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# Governance

## Remaining Trustworthy and Mission-oriented

Society expects companies to fulfill a wide range of responsibilities, from providing new value through products and services to maintaining a corporate culture of integrity and fairness. We will always place compliance at the foundation of our operations as a trusted corporate group.

To achieve sustainable corporate growth and continuously contribute to realizing a sustainable future, we are committed to practicing efficient governance and solid compliance across the Group. In particular, the trend toward remote interactions has heightened the importance of ensuring information security as a social concern, and we have been actively preventing problems and providing countermeasures. We will remain faithful to our corporate mission, core beliefs, and policies in order to ensure each and every employee takes action with a sense of responsibility and strive to establish corporate governance and compliance systems throughout the Group to construct an efficient, legally compliant, and ethical management foundation.

Up to the present and into the future, we will endeavor to realize solid governance and enhance corporate value as we continue to advance as a company that has earned the public's trust.



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Priority Activities

## Thorough Compliance and Risk Management

### Our Approach

Under the NTT Group Corporate Ethics Policy, NTT Communications will not only adhere to laws and ordinances but will also engage in its daily operations with high ethical standards as a corporate group that retains the trust of all stakeholders, including customers, business partners, shareholders, and society as a whole. We have been developing our compliance promotion framework in accordance with our Global Compliance Regulations, through measures such as establishing a Compliance Committee and assigning compliance promotion leaders and staff to each unit and Group company. At the same time, we consistently promote compliance management across the NTT Communications Group by disseminating top management messages, educating and training employees, and operating points of contact for internal reporting.

We also prepare against various business risks, including large-scale disasters, by establishing systems and mechanisms that enable us to effectively respond to risks in our business operations. This is done under the leadership of the Business Risk Management Committee and involves annually reviewing and revising risk identification, response policies, and countermeasures. In addition to improving Groupwide risk sensitivity and handling the risks that have materialized, these activities are intended to build a system for addressing environmental and social risks in the future through a concerted Group effort.

### Main Achievements in Fiscal 2022 and Goals for the Coming Years

As part of our ongoing compliance efforts, we are fostering awareness of risk management and conducting compliance training. Attendance for the NTT Communications Group as a whole rose to 99.1% in fiscal 2022 from 98.9% in fiscal 2021, while the implementation rate for the corporate ethics survey rose to 95.2% from 94.1% in fiscal 2021. We also conducted training to promote understanding of harassment and management, and to raise awareness of the importance of good communication and building favorable working environments. We will continue to work on establishing a compliance foundation with integrity to promote harmony and mutual understanding among employees and adapt to the new structure and processes.

In addition, we are striving Companywide to continuously enhance our risk management system. In fiscal 2022, the Business Risk Management Committee met twice, and Business Risk Management Subcommittee meetings were held 12 times. We reviewed the three material risks for fiscal 2022—the COVID-19 pandemic, information security, and resilience—and designated geopolitics, corporate governance, and information security as material risks that require a focused effort for fiscal 2023.

### Sharing High Ethical Standards and Ensuring Compliance

#### Continuous Strengthening of Corporate Governance

- Our Foundational Mission, Core Beliefs, and Business Vision

The NTT Communications Group took the opportunity of its 20th anniversary in 2019 to establish its mission, “Creating communication methods that open up new possibilities for people and our world,” and its core beliefs, “Take the initiative,” “Inspire Each Other,” and “Respond to Society’s Needs.”

Our mission expresses the purpose of our business while also reflecting our stance of generating innovative businesses to realize a world in which the inherent strengths and qualities of individuals, organizations, and societies are demonstrated to maximum effect. Our core beliefs embody the values that all of us should uphold in meeting our mission, with the underlying intention of creating value that exceeds society’s expectations by exercising individual initiative.

These represent the cornerstone for management and individual employees as all of us think and act at our own initiative to accomplish our mission of creating innovative and unprecedented communication methods and new value for the future.

We can advance toward achieving our goals by sharing and broadly establishing our mission and core beliefs, which are the result of a united effort drawing upon repeated discussions by employees, the president, and

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members of management. At times, we may become uncertain about the decisions and actions that meet the needs of stakeholders in our relationship with them. Whenever this concern arises, we will reflect on our proper course of action as a company serving society by returning to business activities based on our mission and core beliefs. Through these actions, we will strive to become a trusted company that satisfies the needs of customers and society.

In addition, the NTT Communications Group is upholding its new medium-term business vision of Re-connect X to fulfill its corporate mission in the “new normal” society that has been forced to undergo rapid change due to the spread of the COVID-19 pandemic.

As a general variable, “X” can signify anything. Together with our customers and partners, we will strive to help bring about a sustainable future by safely and securely connecting and re-connecting everything, and by collecting, storing and analyzing data, and providing feedback.

We believe that maintaining our business activities based on our mission, core beliefs, and business vision in a lawful, fair, and ethical manner contributes to meeting the SDG 10 “Reduced Inequalities” and SDG 16 “Peace, Justice and Strong Institutions.”

For more information on our mission, core beliefs, and business vision, see: [https://www.ntt.com/about-us/we-are-innovative/vision.html?link\\_id=ostp\\_mdd\\_about](https://www.ntt.com/about-us/we-are-innovative/vision.html?link_id=ostp_mdd_about) (in Japanese only)

For more information on Re-connect X, see: <https://www.ntt.com/en/about-us/re-connectx.html>

Corporate Governance

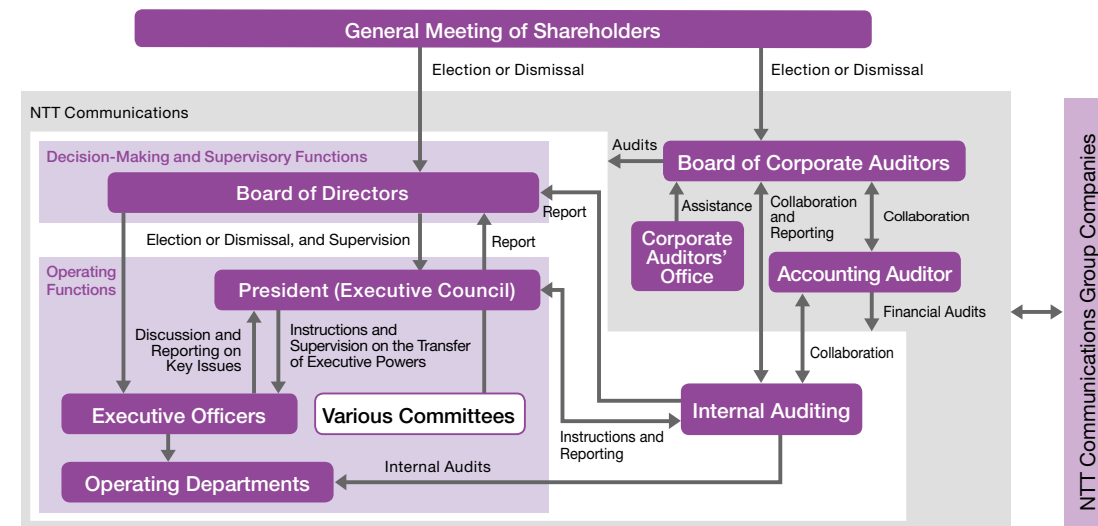
Corporate Governance Structure

NTT Communications has adopted a governance structure based on a system of Board of Directors and Board of Corporate Auditors and has recently assigned outside directors to bolster its governance functions. The board comprises eight members and is chaired by the president. In principle, it meets once a month to make key management decisions in compliance with laws and regulations, the Articles of Incorporation, and the Board of Directors’ rules.

