

NTT Group Corporate Ethics Charter

Code of Conduct [Explanation of Corporate Ethics Charter]

In accordance with the NTT Group Corporate Ethics Charter, all directors and employees of the NTT Group will take care of the following items

- **Prohibition of corruption and bribery**

Comply with corruption laws in each country and refrain from suspicious acts.

We do not offer or accept gifts, hospitality or other types of incentives that could affect a business decision. Even when the other party is not a public official, etc., but an individual or a company, We do not to directly or indirectly provide them with economic benefit with the intention of wrongfully soliciting business (even if the benefit is described as a charitable donation or sponsorship of an event). Specifically, it is based on a handbook prevention handbook.

[PDF](http://www.ntt.co.jp/csr_e/governance/pdf/anti_bribery_handbook.pdf) http://www.ntt.co.jp/csr_e/governance/pdf/anti_bribery_handbook.pdf

- **Prohibition of excessive donations and entertainment**

Carefully take care of laws and business practices in each country and strictly refrain from excessive donations and entertainment with good sense and moderation.

- **Prohibition of discrimination**

We will ban all discrimination and strive to improve human rights in and outside Japan.

Specifically, the NTT Group Human Rights Policy is based.

[WEB](http://www.ntt.co.jp/csr_e/communication/team-ntt/02.html) http://www.ntt.co.jp/csr_e/communication/team-ntt/02.html

- **Confidentiality of information**

Comply with national information protection regulations to protect confidential confidentiality of confidential information, including personal information and customer information.

Specifically, it is based on employee employment rules and the NTT Group Information Protection Policy.

[WEB](http://www.ntt.co.jp/kojinjo/e/index.html) <http://www.ntt.co.jp/kojinjo/e/index.html>

- **Response to Conflicts of Interest**

Attention is paid to conflicts of interest, and if there is a risk of conflicts of interest between personal interests and the company, we need to confer with corporate ethics division.

- **Prohibition of antitrust and anti-competitive practices**

Observe competition laws in each country and prohibit anti-competitive practices.

If there is a possibility that this Code is inconsistent with this Code, we need to confer with corporate ethics division.

- **Prevention of Money Laundering**

Compliance with the Money Laundering Act of each country and the Anti-Terrorism Act.

- **Prohibition of insider trading**

Compliance with laws and regulations on insider trading in each country

Do not sell shares using important insider information.

If it is unclear whether or not to fall under important insider information, he needs to confer with corporate ethics division.

- **Improving the environment, health, and safety**

Health management is indispensable for the development of corporate growth, and we are working on welfare. We will work to build a safe and comfortable workplace environment and suitable mechanisms to avoid workplace accidents, injuries or diseases associated with our work activity and the preventive management of workplace hazards.

- **Improving the effectiveness of internal reporting systems**

If the company finds irregularities and scandals in the company, and it is difficult to solve the problem on the line, it will use an internal reporting system that can be declared anonymously. Specifically, it is specified in the NTT Group internal and external operations regulations.

[WEB](http://www.ntt.co.jp/csr_e/governance/compliance.html) http://www.ntt.co.jp/csr_e/governance/compliance.html

- **Protecting environment**

We are committed to realize a sustainable society, protecting the nature and reducing any negative impact we might have on our surroundings.