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

Targeted SDGs



Priority Activities

➤ 112 Thorough Compliance and Risk Management

➤ 121 Enhanced Value Chain Partnerships

➤ 126 Continuously Strengthening Information Security





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Priority Activities

Thorough Compliance and Risk Management

Our Approach

Under the NTT Group Corporate Ethics Policy, NTT DOCOMO BUSINESS 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 strive to enhance compliance across the NTT DOCOMO BUSINESS Group by developing our compliance promotion framework centered on the Compliance Committee, 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 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 2024 and Goals for the Coming Years

As part of our ongoing compliance efforts, we conduct annual compliance training. Attendance for the NTT DOCOMO Business Group as a whole rose to 99.6% in fiscal 2024 from 99.4% in fiscal 2023, while the implementation rate for the corporate ethics survey conducted throughout the Group rose to 97.4% from 97.2% in fiscal 2023. In addition, we held workshops for employees to reflect on integrity, dialogue sessions between management and employees on compliance and integrity, and training to promote understanding of harassment and management for managers, project leaders, and others 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.

We are also striving Companywide to continuously enhance our risk management system. In fiscal 2024, we designated five material risks and implemented initiatives accordingly: changes in the geopolitical environment, occurrence of catastrophic disasters, maximizing synergies within the NTT DOCOMO Group, impact of internal fraud on management, and sound AI implementation in business. Regarding changes in the geopolitical environment, we addressed developments such as legislation related to economic security and responded to shifts in international conditions resulting from transitions in national governments. With regard to the occurrence of catastrophic disasters, we

strengthened disaster countermeasures by incorporating lessons learned from the Noto Peninsula Earthquake and conducted preparedness drills for potential disasters, including a Tokyo inland earthquake and Nankai Trough earthquake. As for maximizing synergies within the NTT DOCOMO Group, we promoted the resolution of challenges under a centralized management framework to ensure the full realization of Groupwide synergies. To address the impact of internal fraud on management, we reinforced awareness activities to ensure thorough implementation of basic compliance practices such as adherence to contractual obligations. For sound AI implementation in business, we developed an AI governance framework and promoted the revision of basic policies and regulations as well as the restructuring of AI risk checks and assessments.

In fiscal 2025, we identified material risks in the areas of geopolitics, service quality, information security, and compliance, and we will focus on addressing these. At the same time, we will strengthen initiatives to prevent the occurrence and recurrence of risks while further enhancing the effectiveness of risk management.

In addition, in fiscal 2024, we began conducting a fundamental review of our risk management processes from the perspectives of strengthening strategic risk response, enhancing visibility and real-time monitoring, and promoting collaboration with adjacent domains. We also began developing a dedicated platform that is scheduled for implementation in the latter half of fiscal 2025.



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With regard to compliance, under the Global Compliance Regulations, NTT DOCOMO BUSINESS has 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 enhancement across the NTT DOCOMO BUSINESS 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.

As for risk management, in accordance with the Risk Management Rules, we have established the Business Risk Management Committee, chaired by the senior executive president, to develop systems and mechanisms that enable us to effectively respond to risks. Each risk item, including material risks, is handled through a monthly Business Risk Management Subcommittee and regular exchanges of opinions with Group companies to implement a practical PDCA cycle for risk management by examining and analyzing the occurrence of risks and discussing 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.

Furthermore, in June 2024 we assigned a chief risk officer (CRO), who is ultimately responsible for risk management, to address risk responses and crisis

management with tighter integration across organizational boundaries.

Risk Management

Under the leadership of the Business Risk Management Committee, we annually determine risks, and we conduct an ongoing review and revision of response policies as business risks countermeasures, in light of changes in our surrounding business environment. We focus on the current status of internal and external risks as well as their impact and scope to identify risk items, and we make assessments according to their assumed frequency of occurrence and impact to determine material risks.

Strategy

Under the NTT Group Corporate Ethics Policy, in order to deal with increasingly complex compliance issues in Japan and overseas, NTT DOCOMO BUSINESS 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 regard integrity as one of the NTT Group's abiding values and have been working to establish a compliance infrastructure with solid integrity. As society becomes increasingly complex and diverse, and has broadened the range of standards we must meet, we believe it is ever more important for each employee to act with autonomy and a sound moral compass,

supported by strong connections with their teams and the Company, and to consistently pursue ethical behavior both individually and organizationally while maintaining trusted relationships with stakeholders. With the Company name and organizational changes in July 2025, we place even greater emphasis on integrity management as a core principle of our business.

In the ever-evolving business environment, we are working to manage risks to contribute to the sustainable growth of the NTT DOCOMO Group by appropriately addressing uncertain risk factors that may hinder the achievement of our business vision and business goals. By constantly monitoring risk status and combining the medium-term cycle (selecting and assessing material risks, formulating response policies, and so forth) with the short-term cycle (taking timely action for each risk), we are preparing for potential risks and addressing those that have materialized.

KPIs and Targets

We have set KPIs for three main initiatives. The KPI for sharing high ethical standards and ensuring compliance is zero serious compliance violations, while the KPI for corporate culture for maintaining and improving business ethics is 97% of employees responding that their workplaces have an open atmosphere, and the KPI for continuously upgrading the risk management structure is promoting Companywide risk management.

P.022 For more information on KPIs, see KPIs, Targets, and Outcome of Activities in this report.



