of the hereby Policy as well as other anti-corruption regulations, an investigation shall be carried out and disciplinary action shall be taken, and in the situation of violation of the law, a report shall be made to the relevant government authorities.

The hereby Policy has been communicated and is understood and available to all employees, associates, contractors and stakeholders in the Company's business.

March 14, 2023.

President of the Management Board