

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Effective 2 December 2024

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For the Financial Years Ending 31 March 2025 and 31 March 2026

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps NTT DATA Business Solutions Limited has taken to ensure that slavery and human trafficking are not taking place in our business or supply chains.

1. Introduction

NTT DATA Business Solutions Limited is committed to acting ethically and with integrity in all our business dealings. We recognise our responsibility to prevent modern slavery and human trafficking within our organisation and supply chains and to play an active role in upholding human rights.

2. Our Business and Structure

We are a leading IT and business consulting services provider in the UK, employing approximately 700 people. As part of the global NTT DATA group, we deliver innovative solutions that empower businesses across industries. Our operations include consulting, implementation, managed services, support, software development and resale of third-party software.

3. Our Supply Chains

Our supply chains include providers of IT equipment, software, professional services, and facilities management. These suppliers are predominantly based in the UK and Europe, with well-established regulatory and ethical standards, but we remain vigilant about potential risks.

4. Policies and Governance

We have implemented policies to promote transparency and accountability, including:

- **Code of Conduct:** Outlining our commitment to ethical business practices.
- **Supplier Code of Conduct:** Requiring suppliers to adhere to our standards on labour rights, including the prohibition of forced labour and human trafficking.
- **Whistleblowing Policy:** Encouraging employees and partners to report concerns confidentially.

5. Due Diligence Processes

We conduct due diligence to assess and mitigate risks of modern slavery:

- Evaluating potential suppliers against ethical criteria.

- Requiring contracts to include compliance with anti-slavery laws.
- Regularly reviewing our supply chain to identify high-risk areas.

6. Risk Assessment and Management

While the risk of modern slavery in our direct operations is low, we recognise that risks may exist deeper in our supply chain. We prioritise high-risk categories and regions for additional scrutiny.

7. Training and Awareness

We provide training to our employees to help them understand modern slavery risks and how to identify and report potential issues. Key personnel in procurement and human resources receive specialised training.

8. Measuring Effectiveness

To monitor the effectiveness of our efforts, we:

- Track compliance with our Supplier Code of Conduct.
- Review and investigate any reported concerns or incidents.
- Regularly update our policies and practices in line with evolving standards.

9. Future Steps

We are committed to continuous improvement and will:

- Enhance supplier audits and engagement.
- Collaborate with industry initiatives to combat modern slavery.
- Expand training programs to ensure wider awareness.

Board Approval

This statement has been approved by the Board of Directors of NTT DATA Business Solutions Limited and will be reviewed annually.