



NTT DATA Payment Services Sdn. Bhd.
(formerly known as GHL Systems Sdn. Bhd.)
Group Human Rights Policy

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PREAMBLE

NTT DATA Payment Services Sdn Bhd, its related corporations as defined under the Companies Act 2016, and any other entities within NTT DATA Group for which NTT DATA Payment Services Sdn Bhd provides management oversight and strategic direction as the regional headquarters, now and in the future (the “**Group**”) is dedicated to upholding the principles and standards of NTT DATA Group. NTT DATA Group refers to NTT DATA Group Corporation and its consolidated subsidiaries. The Group recognizes that respect for human rights is an important corporate social responsibility and strives to correctly understand and acknowledge the laws and regulations of each country and region and their cultures, religions, values. We aim to realize a safe, secure, and prosperous, sustainable society by fulfilling this responsibility.

To this end, we will respect the Universal Declaration of Human Rights and other internationally recognized human rights in all our corporate activities. We will strive to ensure that we are not directly or indirectly involved in discrimination or other human rights violations. In the unlikely event of any negative impact on human rights, we will take appropriate action.

When negative impacts on human rights by business partners are directly related to the Group's relationships, products or services, we will require these partners to respect human rights and not violate them.

To fulfil this responsibility, senior management will take the initiative to respect all stakeholders' human rights. We will review and improve business operations and other aspects as necessary from the perspective of respecting human rights and reflect this in our business activities to establish a corporate structure that respects human rights.

CHAPTER 1: RESPONDING TO INTERNATIONAL NORMS

At the Group, we aim to achieve a sustainable society. We believe that our business activities can have a positive impact on society. As a company that operates globally, the Group supports the Universal Declaration of Human Rights, adopted as a common standard for all people and countries to achieve. The following international covenants and conventions were discussed and adopted from a global perspective.

The Group will also pursue ways to respect international human rights principles when there is a conflict between internationally recognized human rights and the laws and regulations of individual countries and regions.

- Universal Declaration of Human Rights
- International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- United Nations Guiding Principles on Business and Human Rights (“UNGP”)
- Declaration of Fundamental Principles and Rights at Work
- Eight core principles of the International Labour Organization:
 - “Forced Labor,”
 - “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"
"Elimination of the Worst Forms of Child Labour"

CHAPTER 2: ADDRESSING CRITICALLY IMPORTANT HUMAN RIGHTS ISSUES

In response to recent developments in information technology, internationalization, and the complexity and diversity of social structures, we believe it is necessary to consider human rights from a new perspective. People's awareness of respect for human rights is increasing.

Against this backdrop, as a global technology company, the Group will seek the following:

- promotion of "Diversity & Inclusion," a concept that recognizes diverse cultures and values,
- promotion of "Technology that is based on high ethical standards," which balances both high ethical standards and technology,
- promotion of "Healthy work daily life (health management)," which aims to develop a lively employee-friendly work environment
- promotion of "Appropriate expression, speech, and display" in consideration of human rights.

The Group will continue to identify important human rights that it needs to focus on from this perspective and act while respecting these rights.

■Promotion of "Diversity & Inclusion"

As part of a global ICT corporate group, the Group aims to create value through innovation to accommodate various needs on a global level. We also believe that respecting and utilizing our employees' diverse values and individuality is indispensable for adapting to extreme market changes and accommodating diversifying customer needs.

From this perspective, the Group considers diversity and inclusion an important management strategy and respects the following human rights to promote it.

• Prohibition of discrimination

We will respect diverse values and cultures and not discriminate based on race, nationality, ethnicity, place of origin, class, religion, creed, language, culture, gender, sexual orientation, gender identity, age, disability, illness, or appearance. We will also address issues unique to each country and region through our business activities, such as the Dowa problem in Japan.

Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful and non-discriminatory criteria.

• Respect for Freedom and Rights

We will respect the freedom and rights of individuals to the extent that they do not violate public welfare or social norms.

- **Fairness in the workplace**

We will strive for fair opportunities and fair wages in hiring, promotion, compensation, and training.

- **Disparity and poverty**

Through our business activities, we will contribute to the resolution of poverty caused by inequality and other social disparities.

■ **Promotion of "Technology that is based on high ethical standards."**

As a technology company, the Group is engaged in a variety of research and development. We believe that the new technologies created through such research and development must be able to maintain the symbiosis between humans and nature. To this end, we believe that it is necessary to pursue research and development, utilization, and social implementation of new technologies based on high ethical standards.

