

bee

A woman with reddish-brown hair is shown in profile, looking towards the right. She is interacting with a large, vertical digital screen that displays various data visualizations, including a tree-like structure and a circular gauge. The background is dark with a bokeh effect of light spots and two glowing, wireframe butterflies. The overall color palette is dominated by teal and blue tones.

Code of ethics and professional conduct of NTT DATA Spain Group

FUTURE
AT HEART

Preamble

As a consequence of the acquisition of NTT DATA Spain Group by NTT DATA Corporation, there is an alliance that leads to a globalization of the activities, service portfolio widening and larger international presence of the latter. Cooperation with NTT DATA Spain Group allows NTT DATA to reinforce their experience in the industrial sector industrial and to access not just big customers in Spain and several Latin-American countries, but also to multinational companies with presence in those markets.

Further to potential synergies with NTT DATA, NTT DATA Spain Group will also be able to work closely with NTT Group companies in order to enlarge global services provided to its customers.

Therefore, further to the principles in this Code, it will also be applicable at NTT DATA Spain Group principles in the table below which are part of NTT DATA Global Compliance Policy.

Section	Global Compliance Policy
<p>Preamble</p>	<p>To Be a Trusted Company Trust by customers, shareholders, suppliers and the societies is indispensable for a company to sustainably grow. A company can be trusted upon by being aware of its social responsibility (“CSR”) and by fulfilling the expectation of, and enhancing the satisfaction of, customers and other stakeholders through good dialogues. We also believe that it is fundamental to gain trust not only by complying with laws, regulations and agreements but also by respecting various international norms, including human rights, acting with good moral and integrity, and performing fair and transparent business activities. Furthermore, our mission is to create new “mechanisms” and “values” with IT and to materialize more affluent and harmonious societies, and we aim to resolve the issues that the earth and societies are facing. With these in mind, everyone at NTT DATA will act in accordance with this “Global Compliance Policy” and we all do our utmost to be a trusted company.</p>
<p>Application</p>	<p>All directors, officers and employees shall fully understand this Global Compliance Policy, and act as follows to achieve its purposes. Directors and officers shall take their initiatives and exert to cultivate the high morals in employees.</p>

<p>Principles</p>	<p>We will: - comply with all relevant laws and regulations of the jurisdictions where we do business, including international laws, and act in accordance with good integrity; and</p> <p>- be aware of our corporate social responsibility and perform fair and transparent business activities.</p>
<p>For Customers</p>	<p>We will:</p> <p>- execute appropriate agreements with our customers, and provide systems and services pursuant to the agreement; and</p> <p>- thoroughly manage customer information in accordance with the agreements, relevant laws and regulations related to the protection of personal data.</p>
<p>For Shareholders</p>	<p>We will:</p> <p>- undertake sound corporate management and strive to increase the interests of our shareholders; and</p> <p>- timely and appropriately disclose management information in order to perform transparent management.</p>
<p>To Competitors</p>	<p>We will:</p> <p>- restrict ourselves from performing any acts that would impede market competition, including defamation, dumping, cartels, and other unfair/anti-competitive conducts, and perform fair and free competition; and</p> <p>- protect our own intellectual properties and respect the same of others.</p>
<p>To Suppliers</p>	<p>We will:</p> <p>- act with integrity without abusing a superior position; and</p> <p>- comply with relevant laws and regulations applicable to transactions with suppliers and observe agreements with suppliers.</p>

<p>To Government</p>	<p>We will:</p> <ul style="list-style-type: none"> - not provide any gift or hospitality against our policy or applicable laws, nor conduct any act that would be suspected of corruption; and - not be involved in any bribery with government officials in any manner and in any jurisdiction.
<p>To Society</p>	<p>We will:</p> <ul style="list-style-type: none"> - actively undertake social contribution, such as volunteering or other community activities, to fulfill our responsibility as a good corporate citizen; - respect the diversity of cultures and values, and contribute to the development of societies where we do businesses; and - refuse to do any business with anti-social forces
<p>To Environment</p>	<p>We will:</p> <ul style="list-style-type: none"> - propose IT systems and solutions to contribute to the reduction of the environmental load; - strive to reduce the environmental load caused by our business operations; - increase our awareness of biodiversity, and undertake activities to protect the natural environment; and - observe laws and regulations related to the environment.
<p>To Employees & Co-workers</p>	<p>We will:</p> <ul style="list-style-type: none"> - respect the individuality and personality of our people; - respect human rights and will not discriminate based on gender, nationality, belief or religion; - not commit any harassment; and - maintain fair and equal treatment of employees and provide employment opportunities on the basis of individual merit, in a working environment safe, secure, and free of violence, drugs or child labor.

