

NTT Communications Modern Slavery Statement (April 2016 - March 2017)

This statement is published by NTT Communications Corporation (“NTT Communications”) in accordance with section 54 of the Modern Slavery Act 2015. This statement sets out the actions NTT Communications has taken during the 2016 financial year to ensure that slavery and human trafficking are not taking place in our business operations or in our supply chain.

1. Our business and supply chains

- NTT Communications and its group companies provide a wide range of global information and communications technology (ICT) solutions including cloud, network and security services. We are headquartered in Tokyo, Japan, and have offices in over 110 cities in more than 40 countries/regions. We are a wholly owned subsidiary of Nippon Telegraph and Telephone Corporation (NTT).
- NTT Europe Limited, our wholly-owned subsidiary, has published a separate statement in compliance with the Modern Slavery Act 2015 (see [NTT Europe’s Modern Slavery Statement](#)).
- Through a business relationship with suppliers all over the world based on good faith and sustainability, we procure high quality services and products in an effective and timely manner, and, together with our suppliers, avoid forced labour and human trafficking in our supply chain.

2. Policies related to slavery and human trafficking

- Based on the [NTT Group’s Human Rights Charter](#), which includes the need to prevent forced labour and human trafficking, we have the [NTT Communications Basic Policy on Human Rights Education](#) in place and are promoting human rights education as a globally operated company.
- We have also established the NTT Communications Group Global Compliance Rules to strengthen corporate ethics. Based on the Rules, we have engaged in various measures to establish corporate ethics, including developing an organisational structure for compliance promotion, implementation of corporate ethics education for employees, and establishment of a corporate ethics help line.
- On the basis of the [NTT Communications Group’s Fundamental CSR Policy](#), we ensure high ethical standards and awareness of human rights in our work.
- The [NTT Communications’ Basic Policy on Procurement](#) includes the need for ‘compliance with laws, regulations and social norms’, ‘protecting the environment’ and ‘respecting human rights’. Based on this Basic Policy, to clarify our expectations and strengthen relationships of trust with our suppliers, we have the [NTT Communications Guideline for CSR in the Supply Chain](#) in place. These Guidelines include the need to prevent forced labour and child labour, and to manage wages and working times.
- We report our activities based on these policies, rules and guidelines annually in our [CSR report](#).

3. Our due diligence processes and activities to prevent forced labour and human trafficking

i. Organisational and management structure

- We have established the Human Rights Education Promotion Committee and the Compliance Committee that are responsible for raising awareness of human rights and corporate ethics, which enables us to deal appropriately with reported issues on forced labour and human trafficking.

ii. Communications on policies and guidelines

- We conduct annual surveys for officers, employees or temporary staff (“Employees”) of our group companies regarding human rights and harassment at work, and their awareness of corporate ethics.
- Within our supply chain, we select eleven (11) major suppliers every year and conduct surveys to understand the extent our suppliers meet the expectations in the NTT Communications Guideline for CSR in the Supply Chain. The prevention of forced labour and human trafficking are included as questionnaire items.

iii. Reporting contact point

- We have established reporting contact points for Employees of our group companies, and accept any concerns and reports on violations of human rights and corporate ethics. Additionally, NTT has established a Group-wide Corporate Ethics Help Line. This Help Line is open to any external stakeholders including but not limited to our suppliers or business partners.

iv. Training to raise awareness on human rights and compliance

- We implement annual training programs regarding human rights and compliance for Employees of our group companies in Japan, to raise awareness on and deepen understanding of human rights and compliance. We also provide seminars for staff at various levels.

4. Plans to strengthen our approach in the future

- We will conduct a human rights impact assessment to identify potential human rights risks and impacts in our business and supply chains, and aim to take appropriate steps to ensure that there is no slave labour or human trafficking in our business and supply chain.
- We will deepen the collaboration with our suppliers to deal with any issues in our supply chain.

This statement was approved and signed by:



Tetsuya Shoji

President and CEO

NTT Communications Corporation

29th September , 2017