

**CODE OF CONDUCT
FOR SUPPLIERS OF
NTT System S.A.**

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1. Scope and area of application

The cornerstone of NTT System S.A.'s operations is to conduct business in a responsible manner, in accordance with the principles of sustainable development and social responsibility.

The Company demands from its partners a high standard of operation in compliance with applicable regulations, norms and international conventions.

The Company places particular importance on:

- adherence to basic principles in the area of human rights,
- labor standards,
- corruption prevention,
- environmental protection.

The Code of Conduct for Suppliers of NTT System S.A. applies to all Suppliers and subcontractors (hereinafter collectively referred to as "Supplier"). In the course of cooperation, all entities cooperating with NTT System S.A. shall adhere to the principles of ethical conduct set forth in the hereby Code. Such aforementioned entities are obligated to observe the Code with due diligence and familiarize all their employees, staff and associates with its contents.

2. Compliance with the Code of Conduct for Suppliers

NTT System S.A. conducts a risk-based analysis of the Supplier's business, both before the start of the cooperation as well as throughout its duration. Suppliers are required to comply with the procedures present in NTT Systems S.A.

In the event of becoming aware of any legal action, investigation, law enforcement, governmental or administrative proceedings related to violation of laws of trade, anti-trust, bribery, fraud; any corruption or any other misconduct or violation of business regulations, Suppliers agree to notify NTT System S.A. immediately.

Suppliers shall provide the necessary support to NTT System S.A. and its authorized representatives, in monitoring compliance with the provisions of the Code of Conduct as well as the applicable laws, supporting the Company and its representatives in any proceedings concerning suspected violations of the law.

3. Compliance with law and business practices

When conducting business in cooperation with or on behalf of NTT System S.A., all Suppliers must maintain full compliance with applicable laws and regulations and must abide by requirements including, but not limited to the following:

3.1 Anti-corruption integrity

1. Suppliers undertake to comply with the Anti-Corruption Laws of the countries in the territories of which they operate (hereinafter referred to as "Anti-Corruption Laws") as well as international conventions. Suppliers shall not offer gratification in the form of cash or any other gifts, as well as make promises to transfer things of value, or authorize third parties to do so in order to influence the action or decision of a government official or employee of NTT System S.A. in such a way as to induce them to assist in obtaining or maintaining business cooperation, act in violation of the law and applicable ethical standards, or conduct business transactions.
2. Suppliers undertake to maintain – throughout the period of cooperation with NTT System S.A. – their own anti-corruption policies.
3. In the event of entrusting the performance of a part of the contract concluded with NTT System S.A. to a third party or using the services of a third party in connection with the performance of the contract (such persons are classified as "Associates"), Suppliers undertake to impose anti-corruption obligations on their Associates.

The Suppliers state that no member of their company's governing bodies has been convicted of bribery, corruption, fraud or offenses against property.

Suppliers must base their business decisions on sound assessments of their Suppliers' products and services.

In particular, NTT System S.A. does not tolerate bribes, money laundering, kickback commissions or extortion of any kind.

Suppliers are required to implement procedures and internal control measures to ensure compliance with Anti-Corruption Lawd. Suppliers agree to diligently cooperate with NTT System S.A. in evaluating the effectiveness of this program.

NTT System S.A. will not agree to cooperate with entities for which there is clear evidence or reasonable suspicion that they offer or accept bribes, non-contractual commissions or engage in other illegal activities.

3.2 Financial integrity

Suppliers are required to maintain compliant financial and business records.

4. Compliance with the Antitrust Law and Competition Protection Regulations

NTT System S.A. complies with Antitrust and Competition Protection Regulations with utmost diligence. NTT System S.A. ensures compliance with the aforementioned laws in all countries in which it operates and requires the same from its Suppliers.

Failure to comply with the aforementioned laws and regulations can result in high fines and may even result in imprisonment.

Competition Protection Regulations prohibit, among other things:

1. establishing, correcting and controlling prices, in violation of the law;
2. "setting up" unlawful tender procedures, boycotting appointed Suppliers or Clients;
3. market sharing by Suppliers or Clients;
4. manipulation of tenders;
5. controlled reduction of production or sales of certain products;
6. participation in discussions affecting fair competition;
7. forcing the purchase of exclusively NTT System S.A. products.