<p>As Employees</p>	<p>Each employee will:</p> <ul style="list-style-type: none"> - ensure that information security be maintained and not conduct any privacy infringement, unauthorized access and other unlawful acts; - observe the company policies and not engage in any act that conflicts with the interests of the company or that provides personal gain to the detriment of the company; - not engage in insider trading in any manner; - not provide or receive any gifts or hospitality against our policy from/to customers, suppliers or business partners; - not post to any social media any confidential or proprietary information or any message that harms the trust or rights of any parties; and - promptly report any breach or suspected breach of this policy or other unlawful act to your manager, local compliance officer, or whistle blowing line where appropriate. The company will not make any retaliation to those who made good faith reporting through the whistle line.
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Introduction

NTT DATA Spain Group understands that its success depends both on its technological capabilities and on the capability of its professionals to behave in accordance with principles of conduct based on the reference values that form its culture.

So that these principles are really operational, NTT DATA Spain Group has identified those specific attitudes and behaviors which should be observed in the daily activity of all its professionals as persons affected by the Scope of this Code.

NTT DATA Spain Group' Code of Professional Conduct sets down the company's attitude in terms of values, principles and standards, which have to govern our internal relations and relations with our environment, whilst it aims to be a means of transmission of the ethics framework and the corporate culture of all the areas and legal entities which form NTT DATA Spain Group.

As NTT DATA Spain Group professionals, we should not only know and respect this code of professional conduct, but also accept it and supervise its compliance.

Violation of the rules contained in this Code of Professional Conduct by persons affected by it shall be considered infringement thereof, and shall derive, according to the analysis of what has occurred, in the imposition of the corresponding sanction and/or corresponding legal actions by the competent control body.

In short, the NTT DATA Spain Group Code of Ethics and Professional Conduct is one of the instruments that reflects the attitude and culture that NTT DATA Spain Group has chosen to characterize its behavior in business and whose preservation is guaranteed through observing the patterns and conducts identified in this document.

Scope

The values, principles and standards that are part of this Code are applicable to all employees, officers, directors, partners, shareholders, participants and collaborators, consultants, agents, grantees and/or other subcontractors, always acting on behalf of or cooperating with NTT DATA Spain Group, and generally, those other persons whose activities are subject to the same. In this paper, we will refer to all of them collectively as the "professional" or "employees" of NTT DATA Spain Group.

The Code of Ethics and Professional Conduct affects to all entities comprising the NTT DATA Spain Group in the world, and their relationship is explained in detail on <https://es.nttdata.com/>.

In those countries where national regulations or local laws require the adoption of more restrictive rules or principles that the ones reflected in this document may be developed or complemented to develop its content.

Conduct guide

Preserving NTT DATA Spain Group' values make it necessary to establish mandatory rules of conduct which define NTT DATA Spain Group' expectations in terms of the conduct of its professionals at work, in resource management and in the business and social environment.

NTT DATA Spain Group professionals have a responsibility to report unlawful, fraudulent and immoral conducts and, in general, any other contravening the provisions of this Code of Ethics and Professional Conduct or the procedures or corporate policies company, following the procedure of Professional Warning System defined in this Code.

Conduct related to work

1. Professional competency – professional services

NTT DATA Spain Group commits to equal opportunities in the professional development of all employees. In particular, NTT DATA Spain Group encourages professionals to develop their skills, increase their leadership and create value for the company and clients.

Likewise, each NTT DATA Spain Group professional is expected to commit to actively seeking development opportunities, in order to permanently keep their knowledge and competencies up to date.

