

10 Human Rights

I nnovative

R esponsible

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We engage in activities that promote awareness of human rights in order to create workplaces that respect the rights of every employee in terms of freedom from discrimination and harassment due to social status, family status, race, ethnicity, nationality, religion, physical or mental disability, sex, sexual minority, pregnancy and birth, and childcare or nursing care leaves.

NTT Group's Human Rights Charter

As a corporate group expanding its business globally, the NTT Group believes that respect for human rights is a key corporate social responsibility. We therefore believe that due consideration must be given to human rights and that human rights management must be strengthened for everyone involved in the NTT Group value chain. In 2014, we established the NTT Group Human Rights Charter to confirm those principles. The charter defines the human rights to be respected as those that are "internationally recognized" and states that the minimum standards for compliance are stipulated by the Universal Declaration of Human Rights, the International Bill of Human Rights, and the International Labor Organization's (ILO's) eight Core Conventions of the ILO Declaration on Fundamental Principles and Rights at Work. In addition, we have incorporated the ideals from the United Nations Guiding Principles on Business and Human Rights and ISO 26000 as the means for managing respect for human rights.

NTT Group's Human Rights Charter

We recognize that respect for human rights is a corporate responsibility and aim to create a safe, secure and rich social environment by fulfilling that 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 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 not to 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" refers to the declarations and rules considered to be the minimum standards that warrant international protection, and specifically include the following.

United Nations:

The Universal Declaration of Human Rights and the Two Covenants on Human Rights

- Universal Declaration of Human Rights (adopted by the U.N. General Assembly in 1948)
- "International Covenant on Economic, Social and Cultural Rights" and "International Covenant on Civil and Political Rights" (adopted by the U.N. General Assembly in 1966; came into effect in 1976)

International Labor Organization (ILO):

Fundamental principles laid out in the eight Core Conventions of the ILO Declaration

- The eight Core Conventions (adopted at the 86th Session of the International Labour Conference in 1998) are: Forced Labour Convention, Freedom of Association and Protection of the Rights to Organise Convention, Right to Organise and Collective Bargaining Convention, Equal Remuneration Convention, Abolition of Forced Labour Convention, Discrimination (Employment and Occupation) Convention, Minimum Age Convention, and Worst Forms of Child Labour Convention.

NTT DOCOMO Group's Basic Policies on Human Rights

Basic Policies and Philosophy

DOCOMO upholds the NTT Group Human Rights Charter, which was established by the NTT Group and is based on the Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The charter also incorporates ideas from the United Nations Guiding Principles on Business and Human Rights. Moreover, the NTT DOCOMO Group formulated its Basic Policies on Human Rights (revised in 2016) to define a more concrete policy for its initiatives and raise human rights awareness.

NTT DOCOMO Group's Basic Policies on Human Rights

Recognizing the importance of human rights, all NTT DOCOMO Group officers and employees are committed to taking the lead in creating a corporate culture that respects the human rights of all stakeholders while adhering to the NTT DOCOMO Group Code of Ethics, NTT Group Human Rights Charter and our CSR Policy with the aim of building a safer, more secure and richer society.

1. We will, through our business activities, strive for a solution on the Dowa issue* and other human rights issues.
2. We will respect diversity and strive to create a healthy working environment that is free of harassment issues by deepening communication and fostering a sense of mutual gratitude.
3. We will, from the standpoint of respect to human rights, review our operations as needed and adapt and improve our business activities.
4. We will cooperate with other NTT DOCOMO Group companies in constructing a proper structure to initiate and execute employee-focused human rights practices, including the establishment of the Human Rights Committee.

Human Rights Due Diligence

In accordance with the NTT Group Human Rights Charter, the NTT Group established its due diligence process for human rights, which it has been steadily implementing.

From December to January of fiscal 2019, we conducted a second in-house management survey, after conducting the first in fiscal 2016, to reaffirm our stance on potential human rights issues.



[Human Rights Due Diligence Processes \(NTT Group\)](#)

In fiscal 2015, the NTT Group sought to understand the social circumstances faced by its global business operations and determine the current human rights issues by conducting a pre-assessment. The results were used to create a human rights management check sheet which was in turn applied to conduct a human rights management survey to the 52 Group companies under NTT DOCOMO Group's control. From the survey, we identified priority human rights issues at all the Group companies and confirmed that 96.2% of them were providing employee education on human rights, including items identified as priority issues.

In addition, using the results of past internal surveys, the NTT Group has been conducting risk assessments through a specialized external institution. In fiscal 2017, we conducted a potential human rights impact assessment and identified key human rights issues. In fiscal 2019, we conducted a management survey to reconfirm that the priority issues were closely aligned with impact assessment results. Going forward, we will continue to strengthen our management system to enhance due diligence across the NTT Group.

As for our tier-1 suppliers, each year we assess them in regard to their sustainability risks, including human rights based on the NTT Group's Supply Chain CSR Promotion Check Sheet. The check sheet enables us to monitor violations of workers' freedom of association and right to collective bargaining as well as child labor and forced labor. If an area of high risk is identified by the Check Sheet, DOCOMO dispatches staff to the supplier to confirm the situation on-site and responds with actions that include working together with the supplier on corrective measures. As a result of assessment by the NTT Group CSR Promotion Check Sheet, no high risk related to human rights was found among any of our suppliers in fiscal 2019.

With respect to joint ventures (equity method affiliates) not

under our control, DOCOMO has created another check sheet as a simplified version of the NTT Group's human rights management check list to identify human rights risks and check if corrective measures for such risks are being properly implemented.