We have set up an Internal Audit Department at the

head office to conduct annual internal audits by selecting audit items based on the results of risk assessment to minimize or prevent management risks and boost corporate value. The Board of Corporate Auditors comprises three auditors. In addition to attending important meetings such as those of the Board of Directors, they hold meetings of the Board of Corporate Auditors to audit the execution of directors’ duties with an emphasis on confirming the legality and appropriateness of management decisions. A dedicated organization and staff facilitate efficient audit operations. The corporate auditors conduct their audits in close cooperation with accounting firms and the Internal Audit Department by periodically sharing information on audit plans and results.

[ Corporate Governance Structure ]



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● Appointing Directors

Directors are appointed with the expectation that they will utilize their extensive knowledge and insight in their respective fields.

[ Composition of Board Directors and Auditors (as of June 14, 2023) ]

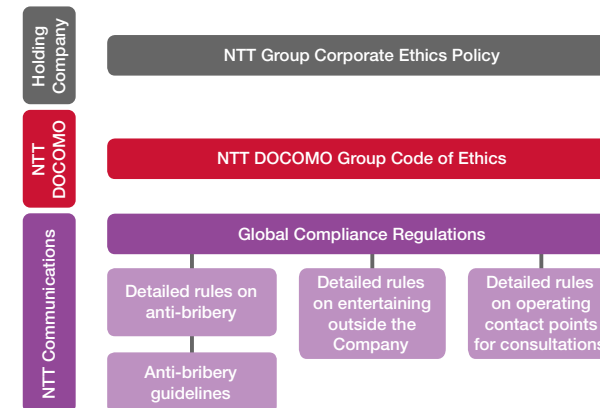
Directors	Name	Main Responsibilities and Roles
President and CEO Representative Member of the Board of the Company	Toru Maruoka	
Senior Executive Vice President Representative Member of the Board of the Company	Hidemune Sugahara	In charge of sales In charge of Global Business In charge of Digital Transformation
Senior Executive Vice President Representative Member of the Board of the Company	Keigo Kajimura	Executive Vice President of Platform Service Division In charge of Technology & Innovation, and Information Security
Senior Vice President Member of the Board	Hisashi Fujishima	Senior Vice President of Corporate Planning
Members of the Board	Masaaki Shintaku	
	Ikuko Suzuki	
	Minako Tsumenaga	
	Naoki Nakaminami	
Audit & Supervisory Board Members	Sakuo Sakamoto	
	Shuji Ota	
	Masanori Ozawa	

Continuously Enhancing Compliance Activities as a Company that Is Consistently Trusted by Society

Compliance Promotion Framework

The NTT Communications Group acts in accordance with the NTT Group Corporate Ethics Policy, established by Nippon Telegraph and Telephone Corporation and applied throughout the NTT Group, as well as the NTT DOCOMO Group Code of Ethics, established by NTT DOCOMO, Inc. and applied across the NTT DOCOMO Group. To address compliance issues in Japan and overseas that have become increasingly complex in nature, NTT Communications will not only adhere to laws and ordinances but will also engage in its daily operations with high ethical standards as a corporate group that retains the trust of all stakeholders, including customers, business partners, shareholders, and society as a whole.

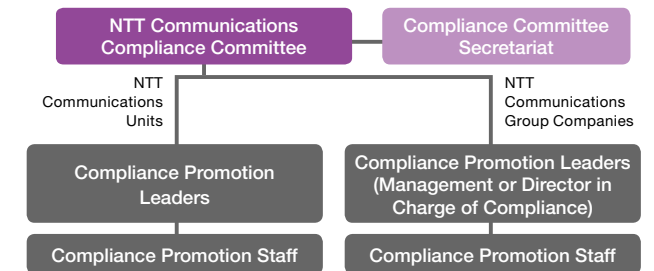
[ Framework of Important Internal Rules on Compliance ]



Specifically, we maintain the relevant rules under the Global Compliance Regulations that serve as the standard compliance policy for the NTT Communications Group. We also promote compliance led by the Compliance Committee, which is chaired by a senior executive vice president and supervises compliance promotion leaders and staff assigned to each unit and Group company. Under this framework, we consistently promote compliance management across the NTT Communications Group by disseminating top management messages on compliance, training employees, operating points of contact for internal reporting, and conducting internal audits to confirm and improve the ongoing initiatives at each Group company.

The Compliance Committee consists of compliance promotion leaders (heads of each unit) of NTT Communications and presidents of each Group company and meets regularly every six months to provide a forum for sharing the status of reporting at internal points of contact and holding discussions on measures for establishing corporate ethics. The committee reports on the content of its discussions for each fiscal year to the Executive Council and Board of Directors of NTT Communications.

[ Compliance Promotion Framework ]



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Looking ahead, even as we respond to regulatory changes in Japan and overseas and the evolving business environment, management and all Group employees will engage in ethical business practices and seek to strengthen the Group's compliance system worldwide.

 For more information on the NTT Group Corporate Ethics Policy, see: <https://group.ntt/en/csr/governance/compliance.html>

### Awareness-raising Programs and Training for Thorough Compliance


To ensure thorough legal compliance and fair business activities, companies are required to implement ongoing awareness and training programs for employees and directors. The NTT Communications Group is actively pursuing internal awareness-raising activities through various programs including compliance training, and by conducting employee awareness surveys on corporate ethics, inviting entries for compliance slogans, and regularly providing information via the internal website.

Every year, we provide compliance training for all employees and directors. In fiscal 2022, we covered basic themes related to legal compliance in Japan and overseas, such as the Whistleblower Protection Act, prevention of harassment, and laws and regulations related to the use of data. We also organized additional training on specific themes such as key considerations for information management, including personal information protection, post-pandemic workstyles such as hybrid workstyles, conduct risk, and integrity. Attendance for the NTT Communications Group as a whole was 99.1%.