In this regard, we, the NTT DATA Spain Group professionals, should become involved in our own development, undertaking to invest the time, effort and resources necessary to develop and maintain the necessary competencies and knowledge. We should use the plans that the company provides for said purpose and respect the commitment of participation therein.

In this commitment the idea of the constant improvement of professional performance should prevail, in order to provide value to all clients, shareholders and society in general.

As NTT DATA Spain Group professionals, we should be demanding with ourselves and fulfill with excellence the objectives and performance standards established by the company.

2. Commitment to quality and innovation

NTT DATA Spain Group recognizes attaining the maximum satisfaction of all our opinion leaders and clients as one of its maximum values, providing top-quality products and services which anticipate and respond to their needs.

In this sense, NTT DATA Spain Group' quality methodology, constituted from a perspective of continued improvement, establishes the measures that make it possible to effectively incorporate quality in all company activities.

In accordance with the principles maintained by our quality system, all NTT DATA Spain Group employees are expected to:

- Orient their activity towards meeting the client's needs, providing the client with value.
- Commit to the daily practice of continued improvement, being obliged to comply with established quality standards.
- Carry out operating error prevention activities and aim towards production without deficiencies as a way of maximizing quality.
- Manifest their active collaboration to eradicate those processes that provide no value.

The concern and commitment to quality is the responsibility of all NTT DATA Spain Group employees. Therefore, we should perfect the knowledge and create a common business culture that makes it possible to adapt to the new demands of the business, at the same time as contributing to reducing costs and improving our efficiency and competitive position in the market.

NTT DATA Spain Group' quality methodology is called COM (COrporate Methods), and acts as a mechanism to draw together the experiences obtained in real project situations. COM's objective is to capitalize on these experiences in a set of easily applied methods, which make it possible to provide the most suitable solutions to our clients. In other words, quality solutions. This commitment is materialized in the international ISO 9001:2000, ISO 20000 at the offices of Madrid and Barcelona for the services areas and CMMi-3 certificates in the Madrid, Barcelona and Sao Paulo development centers.

COM also fosters a culture of improvement in all organizational areas. Not in vain, is our motto "Improve to compete"; since we firmly believe that capitalizing on our experiences, our good practices and transferring them to corporate knowledge, is essential to achieve an improvement in our productivity and, consequently, in our competitiveness. NTT DATA Spain Group promotes and manages different initiatives to encourage innovation among its professionals.

3. Objectivity

NTT DATA Spain Group' professionals must be impartial and not conditioned by external events or pressures (whether economic, political, etc., etc.) that may undermine the carrying out of our professional activity. Thus, the application of objective criteria is essential in all works carried out in NTT DATA Spain Group.

In this regard, it is necessary to be able to demonstrate this impartiality with third parties.

As NTT DATA Spain Group professionals, we are obligated to avoid situations that bring conflicts of interest or assume an erosion of loyalty to the company for its own interests, undermining the objectivity, independence and impartiality with which we carry out our mission.

Conflicts of interest may be personal or professional. It is understood that a conflict of personal interest occurs when personal interests, investments or NTT DATA Spain Group professionals (including individuals and / or legal entities directly or indirectly linked to them) collide with the interests of NTT DATA Spain Group or activities conducted by such professionals in NTT DATA Spain Group to third parties. A conflict of professional interest will be understood to exist where providing services to one client makes it impossible, for whatever reason, to provide services to another, the appropriate measures being required to resolve said impediment.

In case of any conflict of interest, the NTT DATA Spain Group professional involved shall inform immediately to the person in charge in the same moment it occurred and remit the appropriate communication of the situation to the Compliance Area via all.compliance@nttdata.com mailbox. The Department of Compliance could transmit it to the Legal Prevention and Compliance Committee (hereinafter, "Compliance Committee"). The Compliance Department or the Committee will adopt the necessary measures to resolve any conflicts, in accordance with the circumstances of each particular case.

If any professional is involved in legal, criminal or administrative proceedings, which may affect the exercise of their professional duties as NTT DATA Spain Group employee, accept public office, holding office administration or management in other companies or acquire shares / units or any interest in a

competitor, he must notify the company following the same procedure described in the previous section.