5. Compliance with trade laws and regulations

NTT System S.A. conducts its global operations in compliance with import and export laws and regulations, and complies with imposed economic, financial and trade sanctions. Suppliers, cooperating with NTT System S.A., are required to follow suit accordingly.

Failure to comply with the aforementioned laws and regulations may result in restrictions on further exports of our products, high fines and may even result in imprisonment.

6. Environmental protection

The conduct of all Suppliers must be responsible and environmentally safe, and in compliance with applicable regulations.

NTT System S.A. expects all Suppliers to share its commitment to environmental protection. The Company operates to minimize the negative impact of its operations on the environment and reduce environmental pollution throughout the entire supply chain.

Efforts are made to optimize energy use and analyze energy efficiency. The Company has procedures for purchasing energy-efficient equipment and supervises its infrastructure to ensure efficient energy consumption and management.

The Company is taking steps towards responsible management of water consumption and wastewater treatment by implementing rules of conduct and monitoring consumption, which minimizes environmental impact and builds long-term supply chain resilience.

The Company expects similar actions from its Suppliers. All Suppliers are required to comply with applicable environmental laws and regulations, including those governing electricity, hazardous materials, waste, water consumption, wastewater treatment, emissions of pollutants into the air, water, and soil, as well as requirements prohibiting or restricting the use of specific substances during product production or design. The Company monitors these issues based on information published by key suppliers in the supply chain.

NTT System S.A. has implemented the ISO 14001 standard of Environmental Management Systems and the ISO 50001 standard of Energy Management Systems which provide the following benefits:

- reduction in energy and raw material consumption as a result of the use of savings potential;
- fulfilling the requirements of Clients in the field of environmental protection;
- improvement of public image through reduction of adverse environmental impact;

- improving the management of the organization (planning, setting goals and objectives along with programs);
- prompt detection of environmentally hazardous sites and processes through regular internal and external audits.

Following the requirements of the Environmental Management Systems and the Energy Management Systems, the Company aims to minimize the environmental impact of its activities, which leads to a reduction in environmental contamination.

7. Compliance with human rights, labor laws and fair employment practices

A very important element in the operation of NTT System S.A. is protecting its employees, ensuring their good health and quality of life through specific actions such as the use of personal protective equipment, and monitoring of the work environment. This is a very important element in running a responsible business, so the Company requires Suppliers to follow suit accordingly.

Suppliers undertake to respect the basic human rights of their employees as well as of their own Suppliers.

Suppliers are required to comply with, among other things, the following:

- occupational health and safety regulations;
- regulations regarding the rights of persons with disabilities;
- labor laws of the countries with which they cooperate as well as their own;
- human rights legislation;
- provisions found in employment contracts with employees, including ensuring that remuneration is paid in a timely manner and in accordance with the contract amount;
- non-discrimination on the basis of, but not limited to, gender, age, disability, religious and political views, ethnic or social origin, marital status, sexual orientation;
- prohibition of child labor;
- prohibition of forced labor, slavery;

and ensure:

- clear terms and conditions at the stage of recruitment as well as employment;

- access to documents related to remuneration and employment for all employees.

7.1 Working hours

NTT System S.A. requires its Suppliers to ensure that the number of working hours per week is in accordance with applicable domestic regulations and that the maximum number of working hours does not exceed 60 hours per week, including overtime, except in emergency or extraordinary situations. The Supplier should provide its employees with at least one day off per week.

7.2 Juvenile worker

Regarding the employment of juveniles, the Supplier shall comply with domestic as well as international laws.

A juvenile may be admitted to work for occupational training or performing light work. A juvenile worker is required to pursue education until the age of 18. Employment of juvenile workers for the purpose of occupational training shall include theoretical and practical preparation for that occupation. An employment contract entered into with a juvenile worker should be concluded in writing. Work performed by juvenile workers must not endanger their life, health and mental or physical development.

A juvenile worker shall not work overtime or during the night.

7.3 Employee Representation / Right to association and bargaining

All employees should have the right to form, join and organize trade unions, employee committees of their own choosing, authorized to conduct collective bargaining on their behalf with the Employer.