We are continuing training in fiscal 2023 on themes that

address changes in the business environment, such as promoting fair sales activity, appropriate use of SNS, and adapting to the post-pandemic era. By enhancing content and increasing attendance, we are working to strengthen compliance management across the Group.

In light of the increasing importance of supply chain compliance, including enforcing legal compliance among subcontractors, we include a clause seeking compliance with guidelines such as the NTT Communications Corporation Guidelines for Sustainability in Supply Chain in our subcontracting agreements as part of an ongoing effort to ensure compliance across our operations, including the supply chain.

 For more information on our procurement activities, see: <https://www.ntt.com/en/about-us/procurement.html>

### Initiatives for Preventing Corruption

To ensure compliance with the prevailing laws and regulations in Japan and overseas on preventing corruption, including bribery and bid-rigging, NTT Communications adheres to the Anti-Bribery Handbook compiled by its parent company Nippon Telegraph and Telephone Corporation, as well as its own internal rules, to prevent corruption.

We have stipulated detailed rules against bribery as well as prevention guidelines under the Global Compliance Regulations to clearly demonstrate we have proper measures in place to combat this concern, and we are determined to stringently address specific acts of bribery such as facilitation payments. As part

of our Groupwide effort to prevent corruption, we follow procedures in various countries with regard to prior approval in cases where providing benefits to public officials are tolerated under law and examine the eligibility of agents and consultants hired to execute our operations. We also include prevention of corruption as a topic in our compliance training in an ongoing effort to raise awareness.

We are continuing to ensure fairness in operating our business by reviewing the rules on entertaining outside the Company, which was established in August 2021 in response to such factors as changes in the external environment.

### Appropriate Advertising

Telecommunication services such as the Internet and smartphones have become indispensable infrastructure for daily life and business. Moreover, these areas are undergoing rapid technological innovation in which the content, providers, contracts, and other aspects related to services used by customers are becoming increasingly sophisticated and diverse.

NTT Communications will create new value by proposing fixed-mobile convergence services and integrated solutions under the corporate business brand "docomo business" and will provide these services to all types of customers, from large corporations to small and medium enterprises. In light of the evolution of the business environment, such as expanded service offerings and the rising number of customers, we are required to provide customers with more appropriate information and to display advertisements in an easy-to-

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understand manner. To this end, NTT Communications practices established operational procedures, including an accountability system related to advertisements and a screening system for advertising. At the same time, we continuously strive to ensure the proper display of advertisements that are easy to understand by reviewing our advertising screening system and business processes in light of “docomo business.”

## Initiatives on AI Ethics

With regard to artificial intelligence (AI), we are now observing more frequent uses of generative AI in daily life, even as it is also being promoted for specific applications in such areas as automated driving and robotics. On the other hand, AI is still in its technological infancy, with the risk that it may become entangled with ethical issues such as discrimination and prejudice, legal concerns such as copyrights, and other problems such as information leakage. In view of our pursuit of businesses such as Smart World and B2B2X, we formulated the NTT Communications Group Basic Policy on AI in April 2021 with the objective of ensuring the sound and reliable use of AI founded on an understanding of its possibilities and inherent risks, and are applying the policy to manage service development and other processes.

For more information on the NTT Communications Group Basic Policy on AI, see: <https://www.ntt.com/en/about-us/cs/principle.html>

## Consultation Hotline

The NTT Group has established a common external contact point for consultation and reporting operated by a law firm for all Group companies. The NTT Communications Group has also set up its own hotline for reporting and consulting on compliance issues and a contact point for consulting on human rights issues. We are fostering an open corporate culture by creating an environment that encourages employees to seek consultation and by swiftly and appropriately responding to their concerns and reports.

In fiscal 2022, a total of 73\* incidents related to the NTT Communications Group (43 related to harassment, 23 to dissatisfaction in the workplace, 5 to labor, and 18 others based on a broad categorization) were reported through the channels described above. The Compliance Office responded appropriately to the reports based on the judgment of the chairperson of the Compliance Committee, and investigated the facts and obtained third-party expert opinions as required, prior to implementing the necessary actions to prevent recurrence.

We are striving to improve our hotline so that it is easier to access for reporting and consultation by operating it in accordance with internal rules such as the Global Compliance Regulations under the revised Whistleblower Protection Act. These regulations stipulate the ability to submit reports anonymously, the necessary measures that will be implemented to ensure that whistleblowers are not treated unfairly as a result of filing a report, and that those involved in an investigation will be bound by confidentiality with regard to information contained in the report.

\*The total figure does not add up because a single report may include several incidents.



For more information on the external contact point for the NTT Group Corporate Ethics Helpline, see: <https://group.ntt/en/csr/governance/pdf/Help-Line.pdf>

## Corporate Culture for Maintaining and Improving Business Ethics

The NTT Communications Group regards integrity as a higher voluntary and proactive value that allows all of us to sincerely respond to society and stakeholders and to build trust, both as individuals and as a company. Accordingly, we are working to embody and instill integrity through measures such as compliance training.

In our corporate ethics survey for fiscal 2022, the ratio of employees responding that their workplaces have an open atmosphere was 95.8% (average positive response rate for related questions). We will continue to foster an open corporate culture to establish an integrity-based compliance infrastructure as a company that continues to be trusted and exists in harmony with society.

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**Continuously Upgrading the Risk Management Structure**

**Business Risk Management**

The basic elements of risk management are defined in the Risk Management Rules we established to achieve sustainable corporate growth by anticipating and preventing the occurrence of potential risks that exist in and around our business and by minimizing any loss in the event they materialize. As a system and mechanism for effectively addressing major risks that may affect our business management, we set up the Business Risk Management Committee, chaired by the senior executive president, to construct and implement a PDCA cycle for risk management.

The heads of units and presidents of Group companies comprising the members of the Business Risk Management Committee meet twice a year to address the changing business environment by defining risks that require action, identifying material risks, and discussing issues such as initiatives for promoting risk management. In fiscal 2023, the committee focused on the current status of internal and external risks as well as their impact and scope to identify 19 items, which were also assessed according to their assumed frequency of occurrence and impact. As a result, information security was identified and addressed as a material risk for the second consecutive fiscal year. In addition, we have recently designated geopolitics as a key risk due to the need to promote and strengthen new initiatives in response to economic security legislation,

as well as corporate governance, in order to strengthen effective initiatives under the “docomo business” brand, and measures for risk management were reinforced accordingly. Each risk item, including material risks, is handled by a Business Risk Management Subcommittee consisting of all units that meet each month to implement a practical PDCA cycle for risk management by examining and analyzing the occurrence of risks and discussing countermeasures. Operational audits are conducted to confirm the status of each unit’s measures against risk, and similar activities are extended to principal Group companies in Japan to promote risk management throughout the Group.