For the purposes of this paragraph, directly or indirectly related persons are any individuals that are familiar to any degree or others with a similar relationship as well as legal persons or have a percentage participation or a position that allows them to have control or significant influence on financial or operational decisions affecting them.

4. Dedication and incompatibilities

NTT DATA Spain Group professionals must have fair and full dedication to the exercise of their activity in NTT DATA Spain Group (unless otherwise stipulated).

It is not permitted to offer services to competitors, suppliers or clients, even in the case that dedication to NTT DATA Spain Group is not affected. NTT DATA Spain Group demands from its employees the devotion of their capacities and effort to the company.

NTT DATA Spain Group professionals cannot be subject to any situation of incompatibility, prohibition or conflict of interest, which prevent, restrict or limit the provision of services and / or advice to the company. In the event that any professional does not provide its services in NTT DATA Spain Group to work for a competitor or an end client, the employee should communicate at the moment the offer of the competitor has been accepted to his/her mentor and manager.

Professionals may not use the name of NTT DATA Spain Group or use their professional status at NTT DATA Spain Group, to perform their own benefit or others linked to it.

5. Communication

As NTT DATA Spain Group professionals, we should keep ourselves informed of everything which may, with general character, affect the company, as well as aspects which affect the working situation of the organizational unit itself.

This also covers the responsibility of seeking suitable advice on internal policies and, if applicable, pertinent legal requirements, which may affect their activities, such as, for example, aspects related to conduct stated in this Code, among which we can find legislation linked to disloyal practices or unfair competition, intellectual/industrial property, confidential/privileged information, accounting principles and financial information, etc., etc.

NTT DATA Spain Group employees are expected to regularly and systematically use the established communication channels in order to promote the feeling of unity within NTT DATA Spain Group and increase the relation between all of and contribute to suitable communication levels in all directions.

NTT DATA Spain Group encourages teamwork and sharing of knowledge and experience among all professionals in order to reinforce the multinational character of the company and to create competitive advantages in a global, complex and changing environment.

Every employee should transmit, wherever possible, their knowledge and professional experience to others in the organization since this information increases the company's knowledge capital. Hence, it is

each employee's obligation to support, attend and actively participate in any activity organized by NTT DATA Spain Group for its employees and thus be able to channel the transmission of knowledge. All of this without endangering the information secrecy and confidentiality obligations established in the present Code and the intellectual and/or industrial property rights that belong to or arise in favor of NTT DATA Spain Group due to these activities and the development of their benefits and services.

Conduct related to resources

6. Information management

We, the professionals, should protect NTT DATA Spain Group' interests in terms of the confidentiality of its strategy, business plans, technology, organization, knowledge, marketing, etc. We should also guarantee clients, suppliers or any third parties related to NTT DATA Spain Group, the confidential treatment of the information received from them, or about them.

As users of information, we should work with the principle that all information produced in NTT DATA Spain Group is the property of the company and we are obliged to indefinitely maintain confidentiality both as current and former employees.

All those who generate information on the company must specify in each case the degree of precaution with which this information should be distributed and filed, and any security measures that may be applicable.

No NTT DATA Spain Group professional may use, copy or disclose NTT DATA Spain Group, client or third party confidential information unless they have permission. This prohibition applies equally to any comment or discussion that NTT DATA Spain Group professionals may have with people outside NTT DATA Spain Group or in the presence of others, including people of their family and / or friends. It is also forbidden to collect or use sensitive information outside the company except where duly justified, authorized and without any risk to NTT DATA Spain Group.

NTT DATA Spain Group professionals must act at all times in good faith. It is their responsibility to pass on information about any situation or event that has occurred which, due to its significance or possibility of dissemination, may affect the organization, even when this eventuality seems remote.

7. Use of NTT DATA Spain Group assets

Each and every NTT DATA Spain Group professional are committed to responsible, safe and efficient use of company assets. This includes protecting them from any illegal or inappropriate use, in accordance with the policies and criteria of NTT DATA Spain Group.