From this perspective, the Group will take responsibility for the appropriate use of technology and the protection, management, and use of data and will respect human rights, including the following:

- **Technology**

In the research and development of technology, we will deepen our understanding of its characteristics, constantly explore them, and respond appropriately with high ethical standards such as respect for human rights and consideration for the benefit of nature. We will also continue to monitor and respond to the various human rights issues brought about by the development of technology.

- **Data Bias**

We will appropriately address data usages' negative impact, such as data discrimination and algorithmic bias.

- **Privacy**

We will respect privacy and comply with privacy regulations in accordance with applicable laws, regulations, and guidelines in Japan and other jurisdictions.

- **Personal Information Protection**

We will handle each individuals' personal information appropriately and protect the rights and interests of individuals thoroughly. We will respond appropriately to inappropriate handling and use of information that is not in accordance with customers' wishes, increase the transparency of the use of collected data and monitor risks even after the services are provided.

- **Security**

We will prevent unauthorized access, loss, falsification, and customer information leakage by establishing an information security management system and implementing strict security measures on physical and system aspects. At the same time, we will strive to innovate security technology to help our customers live their daily lives without security concerns.

■Promotion of "Healthy work in daily life (health management)"

We believe that it is our social responsibility as a company to create a workplace where employees can work energetically in good health, both physically and mentally, to maximize their well-being and that of society.

To achieve this, we believe it is important to create a safe and secure workplace and promote a variety of work styles to suit different lifestyles and life events.

From this perspective, the Group will respect the following human rights.

▪ Diverse work styles

We respect various values and lifestyles and provide more work-friendly workplaces and work style options.

▪ Prohibition of forced labor and child labor

We prohibit all forms of forced and compulsory labor, human trafficking, and child labor, and work to correct or eradicate labor practices that violate human rights.

The minimum age for full-time employment must be 18 or the legal minimum age for employment under the applicable laws, whichever is higher. We shall as far as practicable ensure that all they will only conduct business with the supply chains that practices this particular policy strictly.

▪ Workplace safety

We will comply with the right to safe and healthy work and provide a safe and comfortable work environment.

We must at all material times protect their employees from any acts of physical, verbal, sexual or psychological harassment, bullying, abuse or threats or violence in the workplace by either their fellow employees, managers or senior management and directors.

We supervise to ensure that long working hours and other inhumane practices do not occur.

We must adhere to the applicable laws or industry standards, relating to working hours, overtime and benefits.

Employees must not be required to work more than eight (8) hours a day exclusive of the one (1) hour lunch break ("normal hours").

Notwithstanding the Paragraph above, if the employee is required to work overtime which is defined as hours in excess of the normal hours, the said employee must be paid promptly in accordance with the applicable laws of the respective countries.

In the event of major layoffs, the Group must, as a minimum, satisfy applicable laws and industry standards.

▪ Freedom of association and the right to organize

We respect the right of individuals to join or form a labor union of their choice, engage in union activities, participate in peaceful assemblies, bargain collectively, or refrain from such activities.

▪ Living wage

We seek to provide a level of wages and benefits appropriate to local jurisdiction and accept norms and provide the locally recognized level of income for employees.

- Extensive benefit programs

We will strive to enhance our benefit programs so that employees can lead healthy and fulfilling lives while balancing work, social activities, and family life with life events (childcare, childbirth, etc.).

We are committed to continuously develop employee skills and capabilities, and to provide opportunities for career advancement.

We must ensure that all employees have the right to annual and medical leaves, as well as parental leave for employees who have to care for a new-born or newly adopted child as provided by the applicable Laws.

- Employee Contracts/Letters

All employees must be provided with a written, understandable and legally binding employment contract/letter.

■ Promotion of "appropriate expression, speech, and display"

As the Internet becomes more and more widespread, the negative impact of harmful websites and slanderous content on social media on young people is becoming a social problem. In this context, companies are required to be more appropriate in their communications than ever before. From this perspective, the Group will absolutely refrain from discriminatory expressions, speech, and displays and respect the following human rights.

- Expressions in advertisements and displays

We strictly refrain from using expressions that promote discrimination, violate human rights, harassment, and other misleading expressions in the display and advertising of the services we provide. If such expressions are used, we will respond appropriately.

- Freedom of expression

We respect the right to express all speech and expression without censorship or regulation. In addition, we respond appropriately to indications of discrimination and human rights violations that violate public welfare.