**Crisis Management**

Since the Great East Japan Earthquake, we have seen growing public interest in crisis management for times of emergency, such as large-scale natural disasters. With a renewed awareness of our mission as a company responsible for maintaining social infrastructure through communication, we have strengthened our management structure to accelerate our response to contingencies and have sought to instill that awareness in all departments by ensuring strict adherence to manuals and organizing drills. In the event that a material risk occurs, we will set up a Disaster (Accident)/Risk Response Headquarters, headed by the president or senior executive president, as needed in order to provide the structure for gathering accurate information and making effective decisions. Thereafter the Disaster Response Headquarters will take the lead in addressing the situation on the ground.

In July 2021, we established the Supply Chain BCP Guidelines to strengthen business continuity across the entire supply chain. We are working to ensure stable procurement with the cooperation of our suppliers.

Since fiscal 2013, we have laid out an operational plan to prepare against a pandemic in compliance with the Act on Special Measures for Preparedness and Response against Pandemic Influenza and New Infectious Diseases, and we are currently formulating a related concrete business continuity plan.

Furthermore, to comply with Japan’s Disaster Countermeasures Basic Act and Act on Measures for Protecting Japanese Nationals in Armed Attack and Other Situations, we have established and publicly disclosed our Operational Plan for Disaster Prevention and Operational Plan for the Protection of Japanese Nationals in order to fulfill our responsibility as a designated public institution.

For more information on NTT Communications’ initiatives against disaster, see: <https://www.ntt.com/about-us/cs/saitai.html> (in Japanese only)

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Internal Controls

In accordance with the new Companies Act, enacted in May 2006 and revised in May 2015, NTT Communications has drawn up basic policies for establishing a system of internal controls for the entire NTT Group. Concurrently, as a member of the NTT DOCOMO Group, the Board of Directors resolved to implement the measures necessary for the system. We are also working to reinforce and upgrade internal controls over financial reporting in line with the requirements of the Financial Instruments and Exchange Act, enacted in June 2006.

Basic Approach for Maintaining an Internal Control System

1. In maintaining a system of internal controls for complying with laws and regulations, managing any risk from losses and carrying out proper and efficient business operations, NTT Communications takes a variety of measures to prevent and minimize loss.
2. NTT Communications has established the Legal and Internal Audit Department to maintain and assess effectiveness with regard to operational status of the above system of internal controls. As a monitoring organization, the department is responsible for regular audits and special audits of high-risk areas common to the NTT Group, in keeping with the standardized auditing criteria of NTT. The necessary improvements are made following assessments of system effectiveness.
3. NTT Communications will cooperate with NTT DOCOMO, INC. and take appropriate measures to ensure the reliability of its system of internal controls for financial reporting under Japan's Financial Instruments and Exchange Law.
4. The president is responsible for ensuring the development and implementation of the system of internal controls.
5. We will take all necessary steps to comply with NTT DOCOMO, INC.'s Basic Policies Concerning the Maintenance of Internal Control Systems.

Internal Audits

At NTT Communications, Internal Auditing plans to achieve its goal of implementing audits that benefit management by taking the lead in conducting internal audits of internal organizations and Group companies, with an emphasis on business risks. By conducting internal auditing activities throughout the year, we seek to reduce and prevent the manifestation of management risks while also proposing operational improvements to enhance the corporate value of the entire NTT Communications Group.

In fiscal 2022, we placed importance on the impact of the business integration with NTT DOCOMO and NTT COMWARE and worked to establish and confirm operation of an internal control framework Groupwide, focusing on newly established organizations and companies that had recently joined the NTT Communications Group. Since fiscal 2018, we have been conducting our internal audits using a digital auditing method (for detecting signs of inadequacy and fraud, and conducting continuous risk monitoring based on CAAT\*), which was quickly introduced to new organizations and companies. We also analyzed digital audits for domestic Group companies more frequently to conduct more timely audits.

In addition, while utilizing digital auditing, we have also initiated full-scale auditing based on real-world communication. In particular, we visited eight branches nationwide, along with new organizations and domestic and overseas Group companies that recently joined the NTT Communications Group to provide guidance and support for establishing internal controls.

In fiscal 2023, to address information security and geopolitical risks and respond to additional business structure reforms, we designated the basic audit, themed audit, information security and systems audit, and NTT Group priority audit as the four pillars of our internal auditing. This framework will further strengthen the NTT Communications Group's internal controls overall by (1) continuing to upgrade and expand the scope of data-driven audits, and (2) reinforcing an on-site, real-world approach through face-to-face interviews.

\*Computer-assisted audit techniques is an auditing method centered on big data analysis. Business Intelligence (BI) tools are used to visualize the results of analysis to reveal signs or trends of declining performance or fraud.



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Our Approach

We will manage the entire supply chain with high ethical standards by promoting and strengthening the sustainability of NTT Communications Group suppliers to ensure a reliable procurement system for our customers. To that end, we established NTT Communications Corporation Guidelines for Sustainability in Supply Chain and focus on developing mutual understanding and relationships of trust with our suppliers. At the same time, we are developing a procurement system based on the concept of sustainable procurement, which extends beyond environmental issues, with thorough consideration of humanitarian and social issues as well. We will strive to enhance our partnerships to properly understand and address the impact of our business activities on the value chain and engage in a dialogue with our stakeholders to meet the various requests and expectations from society, toward operating business on the trust of our stakeholders.

[ Summary of NTT Communications Corporation Guidelines for Sustainability in Supply Chain ]

Procurement Policies

1. NTT will strive to provide competitive opportunities with fairness to both domestic and foreign suppliers, and to build mutual trust and understanding.
2. NTT will conduct economically rational procurement of competitive goods and services that meet its business needs, deciding suppliers based on quality, price, delivery times and stable supply in a comprehensive manner.
3. NTT will contribute to realizing a sustainable society by doing procurement with an emphasis on human rights, the environment, safety, and other critical issues, in compliance with laws and social norms.

With the basic ideas of the previous Guidelines for CSR in Supply Chain, the new guidelines clarify the positioning of our requests to suppliers (code of conduct). The guidelines as a whole now require stronger cooperation, such as requesting primary suppliers to take responsibility for seeking compliance from upstream suppliers, establishing management systems to comply with each guideline, and taking actions such as suspending business with suppliers who do not correct violations. The content of each specific item has also been enhanced.