NTT DATA Spain Group provides its professionals with a variety of resources (e-mail, computers, Internet, etc.) for professional use and for exclusive interest of NTT DATA Spain Group. In relation to other assets such as the technological infrastructure, including computer equipment, information systems, etc. as well as other assets including office buildings and their furniture, properties placed at their disposal and other material assets, they are all the property of NTT DATA Spain Group or on which operation and/or rights of use could be held. For this reason, NTT DATA Spain Group can access any of these resources at any time, to monitor and follow it up (on one or various occasions), in accordance with the applicable legislation, and the procedures for accessing professional resources published by it, and irrespective of whether the employee accesses the use in the offices or remotely from any other place, in the client's premises or from home through teleworking.

In the use of systems or access by users, they should comply with and make sure others comply with all

software licenses, copyrights and legislation that at any point regulate the intellectual and industrial property rights, as well as online activities or those related to providing information society services or telecommunications services. In particular, any programs, content, materials or applications that can damage or impair NTT DATA Spain Group systems or third party or that do not have the appropriate licenses or, in general whose use is contrary to any law or is prohibited or violate corporate policies or procedures of the Company cannot be installed or used in the computer equipment provided by NTT DATA Spain Group.

Unless there is agreement to the contrary, NTT DATA Spain Group is the owner of the rights of use and exploitation of any results of work of professionals as part of their business.

The treatment of information containing personal data, which users may access in NTT DATA Spain Group' organizational area, or under the aegis of the activities and provision of its services, is subject to the legislation in force in that respect (Spanish Data Protection Act and the implementing legislation) as well as the information privacy, confidentiality and security policies published by NTT DATA Spain Group.

NTT DATA Spain Group professionals may only will manage the personal data that are strictly necessary in each case for their work, and there must be a legitimate purpose to use or share and as specified below.

When there is access to personal data of client responsibility, NTT DATA Spain Group will only do it following its instructions, not using them for any other purpose than that provided in the employment contractual relationship and will not communicate to third parties without prior authorization from the client in the legally enforceable.

We do not keep any personal information beyond the time limits within which legally permitted or required as conservation and responsibilities for NTT DATA Spain Group.

In addition, NTT DATA Spain Group has taken technical and organizational measures that apply to guarantee confidentiality, integrity and security, and thus personal data covered in the course of their activities so as to prevent their alteration, loss, transfer or unauthorized access.

8. Use of the NTT DATA brand

One of the most valuable assets is the NTT DATA brand. Therefore, all employees must take maximum care in its use in conversations, reports, etc. and in the way NTT DATA Spain Group' professional and business activities are put into practice.

NTT DATA Spain Group' employees must suitably know and apply the NTT DATA brand manual.

NTT DATA Spain Group' employees cannot participate in damaging criticism or negative comments of its clients, suppliers, shareholders that may negatively affect the company's reputation.

NTT DATA' name and brand belong to the company and therefore cannot be used by third parties, whether clients or not, without due consent. Its authorized use will have to comply with the strictest commercial regulations, as well as the legal, regulatory and professional ethics requirements applicable

in each case.

Any mention of NTT DATA Spain Group in any media (including social networks) must respect in its entirety the contents of this Code of Conduct as well as NTT DATA Spain Group's internal procedures for the use of social networks.

NTT DATA Spain Group reserves the right to remove or request the removal of any contribution or publication, which, in its opinion, fails to comply with this procedure or, in general, with the contents of the current Code.

In any event, NTT DATA Spain Group will not be made liable for any opinions and content published on their official outlines and cannot offer any guarantee as to their truthfulness, accuracy, or currency.

Conduct related to the businessEnvironment

9. Relations with clients and suppliers

NTT DATA Spain Group should safeguard and protect its prestige. With said purpose, when circumstances suggest that the maintenance of a professional collaboration with clients or suppliers, due to the circumstances surrounding them, may damage or negatively affect NTT DATA Spain Group' reputation, said relation must be suspended, or, if applicable, be subject to review by the Regulatory Body of the Code of Conduct.