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Sharing High Ethical Standards and Ensuring Compliance

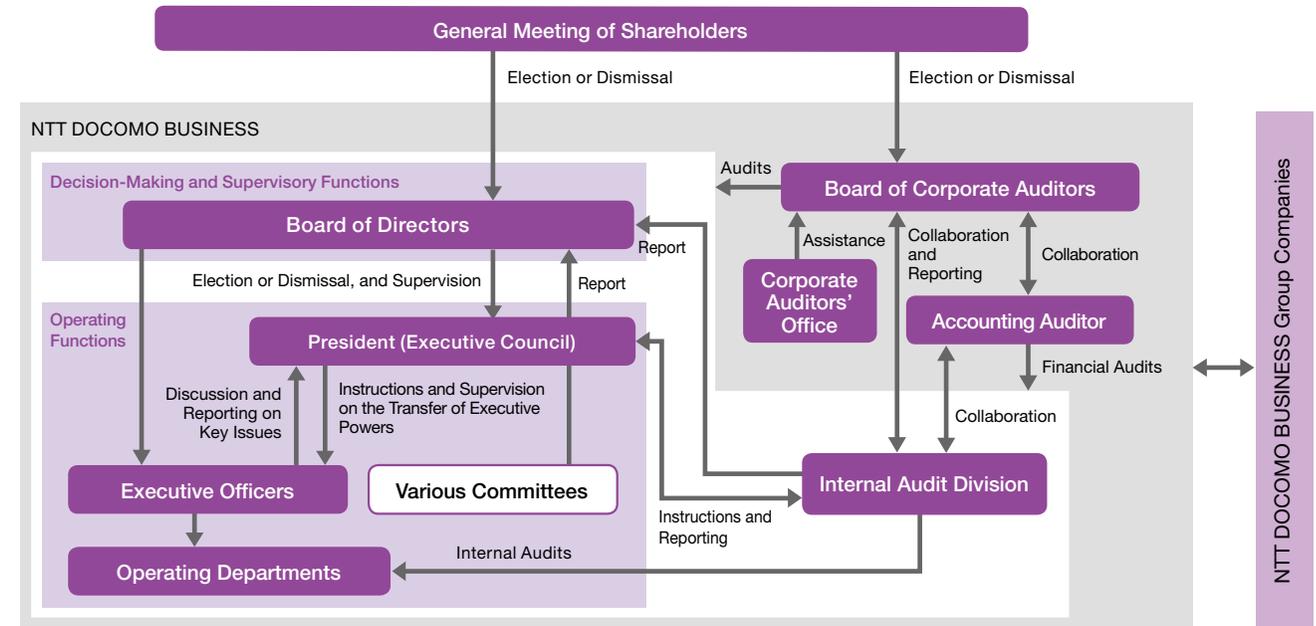
Corporate Governance

▶ Corporate Governance

NTT DOCOMO BUSINESS has adopted a governance structure based on a system of Board of Directors and Board of Corporate Auditors and has assigned outside directors to bolster its governance functions. The board is chaired by the president and in principle 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 Division 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. In addition to attending important meetings such as those of the Board of Directors, three auditors 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 Division by periodically sharing information on audit plans and results.

[Corporate Governance Structure]



[Composition of Board Directors and Auditors (as of June 11, 2025)]

Main Item	Content
Chairman of the Board of Directors	Concurrently held by the president
Number of directors (including outside directors)	9 (2)
Number of auditors (including outside auditors)	3 (2)
Number of executive officers (including female officers)	26 (5)
Term of office of directors	2 years
Term of office of auditors	4 years



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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 11, 2025)]

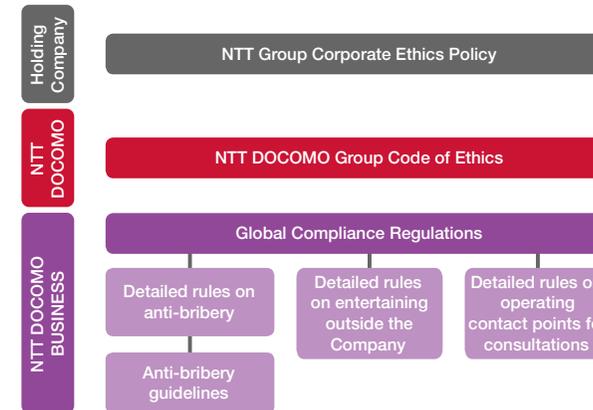
Position(s) and Organizational Responsibilities	Name
President, Representative Member of the Board of the Company, Chief Executive Officer	Katsushige Kojima
Senior Executive Vice President Representative Member of the Board of the Company, in charge of Corporate & Group Management, Head of Platform Service Division and Chief Risk Officer	Toshio Kanai
Senior Executive Vice President Representative Member of the Board of the Company, in charge of sales and of Global Business and Chief Customer Experience Officer	Akiko Kudo
Senior Executive Vice President Representative Member of the Board of the Company, in charge of Technology and Innovation, Senior Vice President of the Innovation Center, Chief Technology Officer, Chief Information Officer, Chief Information Security Officer, and Chief AI Officer	Hiraku Otsuchi
Senior Vice President Member of the Board, Head of Corporate Planning	Shinya Okuzawa
Members of the Board	Masaaki Shintaku
	Ikuko Suzuki
	Kaoru Asakura
	Junko Hiraishi
	Shuji Ota
Audit & Supervisory Board Members	Masanori Ozawa
	Haruka Saito

Continuously Enhancing Compliance Activities as a Company Consistently Trusted by Society

Compliance Promotion Framework

The NTT DOCOMO BUSINESS Group acts in accordance with the NTT Group Corporate Ethics Policy, established by NTT Inc. 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. We maintain the relevant rules under the Global Compliance Regulations that serve as the standard compliance policy for the NTT DOCOMO BUSINESS Group.