[ NTT Communications Corporation Guidelines for Sustainability in Supply Chain ] ★ Indicates the main additions and enhanced item

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<p><b>Introduction</b> ★</p> <p><b>Requests to Suppliers (Code of Conduct): Common Matters</b></p> <ol style="list-style-type: none"> <li>1. Build management systems ★</li> <li>2. Detect inappropriate activities early by building complaint processing mechanisms</li> <li>3. Publicize and disclose the status of initiatives related to these guidelines</li> </ol> <p><b>I. Human Rights and Labor</b></p> <ol style="list-style-type: none"> <li>1. Prohibit forced labor ★</li> <li>2. Prohibit inhumane treatment</li> <li>3. Prohibit child labor and make considerations for young workers</li> <li>4. Prohibit discrimination ★</li> <li>5. Proper wages and allowances</li> <li>6. Regulate working hours</li> <li>7. Respect the right to freedom of association and collective bargaining</li> <li>8. Implement human rights due diligence in the supply chain ★</li> <li>9. Promotion of "Technology that is based on high ethical standards."</li> </ol> <p><b>II. Occupational Health and Safety</b></p> <ol style="list-style-type: none"> <li>1. Occupational Safety</li> </ol>	<ol style="list-style-type: none"> <li>2. Apply safety measures for equipment and instruments</li> <li>3. Promote hygiene in the workplace</li> <li>4. Apply appropriate measures for occupational injuries and illnesses ★</li> <li>5. Prepare for and respond to emergencies</li> <li>6. Consider physical workload</li> <li>7. Promote safety and hygiene in company facilities</li> <li>8. Conduct health maintenance programs for employees</li> <li>9. Communicate about safety and hygiene</li> </ol> <p><b>III. Environment</b></p> <ol style="list-style-type: none"> <li>1. Obtain environmental permits and report to the government</li> <li>2. Manage chemical substances contained in products</li> <li>3. Manage chemical substances</li> <li>4. Minimize environmental pollution (wastewater, sludge, exhaust, noise, vibration, etc.)</li> <li>5. Reduce energy consumption and greenhouse gas emissions ★</li> <li>6. Reduce environmental burden by implementing product assessment</li> <li>7. Effectively use resources and manage waste</li> <li>8. Conserve biodiversity ★</li> <li>9. Implement environmental investigations in the supply chain</li> </ol>	<p><b>IV. Fair Trade &amp; Ethics</b></p> <ol style="list-style-type: none"> <li>1. Prevent corruption and illegal political contributions, prohibit improperly providing or receiving benefits</li> <li>2. Prohibit abuse of dominant bargaining position</li> <li>3. Execute business fairly</li> <li>4. Respect intellectual property</li> <li>5. Appropriately manage imports and exports</li> <li>6. Prevent improper acts</li> <li>7. Responsibly procure minerals and carry out due diligence</li> </ol> <p><b>V. Product Quality and Safety Product Quality and Safety</b></p> <ol style="list-style-type: none"> <li>1. Ensure product safety</li> <li>2. Provide accurate product and service information</li> </ol> <p><b>VI. Information Security</b></p> <ol style="list-style-type: none"> <li>1. Provide products and services that take into consideration security and privacy ★</li> <li>2. Prevent the leaking of confidential information</li> <li>3. Protect personal information</li> <li>4. Take countermeasures against cyber attacks on one's own company</li> <li>5. Respond to security incidents ★</li> </ol> <p><b>VII. Formulate business continuity plans</b></p>

For more information on the NTT Communications Corporation Guidelines for Sustainability in Supply Chain, see: [https://www.ntt.com/content/dam/nttcom/hq/en/about-us/procurement/pdf/SustainabilityGuidelines\\_E\\_202211.pdf](https://www.ntt.com/content/dam/nttcom/hq/en/about-us/procurement/pdf/SustainabilityGuidelines_E_202211.pdf)

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**Main Achievements in Fiscal 2022 and Goals for the Coming Years**



In order to realize the sustainable procurement concept, we will thoroughly promote the procurement of products with minimal impact on the environment by conducting product assessments with the cooperation of suppliers. Also, we will encourage the worldwide adoption of supply chains that do not engage in the trade of conflict minerals or in any way intensify social and humanitarian problems. Under this concept, we have been continuously conducting sustainable procurement promotion surveys of our suppliers since fiscal 2016. In fiscal 2022, we also began utilizing EcoVadis\*1, a global rating organization, to conduct SAQs on about 130 suppliers covering roughly 90% of the NTT Group's total procurement to identify risks.

In fiscal 2023, we will continue to build on the supplier surveys while simultaneously taking steps to promote the exchange of opinions with suppliers and increase information disclosure. We will also continue to provide supplier information to EcoVadis.

Furthermore, we are engaged in multifaceted activities with a primary focus on continuous customer satisfaction surveys as our main measure for continuously improving customer satisfaction. In fiscal 2020, we revised the methodology of our voice of customer (VOC)

survey. The process enabled us to respond to survey results by identifying priority issues from the customer perspective and quickly improving these issues, which we continued to do in fiscal 2022.

To more accurately understand customer expectations, we analyzed the correlation between “docomo business” brand recognition and NPS\*2, and surveyed the intention to use Company-paid mobile terminals, enabling us to formulate focused sales and service strategies for the corporate business of the new DOCOMO Group.

In fiscal 2023, in addition to the annual relational survey, we will consider introducing a transactional survey to probe deeper into customer expectations and issues while also strengthening the survey on digital customer contact points to improve sales performance and service development.

\*1 An organization that evaluates supply chain sustainability. Providing platforms for evaluating the sustainability of companies related to policy, measures, and achievements, EcoVadis conducts surveys and evaluations of suppliers in 175 countries and 200 industries from the perspective of four areas: the environment, labor conditions, business activities, and the supply chain.

\*2 Net Promoter Score. An indicator that measures customer loyalty, which is highly correlated with a company's growth rate and profitability.

**Collaboration with Suppliers to Ensure CSR Procurement and Green Procurement**

**Dissemination of Sustainable and Green Procurement**

We have formulated the NTT Communications Corporation Guidelines for Sustainability in Supply Chain, which encourage procurement policies for respecting human rights and protecting the environment, ensure the quality and safety of products and services, and recognize the overall needs of society. When selecting and entering into agreements with new business partners, we have designated our own sustainability compliance items, in addition to credit screening criteria, which include confirming corporate initiatives on human rights and labor issues. When we determine that a company has failed to meet our criteria and thus represents a risk, we do not trade with them.

To promote sustainable procurement, we conduct SAQs using EcoVadis, a global rating organization, and also hold meetings to exchange ideas on details and confirm that there are no risks.

While the target has been set to engages in direct dialogue with 40 supplier companies across the NTT Group each year in fiscal 2022, NTT Communications held direct dialogues with five key suppliers. In the course of developing mutual understanding and trust, we exchange views on human rights, the environment, information security, and other issues to promote further initiatives across the supply chain. Looking ahead, we will continue to work with our suppliers to promote sustainable procurement.