NTT DATA Spain Group professionals may not (directly or indirectly) accept, receive, offer, promise, grant or authorize the giving of money, favors, by promising benefits or any present or benefit to clients or providers, due to its value, may have an interpretation other than a mere detail or could provoke conflict between personal interests and NTT DATA Spain Group' interests, influencing professional judgement during the exercise of their activity.

It shall be considered that the reward received or given exceeds mere courtesy if it is different to and greater those typically given to other people who have had contact with that client or supplier. In the case of doubt, the superior organizational level should be informed and, in all cases, any reward (gift, trip, etc.) whose estimated amount exceeds the equivalent value of € 100, calculating this limit per client or supplier.

Each office can forbid or place a lower limit in accordance with the rules and uses of the corresponding country.

In no case is it permissible to ask suppliers or customers, either direct or indirectly, for any gifts or services regardless of their value.

All procurements of supplies and external services and, in general, relations with suppliers and clients, must be made by transparent procedures which comply with advertising and concurrence criteria.

NTT DATA Spain Group has internal policies that are defined in the procurement processes and supplies to service providers, which are based on the principles of impartiality, transparency and sustainability.

It is an NTT DATA Spain Group purpose to carry out their activities on behalf of clients and suppliers to conduct legal business activities and funding or financial support comes from legitimate sources.

10. Relations with Public Administration and civil workers

With regard to relations with the Public Administrations and public sector entities, the professionals of NTT DATA Spain Group must comply with and, be subject to, the regulations of relations with said Administrations/entities, and of applicable procurement, providing truthful information under the principles of transparency, honesty and integrity.

No professional may, directly or indirectly, offer, promise, grant or authorize the giving of money, gifts, favors, contributions or contributions of any official to obtain a benefit, grant, allowance or advantage for NTT DATA Spain Group. In particular, they must abstain or suspend any relation if there is any indication of corruption that may determine a preferential treatment, or which may give rise to an influence, favorable treatment or connected to any extortion or bribery.

Civil workers are those holding public office, officials, officers and employees of any public, semi-public agencies, government, or political parties or other connected associations, and any entities that receive funding or public subsidy.

11. Relations with external professionals and competitors

NTT DATA Spain Group promotes the development of professional relations in a broad sense with external persons and organizations, provided that they do not negatively affect company interests and do not involve providing confidential information from the company, nor harm competition or market competition.

In order to maintain NTT DATA Spain Group' competitive position in its market, it is important to have relevant and current information on the sector and on the competitors, provided that it is obtained legally and by legitimate means.

For guidance purposes, improper practices shall mean: Learn from the competition through espionage, bribery, burglary, wiretapping, interception of correspondence (electronic or physical) and intentionally communicate false information about competitors, their products or services.

12. Inside information. Relations with the capital market, investment groups and groups of interest connected to NTT DATA Spain Group as well as regulatory public bodies

Inside information is material information about a publicly traded company that is not known by the public. Information is considered “material” if it could affect the market price of a security or if a reasonable investor would attach importance to the information in deciding whether to buy, sell, or hold a security. Inside information often relates to financial conditions, such as progress toward achieving revenue and earnings targets or projections of future earnings or losses of any company. Inside information also includes changes in strategy regarding a proposed merger, acquisition or tender offer, new products or services, contract awards, and other similar information.

Inside information is not limited to information about the Company. It also includes material, non-public information about others, including the Company’s customers, suppliers, competitors, and shareholders.

Insider trading occurs when an individual with material, non-public information trades securities or communicates such information to others who trade. An insider who trades on the basis of material inside information violates the law. An insider who “tips” others violates the law if such persons trade on the basis of material inside information. For purposes of this policy, “Insider” means all officers, directors, Employees, consultants, and contractors of the Company and its subsidiaries, and all members of the immediate families and households of those persons. In addition, anyone who receives inside information from an Insider is an Insider. Insiders should assume that they have material inside information about customers or suppliers.

Insiders are prohibited from:

- Buying or selling stock or other securities while aware of inside information.
- Passing inside information to others, including Family Members.
- Trading when in possession of inside information received because of a confidential relationship or permitting others to trade on the information.
- Trading in the securities of other companies, including the securities of the Company’s customers or vendors, when in possession of inside information relating to such other companies.

