

Anti-Bribery Handbook



Introduction

In November 2021, the NTT Group announced the “NTT Group Sustainability Charter.” To realize a sustainable society, the NTT Group has declared the aim of simultaneously achieving corporate *growth* and *resolving social issues* through the implementation of the IOWN concept, which is based on high ethical standards and cutting-edge technologies and innovation. The NTT Group Sustainability Charter sets out three themes: (1) ensuring the coexistence of nature and humanity, (2) improving prosperity for all people and cultures, (3) maximizing well-being for all, and at the core of second theme is establishing shared ethical standards and strengthening/ensuring compliance.

As the NTT Group’s corporate activities become increasingly global, this series of handbooks will serve as a useful tool for enabling individual employees to understand, as owners, important laws and regulations that NTT Group personnel around the world must all abide by.

The first handbook in the series is this Anti-Bribery Handbook. The Anti-Bribery Handbook is a revised version of one we produced in 2015 mainly for the purpose of deepening understanding of regulations concerning the bribing of foreign public officials. In 2021 it came to light that senior NTT Group executives had dined out with persons connected to Japanese ministries and agencies, and reflecting on these incidents, we enhanced the contents and altered the format such as increasing the number of explanations using case studies.

NTT Group employees need a solid understanding of the importance of preventing bribery and should at least read the parts of the handbook that relate to their own work. In addition, NTT Group companies should make use of the handbook to ensure that bribery is prevented and to raise compliance awareness. For example, they could use the case studies it contains to run training sessions.

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Chapter 1. Q&A

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Easy-to-understand explanations in a Q&A format

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This handbook has been prepared with an emphasis on readability and clarity, so that the outline of major anti-bribery laws and regulations can be easily understood. If you have any question or need clarification on this handbook, please consult with the relevant departments or personnel (e.g., compliance officer) at your company.



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