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For more information on the NTT Communications Corporation Guidelines for Sustainability in Supply Chain, see: [https://www.ntt.com/content/dam/nttcom/hq/en/about-us/procurement/pdf/SustainabilityGuidelines\\_E\\_202211.pdf](https://www.ntt.com/content/dam/nttcom/hq/en/about-us/procurement/pdf/SustainabilityGuidelines_E_202211.pdf)



For more information on green procurement, see: Contributions to the Global Environment.

## Developing Procurement Professionals

In maintaining sound Group management, we uphold our Sustainability Policy to thoroughly establish and enhance our awareness of sustainability through efforts that also involve suppliers. We encourage our employees to obtain the Certified Procurement Professional (CPP) qualification, designated by the Japan Management Association, so they can have specialized knowledge in purchasing and procurement. As of fiscal 2022, a total of 77 employees have been certified (Grade A: 31, Grade B: 46), including those transferred in fiscal 2022 and excluding those certified while working in other organizations. Looking ahead, we will continue nurturing human resources in each area to practice sustainable and responsible procurement.

The Procurement and Billing Department has also acquired ISO 14001 certification and engages in environmental protection. Every fiscal year, employees responsible for activities as core members are required to participate in ISO 14001 internal auditor training, and four employees took part in fiscal 2022. We also encourage the acquisition of environmental qualifications, and three employees have passed the Certification Test for Environmental Specialists (Eco Test). As in the past, we also provided video training in fiscal 2022 on the outline of

ISO 14001 and our environmental protection activities as an organization so that all employees in the department can actively participate in protecting the environment.

## UK Modern Slavery Act Statement

The NTT Communications Group had been disclosing its statement on slave labor and human trafficking in accordance with the UK Modern Slavery Act 2015. Due to the closure of our London branch on March 31, 2021, the Group is no longer subject to the disclosure of statements under this act. However, we will continue to build honest and sustainable relationships with a wide range of suppliers in Japan and overseas, procure quality services and products in an economical and timely manner, cooperate with suppliers to prevent slave labor and human trafficking, and continue to promote and strengthen our activities based on the Guiding Principles on Business and Human Rights.



For more information on human rights efforts in the value chain, see: Governance.

## Response to Conflict Minerals

The NTT Communications Group will promote initiatives to refrain from using conflict minerals under the NTT Communications Corporation Guidelines for Sustainability in Supply Chain and will conduct procurement activities in accordance with the guidelines. The response to conflict minerals by major suppliers is confirmed by conducting a questionnaire

survey aimed at checking the operational status of the NTT Communications Corporation Guidelines for Sustainability in Supply Chain.

## Disclosure of Supply Chain through EcoVadis

Rising public expectations for sustainability activities that also encompass the supply chain have increased the importance of companies knowing the status of their suppliers' sustainability activities and disclosing that information to clients. Since fiscal 2016, we have registered supply chain information with EcoVadis. We have also been proactively disclosing information to our clients and to companies considering doing business with us. We received a Silver rating in 2022 as a result. Our stance on the environment in particular was highly evaluated for setting quantitative targets for multiple related issues. We will continue to work to improve our sustainability performance in the areas of the environment, fair labor and human rights, ethics, and sustainable procurement.

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## Environmental Protection Activities as a Procurement Organization

The Procurement and Billing Department has been ISO 14001 certified since October 1999, and the scope of certification was expanded in fiscal 2022 to include the Billing Service section, which is responsible for billing and collection of Companywide charges, to create an environmentally sound society in a shared effort by the entire Procurement and Billing Department. We also engage in environmental protection by appropriately operating their environmental management system. In addition to setting and managing environmental targets as KPIs in line with our business operations, we have expressed our support for COOLCHOICE\*, soliciting and selecting activities from all members, and proactively engaging in environmental protection activities that can be easily undertaken by everyone in the department, such as recycling pull tabs and participating in the Chiyoda ward local cleanup campaigns, candle night events, and Kodomo Mirai (Children's Future) used book donations.

\*The Ministry of the Environment's national campaign to combat global warming.



For more information, see: Acquiring ISO 14001 Certification.

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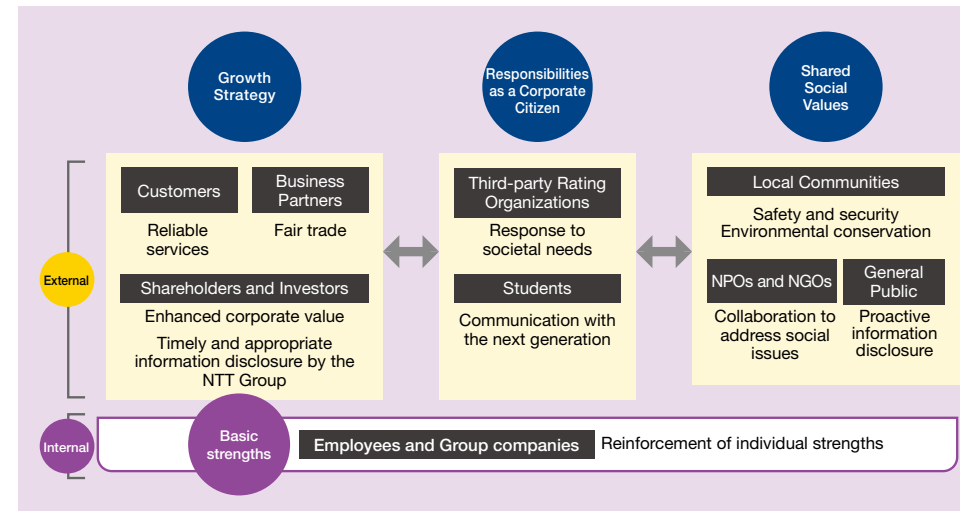


Enhance Stakeholder Engagement

Our Approach to Stakeholder Engagement

Building and enhancing stakeholder relationships are extremely important for the NTT Communications Group toward becoming a corporate group that creates the future and maintaining business operations. In a renewed effort to improve stakeholder engagement by disclosing information on sustainability, we have categorized our disclosure from the perspectives of required information, information that should be shared, and communication media. In addition to this report, we will engage with our stakeholders through our website, various events, and surveys.

