



Respect for Human Rights

Relevant GRI Standards: 102-16/103-2/412-1

Policies and Concepts

As a corporate group to keep growing globally, the NTT Group recognizes that respecting human rights is an important social responsibility of companies. Under this recognition, we believe that we must strengthen respect for human rights, and our human rights management, toward all people involved in the NTT Group's value chain. We established the NTT Group's Human Rights Charter in 2014 to express this principle. This charter clearly defines the human rights to be respected as internationally recognized human rights, and we take the rights stipulated under the Universal Declaration of Human Rights and the International Bill of Human Rights, and under the eight core principles of the ILO Declaration of Fundamental Principles and Rights at Work, to be the minimum standards that require compliance. As a method of managing respect for human rights, we have adopted the approaches of the United Nations' Guiding Principles on Business and Human Rights and ISO 26000. Furthermore, we have separately laid out Basic Policies on Human Rights based on the charter in the effort to solve various human rights issues.

The NTT Group's Human Rights Charter

We recognize that the respect for human rights is a corporate responsibility and aim to create a safe, secure and rich social environment by fulfilling its responsibility.

1. We*¹ respect internationally recognized human rights,*² including the Universal Declaration of Human Rights in all company activities.
2. We responsibly respect for human rights by efforts to reduce any negative impacts on human rights holders. We respond appropriately when negative impacts on human rights occur.
3. We aim to not be complicit in infringing human rights, including being involved in discrimination, directly or indirectly.
4. When negative impacts on human rights are done by a business partner and are linked to a product or service of the NTT Group, we will expect them to respect human rights and not to infringe on them.

*1 "We" means the NTT Group and its officers and employees.

*2 "Internationally recognized human rights" are rights included in declarations and rules that form the basis for international standards of universal human rights throughout the world and specifically refer to the following.

United Nations (the Universal Declaration of Human Rights and the two Covenants on human rights)

- The Universal Declaration of Human Rights (adopted by the United Nations General Assembly in 1948)
- International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights (adopted by the United Nations General Assembly in 1966, in force from 1976)

International Labour Organization (eight basic principles of the Core Conventions of the ILO Declaration)

- The eight core principles of the ILO Declaration on Fundamental Principles and Rights at Work (adopted at the 86th International Labour Conference in 1998) are: Forced Labour, Freedom of Association and Protection of the Right to Organize, Right to Organize and Collective Bargaining, Equal Remuneration, Abolition of Forced Labour, Discrimination (Employment and Occupation), Minimum Age Convention, and Elimination of the Worst Forms of Child Labour..

Note: In carrying out articles 2 through 4 above, we apply UN Guiding Principles on Business and Human Rights and ISO 26000 and are subject to the procedures described therein.

Our Basic Policy on Human Rights

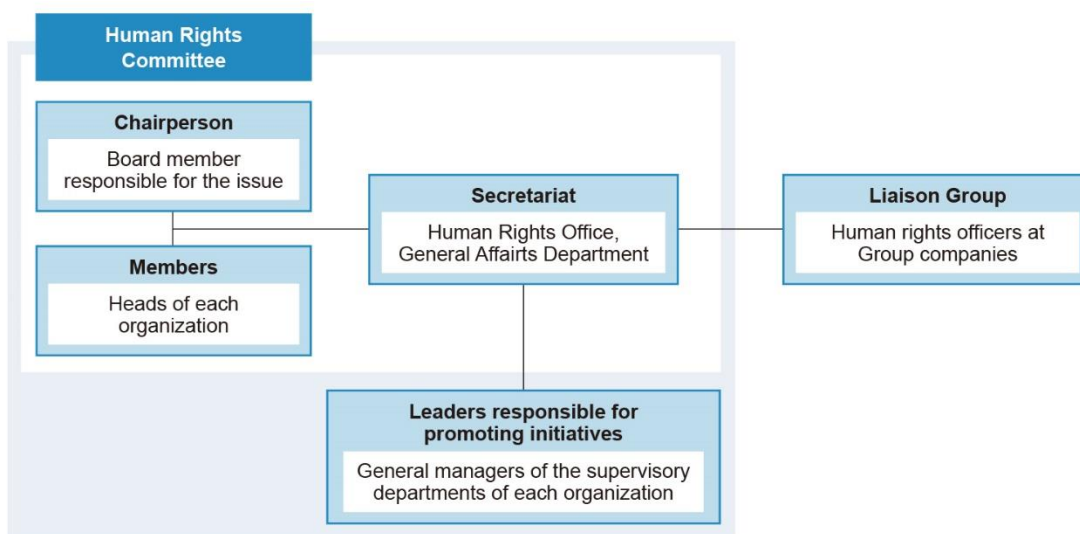
Nippon Telegraph and Telephone Corporation, hereunder NTT, believes that human rights is an important issue, and recognizes the fact that making efforts towards promotion of and respect towards human rights is a social responsibility that all companies should discharge. NTT aims to build up corporate culture that respects human rights in order to build a safe secure and enriched society.

