

RESPONSIBLE MINERALS SOURCING POLICY IN THE COMPANY NTT SYSTEM S.A. ("Policy")

NTT System S.A. ("Company") is a Polish company engaged in the design, production, and sale of computer hardware. The company provides modern technological solutions to both individual and business customers. In its operations, it utilizes innovative technologies and high-quality components, which are used in the production of its computer hardware.

The company's core values are ethical conduct and respect for human rights. To this end, it is committed to responsible sourcing of components that do not use minerals from conflict-affected or high-risk regions.

NTT System S.A. uses components purchased from manufacturers and suppliers in its computer production process. The company's supply chain is complex, and many components, which may contain minerals from conflict-affected or high-risk regions, undergo numerous stages of trade and are the subject of transactions between multiple entities before being delivered to the company.

The company does not directly use minerals in the production process of its products, nor does it purchase them from smelters. The company only purchases finished components from suppliers, and therefore relies on declarations submitted by contractors to identify the source of the minerals contained in these components.

We purchase only from distributors and manufacturers in an ethical and sustainable manner, while ensuring respect for human rights throughout our supply chain. When ordering components, the Company exercises the utmost care to eliminate the risk of purchasing components containing 3TG conflict minerals (tin, tantalum, tungsten, gold) and cobalt, the acquisition of which may finance or support the activities of armed or criminal groups.

In accordance with its Responsible Minerals Sourcing Policy, the Company is actively involved in supporting compliance with applicable laws regarding conflict minerals. The Company is an active participant in the Responsible Minerals Initiative (RMI) and exercises due diligence in selecting sourcing sources and overseeing the supply chain.

By leveraging the support mechanisms available under the Responsible Minerals Initiative (RMI) for smelters and refiners, the Company is contributing to increased participation in responsible mineral sourcing programs, which translates into improved supply chain security and transparency.

If the above actions prove ineffective, the Company will consider changing component suppliers to entities that meet the requirements for responsible mineral sourcing throughout the entire supply chain.

The Company verifies the sources of conflict minerals and exercises due diligence when selecting components used in TCO-certified and EPEAT-registered products, based on data received from suppliers in the form of conflict minerals reporting templates on CMRT and/or EMRT forms. Based on this information, the Company identifies the smelters and refineries from which minerals used in the production of components used in the certified computers manufactured by the Company originate.

NTT System S.A. requires its suppliers to source raw materials only from smelters and refineries certified for responsible mineral sourcing.

In the absence of such certificates, suppliers are obliged to take steps to encourage smelters and refineries to participate in programs enabling them to obtain appropriate certification.

The Company aims to ensure that the 3TG and cobalt minerals contained in its products do not finance or benefit armed groups in the Democratic Republic of the Congo or neighboring countries. The Company's policy is consistent with the OECD Due Diligence Guidance for Responsible Supply Chains. The Company makes every effort to purchase components only from manufacturers and suppliers who maintain due diligence standards in their production processes.

The NTT System S.A. policy is regularly reviewed and its current version is published to ensure its continued relevance and adequacy in the context of the Company's business activities.

This Policy is provided to suppliers for their use.

The responsible minerals sourcing policy has been approved by the Company's Management Board.

Obligations towards the Company's suppliers:

1. Establish and maintain a publicly available policy on responsible mineral sourcing consistent with OECD guidelines.
2. Providing information confirming that tantalum, tin, tungsten, gold and cobalt are responsibly sourced.
3. Not directly or indirectly financing armed and criminal groups in conflict-affected regions.
4. Suppliers shall not tolerate or contribute to human rights abuses, including forced and child labor, or environmental degradation.
5. Adherence to a responsible mineral sourcing policy.
6. Supporting responsible sourcing of raw materials from regions where certain mining operations may fund armed groups or violate human rights.
7. Striving to encourage smelters and refineries to participate in programs enabling them to obtain appropriate certification.

March 31, 2026

On behalf of the Management Board
NTT System S.A.:

VICE PREZES



Grzegorz Kurek

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