[Compliance Promotion Framework]

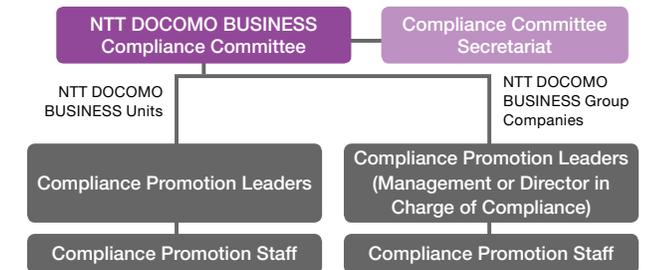


We also promote compliance led by the Compliance Committee, which is chaired by a senior executive vice president and supervises compliance promotion leaders

and staff assigned to each unit and Group company.

The Compliance Committee, consisting of compliance promotion leaders (heads of each unit) of NTT DOCOMO BUSINESS and presidents of each Group company, 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 DOCOMO BUSINESS.

[Compliance Promotion Framework]



Looking ahead, even as we respond to regulatory changes in Japan and overseas and the evolving business environment, management and all NTT DOCOMO BUSINESS 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/sustainability/governance/corporate-ethics/>



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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 DOCOMO BUSINESS 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 2024, we covered basic themes related to compliance with laws, Company rules, and social norms, such as ensuring fair competition, prohibiting bribery and excessive hospitality, preventing harassment, managing information appropriately, promoting sound data utilization, protecting personal information, and strengthening supply chain management. We also addressed topics such as contract compliance and points to consider when using generative AI. Attendance for the NTT DOCOMO BUSINESS Group as a whole was 99.6%.

In fiscal 2025, we are continuing training on themes that address changes in the business environment, such as integrity and compliance with contracts. 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 DOCOMO BUSINESS Inc. 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 DOCOMO BUSINESS adheres to the Anti-Bribery Handbook compiled by its parent company NTT Inc., 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. 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 we 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.

Furthermore, we continue to ensure fairness in operating our business by reviewing the rules on entertaining outside the Company, which were established to prevent conduct that may raise doubts about the fairness of our operations when interacting with public officials and

private-sector entities, and in order to maintain the trust of our stakeholders in light of changes in the external environment.

Anti-Competitive Behavior

NTT DOCOMO BUSINESS complies with fair competition laws and regulations, such as the Antimonopoly Act, to maintain a fair competitive environment in its business activities. We specifically provide training and awareness-raising programs for employees engaged in sales activities for public organizations, covering bid-rigging, bidding practices that impair fairness, bribery, and other points to consider in public sales activities. Continuing our awareness-raising activities will draw greater attention to competition laws within the Company as we contribute to promoting fair and free market competition.

Appropriate Advertising

Telecommunication services for smartphones and Internet use 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.

In this context, NTT DOCOMO BUSINESS will create new value by proposing integrated solutions combining mobile, security, and managed services. We 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



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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-understand manner. To this end, NTT DOCOMO BUSINESS has 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 response to changes in the business environment.

Initiatives on AI Ethics

With the advancement of generative AI and the emergence of autonomous AI, AI technologies are rapidly permeating a wide range of industries. While these remarkable technological developments offer numerous benefits, they also pose potential risks, including ethical concerns such as discrimination and bias, legal issues such as copyright infringement, and other challenges such as information leakage. In response, countries around the world, including members of the EU, are accelerating discussions on AI regulation and ethics while advancing the development of related legal frameworks.

In October 2024, the NTT DOCOMO BUSINESS Group restructured its AI governance framework and appointed AI risk management officers at each Group company. This structure enables the development and implementation of internal rules, the evaluation of AI-related risks during AI use, the handling of incidents related to AI ethics, the promotion of education and awareness on AI risk management, and

the monitoring and reporting of implementation status. NTT DOCOMO BUSINESS has also revised its internal regulations and guidelines in accordance with the NTT Group AI Charter and the NTT Group AI Governance Policy while enhancing its AI risk assessment capabilities. Specifically, we have incorporated AI risk checks into governance review processes for service development, project management systems, and IT systems development. We assess the AI technologies and products to be used, identify potential risk scenarios and control measures, and conduct risk assessments from perspectives such as information security, protection of personal data and privacy, and prevention of intellectual property infringement. Furthermore, the Generative AI Usage Guidelines, established in July 2023 and revised in November 2024, outline our AI governance framework and AI risk assessment processes. The guidelines also explain risks, countermeasures, and key considerations for each role, including model developers, service providers, and users, and support employees in gaining a deeper understanding of and effectively using generative AI.



