


This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Modern Slavery and Human Trafficking Statement for the financial year ending 31st March 2023

Approved by the Board on 19<sup>th</sup> December 2023, and signed by NTT Finance UK Director,  
**Mariko Doi**

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**Mariko Doi, Director**

**19<sup>th</sup> December 2023**

### **About NTT Finance UK Limited**

NTT Finance UK Limited is a wholly owned subsidiary of NTT Finance Corporation. NTT Finance Corporation is part of the NTT Group, a leading, global technology services company headquartered in Tokyo. Further details on the NTT Group can be found at <https://group.ntt/en/ir/library/annual/>. Our Mission is to provide comprehensive financial support to promote the advancement of NTT Group businesses.

### **Our Values and Commitments**

At NTT Finance UK Limited, we are fully committed to attaining the highest standards of ethical conduct and integrity in all our business activities, including preventing slavery and human trafficking throughout our organisation and in our supply chain.

### **Our Policies on Modern Slavery and Human Trafficking**

NTT Finance UK Limited expects all our employees to work in accordance with business values and principles outlined in NTT Finance Corporation Code of Business Conduct and other internal policies and training resources. NTT Finance Corporation Code of Business Conduct and all other applicable policies are readily available to all NTT Finance UK Limited employees on our Intranet.

NTT Finance UK Limited has adopted the following NTT Group policies for identifying and seeking to prevent modern slavery and human trafficking in its operations and supply chains:

- **NTT Group Global Sustainability Charter:** This sets out the responsibility to respect all human rights, including those of our customers, stakeholders, and our entire business value chain.

- **NTT Group Human Rights Policy:** This sets out our commitment to respect and protect human rights, in accordance with UN Universal Declaration of Human Rights and with the UN Guiding Principles on Business and Human Rights. The Global Human Rights Policy prohibits all forms of forced and compulsory labour, human trafficking, and child labour, and highlights our commitment to correct or eradicate labour practices that violate human rights.
- **NTT Group Corporate Ethics Policy:** The aim is to encourage openness and we ask our employees, and third parties, to report any knowledge or suspicion of slavery or human trafficking using the "Corporate Ethics Helpline". NTT Finance UK Limited operates a strict non retaliation policy and will not, in any way, retaliate against a whistleblower acting in good faith.
- **Procurement Policies:** This seeks to realize 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.
- **NTT Group Guidelines for Sustainability in Supply Chain:** The NTT Group has published the "NTT Group Guidelines for Sustainability in Supply Chain" to promote initiatives aimed at achieving a sustainable society in the supply chain. The NTT Group also conducts supplier engagement activities to ensure that all suppliers in the supply chain comply with this guideline. This guideline prohibits forced labor, child labor and regulates working hours.

### **Our Supply Chain**

Our supply chains provide us with goods and services. NTT Finance UK Limited strives to ensure that our supply chains operate in an honest, fair, and transparent manner. Together with our suppliers, we are acting and striving to address various social issues related to human rights, labour environment, and corrupt practices that may occur within our supply chain. All suppliers, sub-contractors, and business partners we engage must agree to our position on human rights and commit to not using any form of forced labour. They must comply with the NTT Group Guidelines for Sustainability in Supply Chain, all applicable modern slavery laws and regulations, and have adequate controls in place to ensure that they are not exposed to or complicit in human trafficking and modern slavery. To date, we have not been made aware of, through our "Corporate Ethics Helpline" or otherwise, any complaints or allegations of human trafficking or slavery activities against any of our suppliers. Should NTT Finance UK Limited become aware of an incident of modern slavery or human trafficking within its supply chain, NTT Finance UK Limited will work with the relevant supplier to implement swift remedial actions.

### **Risk assessment and Management**

NTT Finance UK Limited recognizes the challenges around modern slavery in complex global supply chains, and we are fully committed to understanding and minimizing the risks of modern slavery associated with goods and services we purchase.

NTT Finance UK Limited has a zero-tolerance approach to modern slavery and human trafficking, and all forms of corruption and bribery associated with these criminal acts. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and adequate controls aimed at preventing any form of modern slavery within our business and our supply chain.

As a financial company, our ongoing assessment indicates that the risk of modern slavery or human trafficking occurring within our business is low, when compared to other industries. We are committed to continuously improving our risk assessment process to ensure we are in a position to timely identify and remediate any modern slavery concerns that could be connected to both our business and supply chain.

Our objective is to operate an effective supply chain governance framework which minimizes the risk of slavery and human trafficking within our supply chains. NTT Finance UK Limited will ensure that we do not knowingly participate in any activity that involves any form of modern slavery or enter into business with any organisation which knowingly supports or is found to be involved in slavery, forced or compulsory labour, or human trafficking.

NTT Finance UK Limited also incorporated the terms requiring compliance with all applicable laws, rules and regulations including those related to modern slavery and human trafficking in our standard contracts. We would regard any confirmed instance of modern slavery or human trafficking as a breach of contract and reserve the right to take appropriate action, including the ability to terminate such contracts immediately.

### **Training and Awareness**

We have implemented mandatory employees training to raise awareness on human rights and compliance every year.