Trading or helping others trade while aware of inside information has serious legal consequences, even if you do not receive any personal financial benefit. You may also have an obligation to take appropriate steps to prevent insider trading by others. Any insider possessing inside information may not discuss or disclose such information with or to any other Employee or outside contact, unless that individual has a clear right or need to know such information in order to fulfill his or her responsibilities to the Company. Under no circumstances should an insider make inside information available to his or her Family Members or business or social acquaintances.

According to the applicable law, including the related local law in those countries in which NTT DATA Spain Group performs its activity, there could be imposed severe criminal penalties against those who engage in insider trading as well as administrative sanctions on those that commit any Law infringement

(for example, in Spain, Article 285 of the Criminal Code and Articles 271 and the following, mainly linked to Articles 226 and 227, of the Securities Market Act).

Relations with the capital market and investors and financial analysts are exclusively channeled through NTT DATA Spain Group' financial department, from the area of relations with investors and financial institutions.

Within this area the reliability of the information that may be prepared, commented on or analyzed shall be restricted and subject to the corresponding validation, in the event of possible subsequent exchange or disclosure, whether in favor of said interested parties or due to legal requirements.

Likewise, the regulation in matters of inside information, which may have a significant effect on the financial position or on NTT DATA Spain Group' relations with said investors or groups of interest, shall be taken into consideration.

Relations with the media shall be channeled through the company's Marketing and Communication area.

Conduct related to the professional and social environment

13. With respect to the principles of non-discrimination and equal opportunities, as well as a safe professional environment

NTT DATA Spain Group considers that all employees must be treated with respect and dignity, avoiding any discrimination due to race, sex, ideology, nationality, religion, sexual orientation or any other physical, psychological or social condition. By virtue of these rights, NTT DATA Spain Group undertakes to maintain and protect, with all resources within its reach, a professional environment where dignity and fundamental professional rights are respected. In particular, NTT DATA Spain Group promotes equal treatment between men and women as regards access to employment, training, promotion and working conditions.

All professionals also have the right to an adequate working environment, free from problems of intimidation and which guarantees aid to any people suffering from intimidation, establishing the suitable disciplinary and corrective measures that avoid said situations from being repeated.

NTT DATA Spain Group categorically rejects any type of violence, abuse of authority, harassment (either physical or psychological) or any other intimidating or offensive conduct in the workplace and considers this to be unacceptable and intolerable, regardless of who the victim or the perpetrator is. For said purpose, policies or criteria are determined which safeguard equality and non-discrimination among the workforce and foster awareness of those rights and practices that violate them.

The People and Personnel Administration areas will establish an internal action protocol published by NTT DATA Spain Group.

This will make it possible to identify a situation of harassment in the workplace, both moral and sexist, in order to resolve a discriminatory situation and minimize its consequences. Personal rights will be guaranteed through management procedures, and the input of the mediator and control and prevention committee.

In addition to the Equality Plans, Criteria are established among its people management practices, which favor equal opportunities and objectivity in the evaluation, to recognize talent and encourage meritocracy. NTT DATA Spain Group evaluates the performance of its employees in an objective, transparent and useful basis for policies that rigorously measure professional performance.

For the same reasons, NTT DATA Spain Group selects its employees as needed to fill certain positions, considering just the personal and professional merits of the candidate.

In NTT DATA Spain Group, we understand the importance of eliminating barriers between our people, eliminating hierarchies and promoting autonomy, independence and freedom of each one of our professionals in performing their work. NTT DATA Spain Group ensures that all workers have the relevant permits and visas for the provision of services meets the current immigration regulations in each country.

NTT DATA Spain Group also establishes and promotes an occupational safety and health policy

published by NTT DATA Spain Group, adopting the measures it has available among those established in the applicable legislation.

Respect for the right to privacy is one of the principles that govern the commitment NTT DATA Spain Group with its professionals, so that no personal information will be treated for purposes other than those legally or contractually specified in the activities NTT DATA Spain Group.