[ NTT Communications Stakeholders ]





[ Dialogue with Stakeholders and Major Topics ]

Stakeholder	Opportunities for Engagement	Main Themes	
<b>Customers</b>	We gather feedback through such means as customer satisfaction (CS) surveys and take steps to improve satisfaction levels.	<ul style="list-style-type: none"> <li>Voice of customer (VOC) survey, CS surveys</li> <li>Exchange of opinions at the docomo business Forum</li> <li>Exchange of opinions based on daily interaction with customers</li> </ul>	<ul style="list-style-type: none"> <li>Improving quality in products and services</li> <li>Consideration of new products and services</li> <li>Continuous improvement in customer service</li> </ul>
<b>Business Partners</b>	We constantly exchange opinions to raise customer satisfaction and establish sustainability throughout the supply chain.	<ul style="list-style-type: none"> <li>Supplier due diligence</li> <li>Surveys, daily exchange of opinions</li> </ul>	<ul style="list-style-type: none"> <li>Improving quality in products and services</li> <li>Consideration and co-creation of new products and services</li> <li>Ensuring fair business practices</li> <li>Ensuring sustainable procurement and respect for human rights</li> </ul>
<b>Society at Large</b>	We create opportunities for engaging with diverse stakeholders in society to understand the issues and current status.	<ul style="list-style-type: none"> <li>Dialogue with stakeholders</li> <li>Exchange of opinions with NPOs, NGOs</li> <li>Social contribution activities</li> <li>Environmental protection activities</li> </ul>	<ul style="list-style-type: none"> <li>Contributing to the development of a sustainable society</li> <li>Participation in social contribution and community activities</li> <li>Harmony with local communities</li> <li>Responsibility as a corporate citizen</li> </ul>
<b>Employees</b>	We consistently incorporate employees' opinions to ensure effective employment and sustain employee motivation.	<ul style="list-style-type: none"> <li>Comments from executives during dialogue meetings and lectures</li> <li>e-learning programs and questionnaires</li> <li>Feedback collected through the corporate website and helpline</li> <li>KAIZEN Support Line</li> <li>Employee satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>Instilling the corporate vision and philosophy</li> <li>Instilling the Sustainability Policy</li> <li>Self-development and creation of customer value</li> <li>Realization of job satisfaction</li> <li>Autonomous career development and personal growth</li> </ul>
<b>Third-party Rating Organizations</b>	We meet the public need for information disclosure and cooperate with various surveys concerning the SDGs to develop a broad understanding of the status of our initiatives.	<ul style="list-style-type: none"> <li>Participation in surveys conducted by research institutions in Japan and overseas</li> <li>Publication of the Sustainability Report and information disclosure via the corporate website</li> </ul>	<ul style="list-style-type: none"> <li>The status of various initiatives for social issues, human resources, the environment, and corporate governance</li> </ul>



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● Ongoing Customer Satisfaction Surveys

In order to remain the service provider of choice for customers around the world, daily contact with customers cannot be limited to sales personnel. All employees consider customer interaction as a top priority and make every effort to increase customer satisfaction through innovative services and daily improvement efforts. One such initiative is the annual VOC survey on customer satisfaction. We take the comments seriously and are working diligently to make improvements.

Our fiscal 2022's VOC survey was conducted to understand customer trends and challenges in rebuilding local communities through the use of ICT (including carbon neutrality, Smart City, and digital transformation (DX) of education and local government), in addition to the level of overall satisfaction with NTT Communications as well as its service and sales activities. We conducted a detailed analysis of survey results by customer attribute to gain a more detailed understanding of customer needs in focused DX areas and security services, and we incorporated the learnings into service development.

Looking ahead, we will continue to pay close attention to what our customers have to say as we strive to make permanent improvements to ensure their satisfaction.

## Guidelines for Diverse Business Activities

Society has entrusted us with diverse responsibilities to fulfill through our operations, from developing products and services that address social issues to protecting the environment and fostering a corporate culture that respects fairness and diversity. We encourage strict adherence to various guidelines in our corporate activities in order to continue fulfilling our social mission in each of the Priority Areas defined under our Sustainability Policy.

[ Examples of Policies and Guidelines for Sustainability Priority Areas and Priority Activities ]

Sustainability Priority Areas and Priority Activities		Policies and Guidelines	Page in Report
Society	Promotion of DX to connect society with the future Promotion of innovations that break through limits	Our Mission	006 035 039
	ICT transformation	NTT Communications Three Disaster Policy Fundamentals	041
	Promotion of corporate citizenship	Social Action Principles	045
	Environment	Promotion of a decarbonized society Development of a closed-loop society	Global Environmental Charter
Environmental Statement			049
Eco Strategy 2030			050
Biodiversity Action Plan			070
Human Resources	Promotion of diversity and inclusion Respect for human rights	Promotion of Diversity Fundamental Policy	091
		Basic Policy on Human Rights Education	102
Governance	Thorough compliance and risk management Enhanced value chain partnerships Continuously strengthening information security	Basic Approach for Maintaining an Internal Control System	113
		NTT Communications Corporation Guidelines for Sustainability in Supply Chain	114
		NTT Communications Security Declaration	120

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Priority Activities

## Continuously Strengthening Information Security

### Our Approach

To address information security issues that are growing in sophistication and severity due to social trends for realizing a remote world, we are continuously promoting our security governance and strengthening our cyber security measures. We are conducting information security audits and implementing cyber security measures in accordance with the ISO/IEC 27001 international standard for information security management systems to reinforce its governance across the NTT Communications Group. As ICT professionals, we will also focus on establishing environments that prevent the occurrence of personal information leakage by developing human resources capable of maintaining a seamless framework across information and operational technologies.

### Main Achievements in Fiscal 2022 and Goals for the Coming Years

We are continuously strengthening our information security, including reinforcing our ongoing security management and appropriately managing personal information.

In fiscal 2022, we achieved our goal of zero serious incidents, and we will continue to strengthen our efforts to maintain this level of success.

In addition, we revised and enforced our information security rules in January 2023 to comply with NTT Group regulations and global standard security policies. In fiscal 2023, we will establish operations based on the revised rules. We will also reinforce our ability to respond to security risks by automating and streamlining security operations and improve IT governance by centralizing IT/OT asset management.

### Priority Activities Continuously Strengthening Information Security

#### Ensuring Information Security

##### ● Basic Policy

“The NTT Communications Security Declaration has been our basic policy for conducting business based on our belief that adhering to strict security management standards will lead to improving security and delivering benefit to our customers.”

#### NTT Communications Security Declaration

At NTT Communications, we believe that our most important mission is to provide our customers with services which they can use with the assurance that their critical information is being protected and to contribute to improving the security of our customers. We view security as the single most important issue to be addressed in providing services, and we pledge to work together with our customers to provide the best in security for their needs. To achieve this end, we do our utmost to ensure security throughout all aspects of the value chain, from the development of technologies and services to the construction and operation of systems. As ICT professionals, all of us at NTT Communications are committed to improving our capabilities to respond to security issues.

##### Three Resolutions

1. We regard security as our top priority in providing services to our customers, and we will do our utmost to enhance their security.
2. As an ICT solution partner entrusted with our customers' vital information, we will work with them at all times to ensure their security.
3. Business partners and contract employees are also important supporting members of NTT Communications. We will therefore collectively strive to ensure our own security.