- Accessibility

We will work towards ensuring and improving accessibility for the elderly, children, people with disabilities, the poor and other socially vulnerable people, and digitally divided people.

CHAPTER 3: SCOPE OF APPLICATION

This policy applies to all employees, officers, contract workers and independent contractors of all entities of the NTT DATA Group. We also ask our suppliers and business partners to support this policy and strive to respect human rights.

- Stakeholders

The Group is committed to respecting human rights throughout its business operations by proactively working with and engaging in constant dialogue with all of its partners and stakeholders, including customers, shareholders, investors, employees, local communities, business partners, other

companies and industry organizations, national and local government agencies, and NGOs, NPOs, and experts. We will comply with respect for human rights through our business activities while making the most of the voices of society.

We will build relationships of trust and cooperation with our stakeholders to better understand and respond appropriately from the perspective of those affected by our business.

▪ Value chain management

As the Group handles a wide variety of network and digital services worldwide, ensuring a sustainable value chain has become one of the most critical issues. Various problems have arisen in the supply chain in recent years, such as long working hours, child labor, illegal dumping of chemical substances, and bribery. Therefore, companies are required to comply with social norms and laws in their procurement activities and fulfill their social responsibilities.

In response to this situation, Group will ask all members of the value chain to comply with respect for human rights in the six areas of human rights and labor, health and safety, environment, fair trade and ethics, quality and safety, and information security, in order to fulfill our social responsibility in our procurement activities.

In the value chain, we will identify the existence and risks of human rights violations, such as forced labor, inhumane treatment, child labor, discrimination, and wages below the minimum wage, and work toward eradicating human rights violations.

CHAPTER 4: DUE DILIGENCE

Based on the Guiding Principles on Business and Human Rights, We will use the human rights due diligence process to identify, prevent, mitigate, and correct human rights issues on a global scale, and strive to raise awareness of human rights and improve human rights management throughout the Group.

In addition, due diligence will be conducted throughout the entire value chain, and direct dialogue will be the basis of our efforts, especially with important suppliers.

▪ Risk identification and assessment

As the environment surrounding human rights is constantly changing, we regularly conduct assessments of the impact on human rights.

Human rights managers from domestic and overseas companies discuss and select human rights issues to be addressed by NTT and determine priority issues to be addressed each year.

▪ Penetration into the business

We constantly review the Human Rights Policy and management and update and revise it if necessary. We establish common global targets for priority issues to be addressed and promote their penetration into the NTT DATA Group's business operations.

- **Confirmation of viability and effectiveness**

We will confirm the viability and effectiveness of the measures and check the progress. We will conduct training for employees on human rights issues to raise employee awareness and improve internal understanding.

- **Disclosure and evaluation**

Within the company, we will hold conferences that include global group companies to report on the results of our efforts and conduct dialogues. In addition, we disclose the details of due diligence on our website, sustainability reports, human rights reports, etc., to enable continuous evaluation and improvement.

- **Dialogue with third parties**

In each process, when risks are discovered, we will hold dialogues with experts and other third parties and work with everyone in the value chain to make improvements toward a broad and fair solution.

- **Suspension of transactions**

As a result of due diligence, if forced labor, inhumane treatment, child labor, discrimination, or wages below the minimum wage are recognized, we will take appropriate actions, including the suspension of transactions, and make improvements together with everyone in the value chain. In addition to this policy, we will also require you to comply with the NTT Supply Chain CSR Promotion Guidelines provided separately.

CHAPTER 5: ACCUSATION AND REMEDY

In order to prevent human rights violations, we have established internal and external contact points for whistle-blowing at each Group company, and we promise to protect whistle-blowers from unfair personnel actions (e.g., dismissal, demotion) or other disadvantages as a result of their reporting. Whistleblowers are advised to seek this channel to declare serious and significant matters that they believe may be menacing to NTT DATA's Group interest. Any complaint or report on human rights and labour standards infringement can be made to <mailto:wb@whistleblowerghl.com>.

In addition, consultations and reports received at the contact points will be reported appropriately to the Board of Directors to ensure transparency. We will take sincere measures to resolve the problems.

When there are conflicting matters between different human rights guides, we will appropriately respond through discussions among related parties based on international norms.

When human rights violations or threats of human rights violations occur, NTT is committed to resolving the problem through appropriate action based on prompt and accurate investigation of the cause and taking timely, fair and open action to fulfill our accountability to society.