1. The NTT management themselves take a lead in respecting human rights of all the stakeholders.
2. NTT will, through its business activities, strive for a solution on the Dowa issue and other human rights issues.
3. NTT respects diversity, promotes equal opportunity, and strives to create a healthy working environment that is free of harassment issues.
4. NTT will, and from the standpoint of respect to human rights, review its operation, as appropriate, and will adapt and improve these to its business activities.
5. NTT will, through its Human Rights Committee, initiate and execute employee-focused activities.
6. NTT is committed to supporting its Group companies in their efforts to raise awareness on human rights issues.

Organization for Implementation

We believe it is important for the entire NTT Group to instill an understanding of respect for human rights and undertake business activities with a full awareness of human rights. Accordingly, NTT has established the Human Rights Committee, headed by a senior executive vice president, under the Executive Officers Meeting. Through this framework, we are working

to heighten human rights awareness across the NTT Group and reinforce human rights management, including conducting human rights due diligence, training on human rights issues (training for officers including those at Group companies, training for all employees, etc.), and establishing and operating contact points for human rights.



Main Initiatives

Due Diligence

In 2014 we established “The NTT Group’s Human Rights Charter” based on international standards for human rights, such as the UN Guiding Principles on Business and Human Rights and ISO 26000. Based on the approach stipulated in this charter, we are introducing and implementing human rights due diligence processes in step with our global business development.

In fiscal 2015, we conducted a pre-assessment of specific businesses in overseas area that are important to the home market in order to identify human rights issues associated with those businesses. In our human rights management survey in fiscal 2016 covering all Group companies in Japan and overseas, and based on the Guiding Principles on Business and Human Rights, we checked up on their human rights policy, management systems and priority human rights issues. The results identified priority human rights issues for 250 of the 258 companies surveyed and indicated that 248 companies are working on specific initiatives to raise awareness about these human rights issues.

Since fiscal 2017, we have brought in external specialized institutions to implement risk assessments based on results obtained from in-house surveys. In fiscal 2017, a potential human rights impact assessment was carried out which assigned an evaluative score to the degree of negative impact of the NTT Group’s businesses on the human rights of stakeholders from the perspective of “the likelihood of future human rights risks in each country” and “severity of human rights risks arising in each business.” The results of this led to us identifying Asia as a priority area for tackling human rights issues and establishing 21 human rights indicators for ICT business.

In fiscal 2018, a manifest human rights impact assessment was carried out to verify the initiatives implemented in the previous fiscal year. After considering factors such as country risk for each country in Asia and impact on business, India was selected as the country to be assessed. Interviews were conducted with our local subsidiary and a local NGO that deals with human rights risk associated with specific business activities. The results of this confirmed there are currently no serious human rights issues that present a major risk to business operations. Meanwhile we identified priority issues out of the 21 human rights indicators mapped to be addressed in India in the future.

In fiscal 2019, we conducted a second human rights management survey following the first one in fiscal 2016 to confirm the management status of human rights contact points at each company and to set the NTT Group’s human rights priorities.



As a result, we identified “women’s rights,” “privacy rights,” “working hours,” “occupational health and safety” and “the right to organize and collective bargaining” as our top five issues and became aware of the urgent need to reconfigure management to address global human rights issues. We also held a stakeholder dialogue involving five experts from three overseas organizations (Verisk Maplecroft, World Benchmarking Alliance and Corporate Human Rights Benchmark) and one Japanese organization (Japan Research Institute) with the head of the Human Rights Office. And we received advice on the NTT Group’s overall human rights initiatives, human rights in the ICT industry, related challenges, information disclosure and Group-wide promotion of initiatives.

In fiscal 2020, we will seek expert opinion on examining the excesses and deficiencies in our initiatives and consider KPIs with regard to the five priority human rights issues identified during the previous year. We will also strengthen our global management system in response to overseas trends in regulations and areas where public expectations are high to appropriately manage the risks.

Stakeholder Dialogue

Reviewing Our Initiatives with Human Rights Experts

Outline

In October 2019, we invited four human rights specialists and experts from three overseas organizations and one Japanese organization to share their views on the NTT Group’s human rights initiatives. We received advice on the Group’s overall initiatives on human rights, human rights in the ICT industry, related challenges, information disclosure, and Group-wide promotion of initiatives.