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**Appropriate Management of Personal Information**

**Protection of Customer Information and Personal Information**

We protect customer personal information in compliance with the relevant laws and regulations as well as guidelines published by the Ministry of Internal Affairs and Communications, operating under an effective system of information management to stringently implement our Personal Information Management Rules, which define the basic elements of protecting customer information and personal data. When subcontracting the handling of customer personal information, we select subcontractors that meet the required standards.

We have been operating since 2002 under the ISMS certification\*1, which is primarily for our corporate sales and maintenance divisions, and since 2004 under the PrivacyMark certification\*2. In response to the revised Personal Information Protection Law that came into effect in April 2022, we have revised our internal regulations to strengthen our operations, including lifecycle management of customer information. With regard to raising employee awareness, we are taking actions such as conducting annual training sessions for all directors, employees, and partner employees. With regard to GDPR, we had been operating under the EU Customer Personal Information Management Guidelines, which stipulate the handling of personal information in the EU. In addition, in fiscal 2022, we took the opportunity of becoming a member of the

new DOCOMO Group to introduce the Privacy Impact Assessment System (PIA System) to ensure appropriate use of personal data based on the Behavioral Principles of the NTT DOCOMO Personal Data Charter. We will continue to protect customer privacy and promote the appropriate use of data so they can use our services without concern.

\*1 A screening and certification system for assessing whether an information security management system conforms to JIS Q 27001 (ISO/IEC 27001) standards.  
 \*2 A registered trademark granted for use by companies that have been certified by the Japan Information Processing Development Corporation as having established a system for appropriately protecting personal information in compliance with Japanese Industrial Standard JIS Q 15001 requirements for personal information management systems.

For more information on our policy concerning the handling of personal information, see: <https://www.ntt.com/en/about-us/hp/privacy.html>

For more information on the NTT DOCOMO Personal Data Charter, see: [https://www.docomo.ne.jp/english/utility/personal\\_data/charter/](https://www.docomo.ne.jp/english/utility/personal_data/charter/)

**Raising Workplace Awareness and Providing Thorough Training**

We have consistently pursued our initiatives by positioning “Continuously strengthening information security” as a key item in the Priority Area of “Governance” under our Sustainability Policy and by designating it as a main initiative. These encompass a wide range of activities such as strengthening the reliability of our information handling processes, obtaining and maintaining ISMS certification, and conducting security surveys. We proactively provide training for employees in order to raise workplace awareness as a critical responsibility for an ICT enterprise.

[ Information Security Training Attendance ]

Type of Training	FY2018	FY2019	FY2020	FY2021	FY2022
Information security training (total)	15,055	11,641	16,449	19,783	22,994
Companywide security training and assessment of understanding	14,941	11,527	16,291	19,588	22,819
Training for managers and leaders in charge of implementing security management	114	114	158	195	175





● Information Security Management Structure

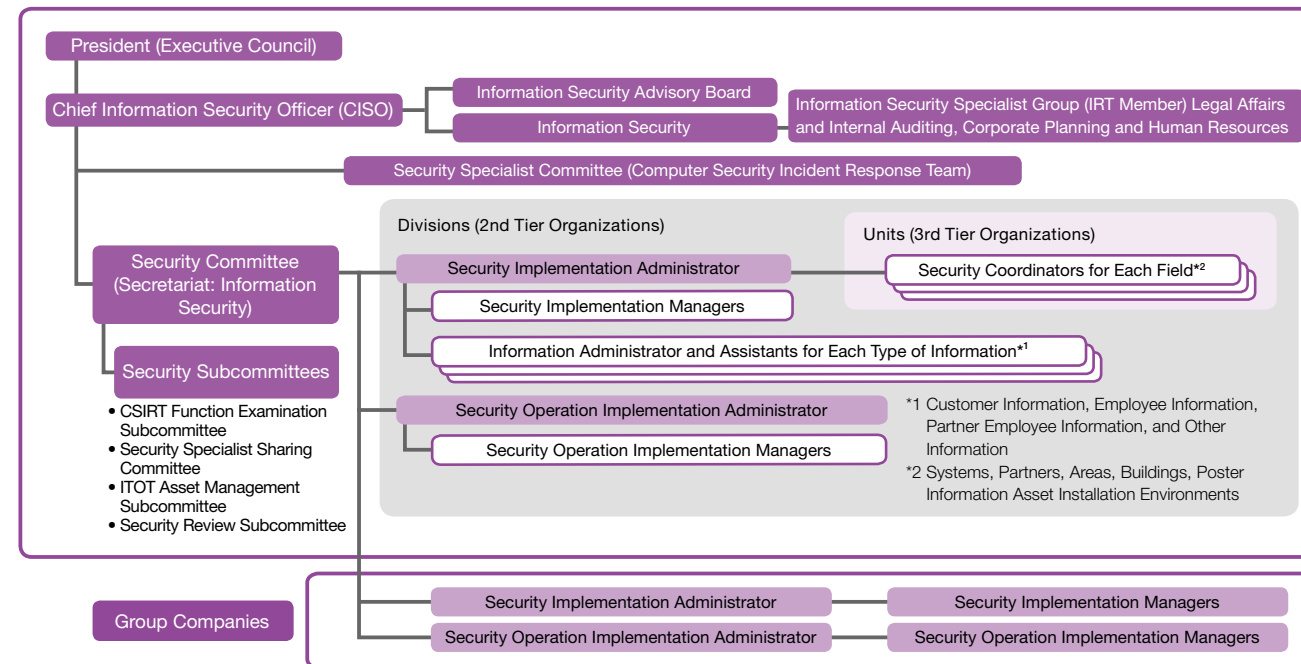
We set common targets on information security management for our operations in Japan and overseas, based on the requirements of ISO/IEC 27001. Specifically, we implement the following measures under the leadership of the chief information security officer (CISO): formulate rules and standards and educate all employees to raise their awareness, draw up and implement Companywide information security policies, monitor compliance with information security regulations and take any necessary corrective action, and ensure a unified response to information security incidents.

In fiscal 2023, we will apply the lessons learned from the unauthorized access incident and leverage our experience in international sporting events to develop comprehensive IT/OT security, security measures that lie at the foundation of the DOCOMO Group's business, and related actions that contribute to the country and society.

We will also establish evidence-based information security investigations and improve the efficiency of our security operations by automating the alert/incident response.

In terms of developing security specialists, we achieved the objectives of our plan for developing advanced security specialists by jointly operating a remote training program with N.F. Laboratories, Inc.

[ Security Management Framework ]



● Third-party Assessment and Certifications

As of March 2023, eight companies in Japan have obtained external ISMS certification for their information security management systems.

Eight companies that primarily handle personal information entrusted by customers have obtained PrivacyMark accreditation in recognition of their systems for protecting personal information.