For more information on the NTT Group AI Charter, see: <https://group.ntt/en/group/ai/charter.html>

Consultation Hotline

The NTT Group has established a common contact point for all Group companies for consultation and reporting with a reception by a law firm. The NTT DOCOMO BUSINESS 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 2024, a total of 122* incidents related to the NTT DOCOMO BUSINESS Group (72 related to harassment, 26 to dissatisfaction in the workplace, and 13 to labor) were reported through the channels described above. Working with the Compliance Office, the Human Rights Awareness Office, and the compliance promotion officers of the relevant organizations and Group companies, we responded appropriately to the reports based on the judgment of the chairperson of the Compliance Committee. We also investigated the facts and obtained third-party expert opinions as required, prior to implementing the necessary actions to prevent recurrence.

Given the many shared backgrounds and root causes of consultations on compliance and human rights, NTT DOCOMO BUSINESS will integrate these two functions as part of its organizational restructuring in July 2025. This integration is intended to accelerate investigations and improve the quality of responses. We have also been widely making announcements about the reporting and consultation desk through our website and training programs while 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 in the report. Reporting and consultation are available in Japanese and English and accessible to employees both in and outside of Japan. In addition, we are constantly striving to improve our hotline so that it is easier to access for reporting and consultation.

* The total number does not match the number of reports because some reports contain multiple issues.



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

Corporate Culture for Maintaining and Improving Business Ethics

The NTT DOCOMO BUSINESS 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 2024, the ratio of employees responding that their workplaces have an open atmosphere was 98.1% (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.

* The survey questions and response options have been revised since fiscal 2023 to reflect the standardized format adopted across the NTT Group.

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. Starting in fiscal 2025, we have been reporting our risk management policy to the Executive Management Meeting and the Board of Directors, thereby strengthening the promotion of risk management at the management level.

To address a range of risks, including material risks, we convene a monthly Risk Management Subcommittee composed of all organizational units. This committee examines the occurrence and analysis of risk events and discusses countermeasures. The status of risk countermeasures implemented by each organization is verified through operational audits, and similar initiatives are carried out at major Group companies, thereby promoting risk management across the entire 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 Response Headquarters and other units, 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 DOCOMO BUSINESS initiatives against disaster, see: <https://www.ntt.com/about-us/cs/saitai.html> (in Japanese only)



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Responding to Geopolitical and Economic Security Risks

Against the backdrop of globalization shaped by the postwar international order entering a period transition, driven in part by changes in political leadership across countries, the impact of global developments, particularly U.S. policy and U.S.-China relations, on corporate activities is expected to become more pronounced. In this context, we are taking actions to handle geopolitical and economic security threats as part of our business risk management, with an emphasis on comprehensive and effective efforts across the entire Group.

Specifically, we have adopted the basic stance of ensuring both employee safety and business continuity, and we are identifying issues that need to be addressed, discussing policies to address them, and developing and managing a lead organization and promotion system along with their implementation schedule for each issue.

Moreover, we are responding to the amended regulations on specific user information in the Telecommunications Business Act (effective June 2023) and to our designation as a specified social infrastructure operator in the telecommunications field (in November 2023) based on the system for ensuring the stable provision of specified social infrastructure services under the Act on the Promotion of Ensuring National Security through Integrated Implementation of Economic Measures. We are also preparing for the handling of critical economic security information in anticipation of the introduction of the security clearance system under the Act on the Protection and Utilization of Critical Economic Security Information, which came into force in May 2025.

In fiscal 2025, we are strengthening our organizational framework by establishing a cross-functional team led by the Legal & Risk Management Department, with members drawn

from relevant divisions, and further accelerating our response to geopolitical and economic security risks.

Internal Controls

In accordance with the new Companies Act, enacted in May 2006 and revised in May 2015, NTT DOCOMO BUSINESS 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 DOCOMO BUSINESS takes a variety of measures to prevent and minimize loss.
2. NTT DOCOMO BUSINESS has established the Internal Audit Division to maintain and assess effectiveness with regard to operational status of the above system of internal controls. As a monitoring organization, it 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 Inc. The necessary improvements are made following assessments of system effectiveness.
3. NTT DOCOMO BUSINESS 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 DOCOMO BUSINESS, Internal Audit Division 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 DOCOMO BUSINESS Group.

In fiscal 2024, we implemented a range of initiatives, including internal audits to address risks identified by the Business Risk Management Promotion Committee and other bodies, the advancement and streamlining of audits through digital auditing, and continuous risk monitoring through the detection of signs of inadequacy and fraud using CAAT*. Each organization inside NTT DOCOMO BUSINESS conducts self-risk management activities, and continuous risk monitoring is positioned as part of these efforts. To support centralized risk identification and operational efficiency within each organization, the Internal Audit Division provides and promotes the use of a web portal that enables organizations to comprehensively visualize key risk indicators within their own operations. To further strengthen Group governance, we also conducted audits of regional offices selected based on risk, as well as of domestic and overseas Group companies of NTT DOCOMO BUSINESS.

As part of our efforts to improve the quality of internal audits, we underwent an external evaluation of the Internal Audit Division's organization and activities to assess



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its conformity with the International Standards for the Professional Practice of Internal Auditing, established by The Institute of Internal Auditors. Although the evaluation results showed improvement compared to the previous assessment in fiscal 2018, we will continue to pursue further quality enhancement by incorporating leading practices from both within and outside the NTT Group.