Finally, NTT DATA Spain Group encourages its practitioners to provide the necessary attention to their obligations outside work (family, recreational, cultural, etc.), since they contribute to the development of the individual and the necessary balance between professional and private life. Therefore, a program has created to group flexibility measures that allow a balanced mix of personal and professional life, encouraging whenever possible, teleworking and flexibility in the exercise of functions.

14. Commitment to talent

NTT DATA Spain Group promotes the personal development of its employees, insofar as possible, in those areas where feasible, going beyond purely professional obligations.

In this sense, NTT DATA Spain Group supports the participation of its employees in congresses, conferences or seminars, promotes the publication of articles, studies and books, as well as giving courses on any matter in which they have special knowledge and interest (provided that confidential or restricted information of clients or the company is not included).

15. Social commitment

NTT DATA Spain Group also values membership of, and active participation in, activities of non-profit institutions and those declared of public use, provided that these activities are performed in their free time and on their own account.

NTT DATA Spain Group fosters this commitment through the NTT DATA foundation which was created in 2001 in order to cooperate with the company, through university institutions, developing human capital and disseminating knowledge on information technologies and their applications for the company.

The main objective of this foundation is the performance, promotion and fostering, at all levels and degrees, of education, teaching, training, research and professional retraining in the area of information technologies and the company.

16. Commitment to the environment

NTT DATA Spain Group also performs a policy of responsibility and respect towards the environment, through an environmental management system based on the ISO 14001 standard and materialized through its employees, clients and suppliers.

Preventing contamination by minimizing the consumption of natural resources, eliminating waste responsibly and recycling materials are some of the main objectives that NTT DATA Spain Group establishes as socially responsible company.

17. Monitoring of compliance with the Code

At any time, any professional may request for information or clarification in the scope of compliance of this Code by sending an email to the Compliance Area at the address all.compliance@nttdata.com for management and processing to the appropriate agency.

In addition, NTT DATA Spain Group places at the disposal of all employees a Professional Alert System (Whistleblowing). This System is available to all NTT DATA Spain Group employees through the global corporate Intranet, as well as its operating procedure.

The Whistleblowing constitutes a transparent channel which gives the right and responsibility of confidentially disclosing those actions or circumstances that may imply an irregularity or any act that is contrary to the Law, to this Code of Ethics and Professional Conduct or any of the internal policies, protocols or procedures of NTT DATA Spain Group. Therefore, it entitles and requires all employees to communicate any actions that they consider may harm NTT DATA Spain Group in a wide sense (including its reputation), its professionals or third parties NTT DATA Spain Group interacts with.

Access to the System will be given only to the Chairman of the Audit Committee, the Head of the Corporate Internal Auditing area, the Head of the Corporate Legal&Tax Advisory area, and the CRO, as the case may be, under confidentiality and security obligations. They will analyze the information received, its source and foundation in each claim and will decide if it is admissible and justified, resolving the case and, if necessary, conducting an investigation in order to determine whether the behaviors reported constitute an irregularity or an infringement.

NTT DATA Spain Group agrees not to take any form of retaliation, directly or indirectly, against professionals who have made a communication on the Alert System, except in cases of false accusation.

18. Disciplinary Regime

The violation of the rules contained in this Code of Ethics and Professional Conduct by NTT DATA Spain Group professionals, will be considered a breach thereof, and may result in the imposition of sanctions and / or taking appropriate legal action.

In particular, when in the context of a result of a complaint through the Alert System, the Compliance Committee determines that a NTT DATA Spain Group professional has been active contravening the provisions of this Code of Ethics and Professional Conduct, or corporate Policies and Procedures of the Company, will be send to the Audit Commission to decide on the application of disciplinary action under the regime of offenses and penalties provided for in the collective agreement or applicable labor laws, without prejudice to any other civil, criminal or administrative liabilities that are legally enforceable.

No NTT DATA Spain Group professional may request another, regardless of being in a higher hierarchical position, who commits an act that contravenes the provisions of this document or, in general, it is improper or illegal. In the same sense, no professional can justify violations of the Code of Ethics and Professional Conduct under cover of orders or instructions from a superior.