Dialogue Participants

Human Rights Specialists and Experts	
Verisk Maplecroft	Mr. Gus MacFarlane
World Benchmarking Alliance	Ms. Pauliina Murphy
Corporate Human Rights Benchmark	Ms. Camille Le Pors
Japan Research Institute	Mr. Mitsuo Wakameda

Nippon Telegraph and Telephone Corporation: Head of the Human Rights Office, General Affairs Department, and five others

Caux Round Table Japan: Director and two others



During the dialogue, the participants exchanged views on a broad range of topics, including the need to address privacy and human rights issues, development of a grievance mechanism and incorporation into the management system, establishment of a human rights management system linked with overseas Group companies, and the need to disclose information on these initiatives. This was our first dialogue with experts on human rights. We renewed our awareness of the importance of promoting human rights initiatives by considering measures in response to this review and by continuously engaging in dialogue with stakeholders as we pursue these issues in the future.

Communicating Our Efforts

The NTT Group endeavors to broadly communicate its business and human rights initiatives. In fiscal 2019, we shared an overview of the business and human rights activities of the NTT Group at an international conference hosted by the Caux Round Table Japan. We also reported on the results of human rights due diligence and risk assessment conducted from 2017 to 2018 as well as on how these processes are being applied across Group companies. Moreover, we expressed our intention to continue assessing risks, bolster educational programs on business and human rights, and establish an effective management system. The conference was attended by 97 people from 54 companies and 8 organizations, including companies, NGOs, NPOs, and universities.

Group-wide Human Rights Training and Education Programs

To disseminate the concept of respecting human rights and basic human rights, and to instill an awareness of global standards on human rights, at key points in employees’ careers (joining the Company, receiving promotions, etc.), we provide training on human rights issues connected to business activities. In addition, for those in top management of Group companies or in other management positions, we offer programs that include lectures by outside experts on global trends in human rights. To foster awareness of human rights in employees, we issue invitations to employees and their families to submit human rights slogans, while the board member responsible for human rights issues delivers a message to mark Global Human Rights Day.

Since fiscal 2014, the NTT Group has worked to disseminate its Human Rights Charter by sharing the content of e-learning with Group companies in Japan and continuously carrying out educational activities during training for all employees

as well as on other occasions. In the training, we communicate the importance of respect for human rights and the significance of addressing the issue throughout the NTT Group.

Contact Point for Human Rights Issues

The NTT Group provides internal and external contact points that employees can consult on various concerns related to human rights. One of these, the Corporate Ethics Help Line, is an external consultation desk outsourced to a law firm that responds to consultation by third parties or by employees, on a confidential basis, for situations that cannot be reported internally. Consultations are accepted in various forms, including email, telephone and letter. All consultations are thoroughly kept confidential to protect the privacy of the person and ensure they are not subjected to disadvantageous treatment.

The contact point also handles consultations on compliance issues. Please see page 101 for details.

Incidents of Human Rights Violations and Corrective Actions

In an effort to ensure awareness and prevent recurrence, we have set up a Corporate Ethics Action Q&A section on our employee-oriented corporate website to explain nine representative examples of ethics violations. Each example action is described and laws and regulations that are the basis of reasoning are explained. When the NTT Group has taken disciplinary action related to human rights, we publish excerpts of the cases and expound the cases on the site to raise employee awareness and prevent recurrence by calling for their attention and organizing training and other educational opportunities.

Initiatives at Overseas Group Companies

Response to the UK Modern Slavery Act

NTT Group companies have published their statements in accordance with the Modern Slavery Act 2015 enacted in the United Kingdom.

- NTT Communications Modern Slavery Statement
https://www.ntt.com/content/dam/nttcom/hq/en/about-us/csr/modernslavery/statement_2019_en.pdf
- NTT DATA Group Sustainability Report 2019 (page 095)
https://www.nttdata.com/global/en/-/media/nttdataglobal/1_files/sustainability/sustainability-report/2019/sr_2019_p.pdf?la=en&hash=81D5CC4F5FBE67DAE141E4D8092760ED6DC8C730
- NTT Data UK Limited Modern Slavery Act
<https://uk.nttdata.com/Modern-Slavery-Act>

Introduction of B-BBEE

South Africa, where Dimension Data, a subsidiary of NTT, is headquartered, adopts the Broad-Based Black Economic Empowerment (B-BBEE) policy to enhance the status of people who had been disadvantaged by discriminatory treatment during the apartheid era. Under B-BBEE, which the Government of South Africa uses as an assessment standard, companies are rated on a scorecard for their level of contribution to ownership, management, employment equity, skills development, preferential procurement, enterprise development, and socio-economic development. As a result of its efforts in the areas of ownership, employment equity and skills development, Dimension Data was recognized as a Level 2 contributor, the second highest recognition in the eight level B-BBEE system, two ranks higher than the previous year.