In circumstances where national laws restrict the freedom of association and collective bargaining, Suppliers should allow Employees to freely and democratically elect their own Representative(s) to defend the rights and interests of Employees.

NTT System S.A. expects the following standards to be followed at Supplier's factories:

- Employee Representation is composed of democratically elected representatives of non-management personnel, independent of local and state authorities;

- The number of representatives is proportional to the number of workers in the factory and falls within the range of 1 per 50-100 workers;
- Employee Representation has the right to represent employees in collective bargaining with the Management;
- The Employee Representation may perform its duties in an organized Employee Committee, during its working hours, without any deductions from salary;
- The Management does not intervene or interfere with the nomination, selection, operation and management of the Employee Committee in any way;
- The Employee Committee may set and implement some or all of the goals it sets for itself with the aim of achieving improvements in working conditions, working hours, wages and benefits;
- The Employee Committee is free to pursue its objectives without being subjected to discrimination, harassment, intimidation or retaliation for being Employee Representative(s) or being involved with the Employee Representation;
- All employees have access to Representatives in their workplace;
- Employee Representatives have the opportunity to hold meetings with all new employees to discuss and explain to them their employment rights;
- Members of the Employee Committee may attend Committee training sessions during normal working hours without deductions from their salaries;
- Factory management provides materials and spaces for the Committee's meetings with workers.

NTT System S.A. expects proper communication between the employees and the management of the Suppliers' factories, and therefore expects that:

- The Employee Committee is allowed to meet regularly with management to promote and defend the rights and interests of employees;
- The Employee Committee shall have access to:
 - risk assessments;
 - internal audits as well as the monitoring of the organization;
 - management review reports;
 - opening and closing meetings of audits conducted at the factory;
 - reports sent to the employees or factory management about any and all corrective and preventive actions taken and/or the effects of the actions taken.

8. Compliance with privacy and data protection laws

Suppliers are required to only process the personal data obtained in accordance with applicable law and solely for legitimate business purposes. In accordance with the agreements concluded, NTT System S.A. expects

the implementation of required safety measures to ensure the security of personal data. Suppliers must ensure that the processing of any personal data acquired from NTT System S.A. is in compliance with applicable laws. That includes enforcing subcontractors to comply with not less than the same requirements that apply to the Supplier's relationship with NTT System S.A.

NTT System S.A. expects to be promptly notified of any personal data security breaches.

9. Protection of confidential information

NTT System S.A. expects the Suppliers to comply with the principles of fair competition. Suppliers are obligated not to use illegally obtained trade secrets and/or confidential information. The acquisition, downloading or unauthorized use of information that NTT System S.A. deems confidential constitutes theft of NTT System S.A. property.

10. Conflict minerals

NTT System S.A. does not engage in the sale of products containing conflict minerals.

The Suppliers of NTT System S.A. shall implement a mineral chain of custody system to prevent, through conscious or unconscious means, the violation of existing regulations prohibiting the use of conflict minerals.

11. Reporting of suspected violations

In the event of an identification of a potential problem related to a possible violation of the Anti-Corruption Laws, the Parties agree to provide information to the other Party and conduct consultations.

At the moment of obtaining credible information about the conduct of The Supplier or its employee which does not comply with the guidelines contained within the Code, NTT System S.A. requests to be contacted by means of the form provided on the ntt.pl website or via e-mail at: naruszeniacs@ntt.pl

12. Final Provisions

The NTT System S.A. Supplier Code of Conduct is the key to mutual cooperation and the most important document on the basis of which the Company shall undertake responsible cooperation with Suppliers, which is carried out taking into account solidarity partner values. The Code serves to ensure that the Company's operations are conducted in an ethical manner with respect for employees, society as well as the environment. NTT System S.A. treats Suppliers as part of its "extended enterprise" and wants them to meet the same sustainability standards as the Company.

NTT System S.A. aims to promote the idea of social responsibility and wishes to cooperate with Partners that respect human rights and act in accordance with legal regulations, provide safe and respectable working conditions, abide by ethical standards and are concerned with the environment. The company encourages all those with whom it cooperates to adhere to the same principles because only compliance with honest and fair sales and marketing practices leads to the growth of our companies.



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