Also looking ahead, to contribute to the reduction of management risks and the effective achievement of management objectives across the NTT DOCOMO BUSINESS Group, we will continue to take timely and appropriate approaches to all types of risks and achieve strategic, efficient, and high-quality audits by leveraging digital technologies and data. Through these efforts, we will strengthen governance and contribute to medium- to long-term sustainable business growth and the maximization of corporate value.

* 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 DOCOMO BUSINESS Group suppliers to ensure a reliable procurement system for our customers. To that end, we established NTT DOCOMO BUSINESS Inc. 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.

[NTT Group 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 DOCOMO BUSINESS Inc. Guidelines for Sustainability in Supply Chain] ★ Indicates the main additions and enhanced item

Content

Introduction ★

Requests to Suppliers (Code of Conduct): Common Matters

1. Build management systems ★
2. Detect inappropriate activities early by building complaint processing mechanisms
3. Publicize and disclose the status of initiatives related to these guidelines

I. Human Rights and Labor

1. Prohibit forced labor ★
2. Prohibit inhumane treatment
3. Prohibit child labor and make considerations for young workers
4. Prohibit discrimination ★
5. Proper wages and allowances
6. Regulate working hours
7. Respect the right to freedom of association and collective bargaining
8. Implement human rights due diligence in the supply chain ★
9. Promotion of "Technology that is based on high ethical standards."

II. Occupational Health and Safety

1. Occupational Safety

2. Apply safety measures for equipment and instruments
3. Promote hygiene in the workplace
4. Apply appropriate measures for occupational injuries and illnesses ★
5. Prepare for and respond to emergencies
6. Consider physical workload
7. Promote safety and hygiene in company facilities
8. Conduct health maintenance programs for employees
9. Communicate about safety and hygiene

III. Environment

1. Obtain environmental permits and report to the government
2. Manage chemical substances contained in products
3. Manage chemical substances
4. Minimize environmental pollution (wastewater, sludge, exhaust, noise, vibration, etc.)
5. Reduce energy consumption and greenhouse gas emissions ★
6. Reduce environmental burden by implementing product assessment
7. Effectively use resources and manage waste
8. Conserve biodiversity ★
9. Implement environmental investigations in the supply chain

IV. Fair Trade & Ethics

1. Prevent corruption and illegal political contributions, prohibit improperly providing or receiving benefits
2. Prohibit abuse of dominant bargaining position
3. Execute business fairly
4. Respect intellectual property
5. Appropriately manage imports and exports
6. Prevent improper acts
7. Responsibly procure minerals and carry out due diligence

V. Product Quality and Safety Product Quality and Safety

1. Ensure product safety
2. Provide accurate product and service information

VI. Information Security

1. Provide products and services that take into consideration security and privacy ★
2. Prevent the leaking of confidential information
3. Protect personal information
4. Take countermeasures against cyber attacks on one's own company
5. Respond to security incidents ★

VII. Formulate business continuity plans



For more information on the NTT DOCOMO BUSINESS Inc. Guidelines for Sustainability in Supply Chain, see:

https://www.ntt.com/content/dam/nttcom/hq/en/about-us/procurement/pdf/SustainabilityGuidelines_E_202507_1.pdf



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Main Achievements in Fiscal 2024 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*, a global rating organization. In fiscal 2023, we introduced the collaborative self-risk assessment questionnaire (SAQ) for sustainable procurement, in collaboration with three telecommunications companies (NTT, KDDI, SoftBank) to identify a variety of risks. We are also strengthening our engagement with suppliers through conducting direct dialogues with those identified as requiring improvement based on the evaluation results.

In fiscal 2025, 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

customer satisfaction surveys as our main measure for continuously improving customer satisfaction. In the voice of customer (VOC) survey, the process enables us to respond to survey results by identifying priority issues from the customer perspective and quickly improving these issues, which we continue to do.

Since fiscal 2024, we have assigned a chief customer experience officer (CCXO) to strengthen our system for improving customer experience (CX) across the entire Company and strive to provide value that will further satisfy our customers.

* 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 and human rights, ethics, and sustainable procurement.

Risks and Opportunities

We are taking initiatives in procurement with the understanding that environmental issues, such as climate change, as well as social change present both business risks and opportunities.

We regard rising greenhouse gas emissions is an environmental risk. As climate change is recognized as an important global issue, the NTT DOCOMO BUSINESS Group has set a goal of achieving net-zero by fiscal 2040 (Scopes 1, 2, and 3). To this end, we confirm compliance with the Supply Chain Sustainability Promotion Guidelines before entering into any contract. Furthermore, since September 2022, we have introduced the use of ICP, and from January 2025 we have been expanding its scope of application. In addition, we are engaging in direct dialogues with key suppliers to support the reduction of greenhouse gas emissions.

In terms of social risks, we believe that the occurrence of human rights violations such as forced labor and child labor, as well as the introduction of new laws and regulations or their strengthening, could increase our cost burden and affect the business performance and financial position of the NTT Group as a whole.

As for opportunities, by requesting suppliers to comply with our guidelines we can encourage them to reduce their greenhouse gas emissions, which will lead to reductions in our greenhouse gas emissions and in turn enhance our corporate value through ESG management.

We recognize that realizing a sustainable society depends upon collaborating with suppliers as well as our own efforts. We will therefore continue to improve the evaluation and understanding of our stakeholders,



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including investors, through direct discussions with our suppliers and disclosing information about the processes and results of these talks.

Collaboration with Suppliers to Ensure Sustainability Procurement and Green Procurement

Dissemination of Sustainable and Green Procurement

We have formulated the NTT DOCOMO BUSINESS 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 also include sustainability compliance items established by our company, 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, NTT DOCOMO BUSINESS conducts SAQs using EcoVadis.

We have set the target of achieving a 100% rate of direct dialogue with suppliers identified as requiring improvement based on their SAQ responses, and we have accomplished this goal. In the course of developing mutual understanding and trust, we engage in exchanges of views aimed at improving initiatives from the perspectives of 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.



For more information on the NTT DOCOMO BUSINESS Inc. Guidelines for Sustainability in Supply Chain, see: https://www.ntt.com/content/dam/nttcom/hq/en/about-us/procurement/pdf/SustainabilityGuidelines_E_202507_1.pdf



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

Developing Procurement Professionals

In maintaining sound management throughout the NTT DOCOMO BUSINESS Group, we uphold our Sustainability Policy to thoroughly establish and enhance our awareness of sustainability through efforts that also involve suppliers. In the Procurement & Billing Department, which is responsible for procurement operations, 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 June 2025, the cumulative number of certified employees is 88 (Grade A: 36, Grade B: 52). Looking ahead, we will continue nurturing human resources in each area to practice sustainable and responsible procurement.

Moreover, we have been certified under ISO 14001 since 1999 and remain committed to the effective operation and maintenance of our environmental management system, and core employees are required to complete ISO 14001 internal auditor training. Through these efforts, we promote

environmental protection activities aimed at realizing an environmentally friendly society.



For more information, see: Acquiring ISO 14001 Certification in this report.

UK Modern Slavery Act Statement

The NTT DOCOMO BUSINESS 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 the 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 cooperate with suppliers to prevent slave labor and human trafficking, and to promote and strengthen our activities based on the Guiding Principles on Business and Human Rights.



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



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Response to Conflict Minerals

The NTT DOCOMO BUSINESS Group will promote initiatives to refrain from using conflict minerals under the NTT DOCOMO BUSINESS Inc. 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 DOCOMO BUSINESS Inc. 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. As a result, we received a Bronze rating in 2025. 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.

Enhance Stakeholder Engagement

Our Approach to Stakeholder Engagement

Building and enhancing stakeholder relationships are extremely important for the NTT DOCOMO BUSINESS Group toward becoming a corporate group that creates the future and maintaining business operations. In addition to this report, we will continue to engage with stakeholders through our website, various events, and surveys, taking into account our relationships with each stakeholder and the issues they face.

[Dialogue with Stakeholders and Major Topics]

Stakeholder	Opportunities for Engagement	Main Themes	
Customers	<ul style="list-style-type: none"> We gather feedback through such means as customer satisfaction (CS) surveys and take steps to improve satisfaction levels. 	<ul style="list-style-type: none"> Voice of customer (VOC) survey, CS surveys Exchange of opinions at the docomo business Forum Exchange of opinions based on daily interaction with customers 	<ul style="list-style-type: none"> Improving quality in products and services Consideration of new products and services Continuous improvement in customer service
Business Partners	<ul style="list-style-type: none"> We constantly exchange opinions to raise customer satisfaction and establish sustainability throughout the supply chain. 	<ul style="list-style-type: none"> Supplier survey Daily exchange of opinions and surveys 	<ul style="list-style-type: none"> Improving quality in products and services Consideration and co-creation of new products and services Ensuring fair business practices Ensuring sustainable procurement and respect for human rights
Society at Large	<ul style="list-style-type: none"> We create opportunities for engaging with diverse stakeholders in society to understand the issues and current status. 	<ul style="list-style-type: none"> Dialogue with stakeholders Exchange of opinions with NPOs, NGOs Social contribution activities Environmental protection activities 	<ul style="list-style-type: none"> Contributing to the development of a sustainable society Participation in social contribution and community activities Harmony with local communities Responsibility as a corporate citizen
Employees	<ul style="list-style-type: none"> We consistently incorporate employees' opinions to ensure effective employment and sustain employee motivation. 	<ul style="list-style-type: none"> Comments from executives during dialogue meetings and lectures e-learning programs and questionnaires Feedback collected through the corporate website and helpline Employee satisfaction surveys 	<ul style="list-style-type: none"> Instilling the corporate vision and philosophy and personal growth Instilling the Sustainability Policy Self-development and creation of customer value Realization of job satisfaction Autonomous career development



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► Initiatives to Improve CX

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 very seriously and are working diligently to make improvements.

In our fiscal 2024 VOC survey, in addition to assessing the level of overall satisfaction with NTT DOCOMO BUSINESS and satisfaction with its services and sales activities, we also examined the implementation status and required support regarding areas of high customer interest, such as generative AI. We conducted a detailed analysis of survey results by customer attribute to gain a more detailed understanding of customer needs, and we incorporated the learnings into proposal activities and service development.

Looking ahead, we will continue to 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	004 034
	ICT transformation	NTT DOCOMO BUSINESS Three Disaster Policy Fundamentals	036
	Promotion of corporate citizenship	Social Action Principles	041
Environment	Promotion of a decarbonized society Development of a closed-loop society	Global Environmental Charter	045
		NTT DOCOMO BUSINESS Environmental Statement	045
		New Environmental Goals	045
		Biodiversity Action Plan	071
Human Resources	Promotion of diversity, equity, and inclusion Respect for human rights	Promotion of Diversity Fundamental Policy	095
		Basic Policy on Human Rights Education	106
Governance	Thorough compliance and risk management Enhanced value chain partnerships Continuously strengthening information security	Basic Approach for Maintaining an Internal Control System	119
		NTT DOCOMO BUSINESS Inc. Guidelines for Sustainability in Supply Chain	121
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Our Approach

We are committed to continuously strengthening cybersecurity measures and promoting security governance to enhance the cyber resilience of our ICT infrastructure and ensure information security, including the protection of customer personal information, in response to societal change, advancements in digitalization, and the increasing sophistication and severity of security threats such as cyberattacks.

By adhering to the ISO/IEC 27001 international standard for information security management systems, we conduct information security audits and implement comprehensive cybersecurity measures. We also focus on training our employees as ICT professionals and developing security specialists.

The NTT DOCOMO BUSINESS Group, responsible for the corporate business of the NTT DOCOMO Group, has positioned compliance and security as critical to the business of NTT DOCOMO BUSINESS and is dedicated to enhancing its capacity to effectively respond to security risks.

Main Achievements in Fiscal 2024 and Goals for the Coming Years

The NTT DOCOMO BUSINESS Group has set a goal of zero serious incidents. In fiscal 2024 as well, we achieved our goal by promoting the introduction of security tools such as Endpoint Detection and Response (EDR) and Network Detection and Response (NDR), automating and streamlining security operations, improving IT governance by centralizing IT/OT asset management, and conducting security checks on systems that handle important information such as customers' personal information. However, as reported in the news release dated March 5, 2025, unauthorized access* to our systems occurred in fiscal 2024.

In light of this, we will further strengthen measures in fiscal 2025 toward achieving our goal of zero serious incidents.

* In early February 2025, we discovered that our facilities had been subject to unauthorized access and confirmed the possibility that some information may have been leaked externally. Specifically, part of the information related to corporate customer services stored in our internal Order Information Distribution System, which manages and distributes data on service activations and changes, may have been exposed. No information related to individual customer services was affected. Initial response measures, including blocking access to the affected equipment, have already been implemented. Telecommunications services have not been suspended as a result of this incident.

Governance

The NTT DOCOMO BUSINESS Group established the Security Committee, chaired by the chief information security officer (CISO), to ensure information security governance. The committee examines information security measures, formulates and reviews related regulations, and conducts activities by department and Groupwide.

Risk Management

The NTT DOCOMO BUSINESS Group conducts risk management both at the organizational level and at the individual system level.

At the organizational level, the CISO and the senior vice president of the Information Security Division assess cross-sectional risks throughout the entire organization and in accordance with business characteristics and formulate action plans based on the priority of measures, thereby ensuring their efficient implementation.

At the system level, we conduct risk assessments and implement information security measures for each in-house system used and managed by the Company and Group companies, and conduct risk management in line with the system development lifecycle.



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Strategy

The NTT DOCOMO BUSINESS Group is committed to security that contributes to the business of our customers and partners as well as to the country and society on the whole.

Policy for Initiatives

- Security policies and measures are formulated based on information security considerations in accordance with related standards, such as ISO and NIST documents.
- As a security-by-design approach, information security measures are never treated as afterthoughts; they are considered at every stage of the system development lifecycle. A shift left approach is adopted to consider and incorporate security measures from an upstream perspective, such as the design stage of business processes and systems. In this way, we utilize basic information security measures that correspond to the concepts of zero trust security and multilayer defense, as well as an increasingly pervasive cloud environment.
- Information security measures are designed to balance risks and information security measures according to business objectives, with consideration for usability that does not impose excessive burdens on end users and operation managers. The measures are also designed with an emphasis on mobility in response to the recent demand for remote work environment, supporting productivity and employee challenges to boost security as the driving force.

Representative Initiatives

In accordance with this policy, we are building and monitoring an IT/security environment to prevent the leakage of critical information to NTT DOCOMO BUSINESS Group companies, suppliers, and other supply chain companies. We have also established a support system within the Information Security Division to promote these initiatives.

To strengthen the overall organizational capabilities of the information security line, we will further promote DX (automation, efficiency, and sophistication) in security operations and expand our cyberattack prevention initiatives.

Metrics and Targets

The NTT Group has set a common goal of zero serious security incidents. To achieve this, NTT DOCOMO BUSINESS sets and monitors internal KPIs such as the number of incidents and the status of response to external threats (e.g., blocking malicious emails, addressing OS/application vulnerabilities) and reports monthly to management.

P.023 For more information, see: **KPIs, Targets, and Outcome of Activities in this report.**

Continuously Strengthening Security Management

Ensuring Information Security

Basic Policy

NTT DOCOMO BUSINESS regards raising security awareness in the workplace, including among all executives, employees, and partner employees, as a crucial responsibility of an ICT company. The NTT DOCOMO BUSINESS 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 DOCOMO BUSINESS Security Declaration

At NTT DOCOMO BUSINESS, 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 DOCOMO BUSINESS 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 DOCOMO BUSINESS. We will therefore collectively strive to ensure our own security.



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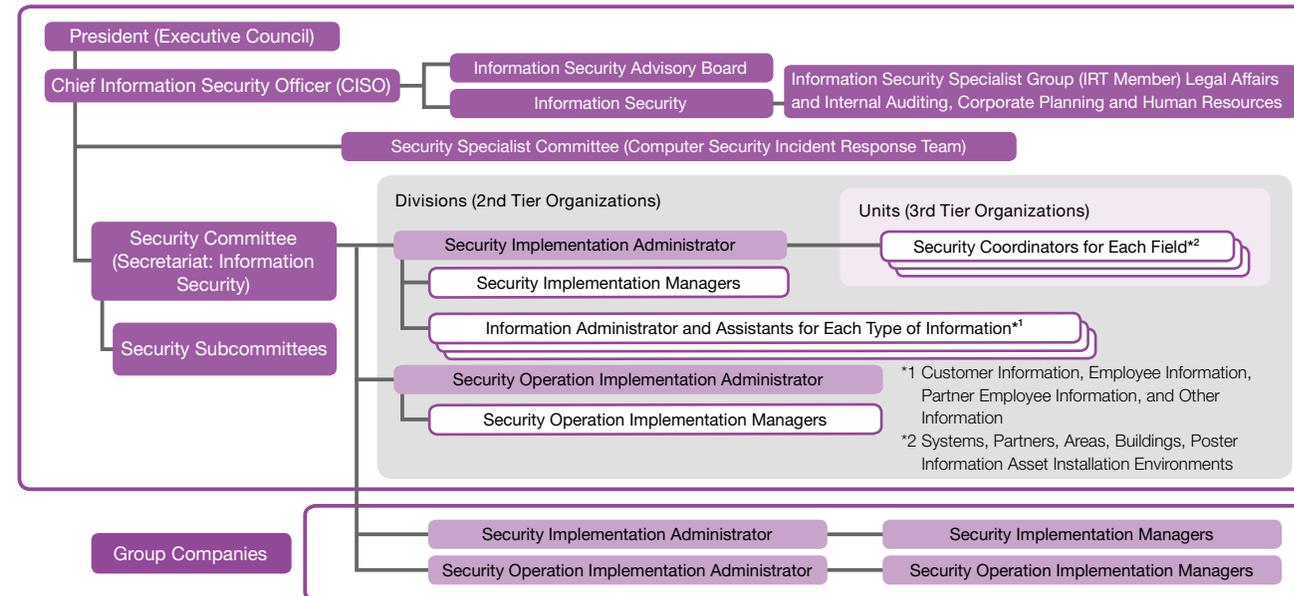
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Information Security Governance Structure

The NTT DOCOMO BUSINESS Group has established a system for ensuring information security governance by appointing a CISO and assigning a security management officer to each company and organization, and defining their roles, responsibilities, and functions. We implement the following measures under the leadership of the 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.

We have established the Security Committee, which has been expanding activities across the entire Group, including determining security measures based on regulations, formulating and reviewing regulations to improve service quality, reviewing business processes, sharing information on vulnerabilities, and taking emergency action to prevent unauthorized access, and responding should it occur. In fiscal 2024, we established a support framework for NTT DOCOMO BUSINESS Group companies and began promoting security measures tailored to the business characteristics of each company, rolling out initiatives such as menu offerings, and responding to inquiries.

[Security Management Framework]



Information Security Risk Assessment and Management Process

The NTT DOCOMO BUSINESS Group maintains many systems that handle important and highly confidential information, such as customer information, and therefore conducts risk management both at the organizational level and the individual system level.

For risk management at the organizational level, the CISO and the senior vice president of the Information Security Division assess cross-sectional, information security risks throughout the entire organization and in accordance with business characteristics, and formulate action plans based on the priority of measures, thereby ensuring their efficient implementation. We conduct the risk assessments at least once a year to identify gaps against targets, determine risk response criteria, and formulate and implement response plans.

For risk management at the system level, we conduct risk assessments and implement information security measures for each in-house system used and managed by the Company and our Group companies. We also conduct risk management in line with the system development lifecycle.



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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. As of March 2025, ten Group companies in Japan have been operating under the ISMS certification and six companies that mainly handle customers' personal information have been operating under the PrivacyMark certification.

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. To raise employee awareness, we are taking such actions as conducting annual training sessions for all directors, employees, and partner employees. With regard to GDPR, a regulation on personal data protection within the EU, 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/

▶ Raising Workplace Awareness and Providing Thorough Training

We are actively working to ensure that employees understand our information security policies and the appropriate handling of information and to raise awareness of compliance and security against internal fraud. To this end, we provide Companywide training in information security and handling targeted attack emails as well as for security managers and staff.

In fiscal 2024, in light of recent security trends, we

conducted ransomware attack drills for the organizational heads and security personnel of each division. We also carried out practical exercises for both management and operational staff.

We intend to further improve the security awareness and literacy of every employee through training and information dissemination that incorporate internal and external trends and case studies.

[Information Security Training Attendance]

Type of Training	FY2020	FY2021	FY2022	FY2023	FY2024
Information security training (total)	16,449	19,783	22,994	23,611	25,185
Companywide security training and assessment of understanding	16,291	19,588	22,819	23,611	24,899
Training for managers and leaders in charge of implementing security management	158	195	175	-*	286

*Jointly held in FY2024