Management System

We established the Human Rights Committee for the management of our human rights initiatives. Chaired by the senior executive vice president, it consists of executive vice presidents, branch general managers, the general manager of the Human Resources Management Department, general manager of the Legal Department, general manager of Public Relations Department, general manager of the Corporate Social Responsibility Department, and Audit and Supervisory Committee members. The chairperson presides over the committee and is responsible for formulating and revising basic policies for promoting human rights awareness and taking action.

Establishment of the Corporate Human Rights Committee

The Corporate Human Rights Committee is a Companywide organization that promotes human rights awareness and handles the formulation and management of human rights training as well as training measures and plans. Compliance promotion managers and risk compliance leaders, who are in charge of human rights management in the workplace, are also designated at the unit level for activities rooted in respective workplaces.

Monitoring Human Rights Activities

DOCOMO conducts an annual human rights survey based on the NTT DOCOMO Group Code of Ethics.

In recent years, there has been increased demand, mainly

in Western countries, for companies to promote initiatives aimed at mainstreaming human rights throughout their supply chains. This has been reflected in various laws, including the UK Modern Slavery Act 2015, which came into force in 2015, and the California Transparency in Supply Chains Act, enacted in 2012. In consideration of this trend, we distributed an English version of the NTT Group's Human Rights Charter and NTT DOCOMO Group's Basic Policies on Human Rights in March 2016, and we also conducted human rights management surveys at our overseas subsidiaries in August 2016.

Results of the surveys are summarized by DOCOMO and reported to NTT. Feedback of the analysis results from NTT is then reflected in our activity plans.

In terms of domestic and overseas investments, we consider regulatory restrictions on human rights from the above-mentioned perspectives and assess risks during the decision-making phase using a checklist that includes criteria such as the working environment, terms of employment and the relationship between labor and management. Final investment decisions are made after hearing expert opinions.

Freedom of Expression and Protection of Privacy

DOCOMO gives careful consideration to protecting the freedom of expression and privacy rights of people communicating via the Internet, social media and digital communication devices, which are ICT industry specific issues that have been gaining more recognition by most telecommunications carriers in Europe and the U.S. With reference to the Principles of Freedom of Expression and Privacy established in 2013 by the Global Network Initiative, a global network of telecommunications companies, we take a stance to fulfill our own responsibility to respect and protect

the freedom of expression and privacy of our users. This includes protecting the globally recognized rights of our users, even in situations where we need to provide customer information under special circumstances, such as a matter of national security requested by the government. In particular, the Children's Rights and Business Principles calls for protecting children's rights in the areas of developing and offering products and services or in marketing or advertising activities. At DOCOMO, we provide the "Kids" phones and filtering service () as well as the "Smartphones and Mobile Phones Safety Class" () to ensure that children are safe when using them. Regarding marketing or expressions used in advertisements, we consult with in-house consumer affairs advisors to avoid any expressions that may result in harm to children ().

Principles on Freedom of Expression and Privacy

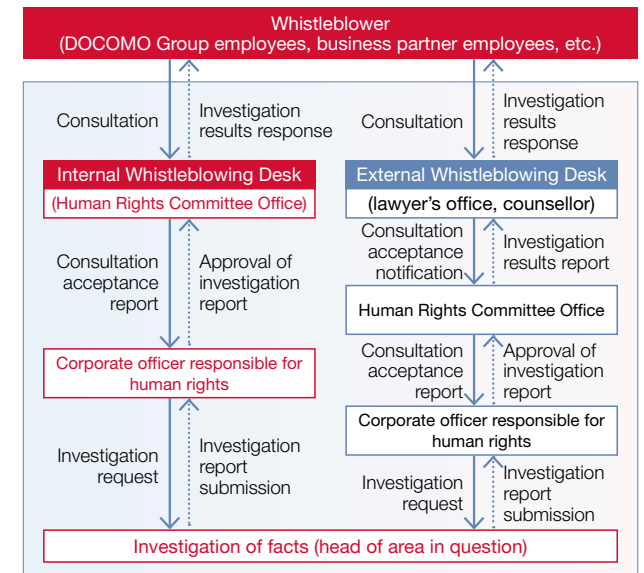
Whistleblowing Desk for Human Rights and Harassment

DOCOMO has established points of contact inside and outside Company channels for all employees, including temporary employees and employees of business partners to consult with when they have problems or concerns related to human rights or harassment. These whistleblowing desks protect the privacy of the employees who consult with them and provide protection for whistleblowers while taking appropriate steps to resolve problems and concerns. Employees can also consult the point of contact outside Company channels, which is manned by counselors affiliated with an outside, specialized organization so as to ensure an environment where employees can have complete peace of mind and know that they will not

receive any disadvantageous treatment as a result of engaging in consultation or whistleblowing.

There were 22 violations in fiscal 2019, of which 20 were associated with harassment and 2 with other human rights violations.

Whistleblowing Desk System for Human Rights and Harassment



Human Rights Violations

Human rights violations are rigorously dealt with and subject to disciplinary action. From the standpoint of preventing recurrence, we alert employees of the DOCOMO Group on a quarterly basis of any human rights violations. In the event of such a violation, the restoration process includes separation from the violator and prohibition of retaliation.

Initiatives on Human Rights Practice

Human Rights Message from Top Management

In conjunction with Human Rights Day (December 10) and Human Rights Week (December 4-10), which commemorate the UN's adoption of the Universal Declaration of Human Rights, the senior executive vice president and chair of the Human Rights Committee sends a message of respect for human rights to all employees every year.

The message is intended to raise awareness of the subject by promoting an understanding as regards the spirit and purport of the United Nations' Universal Declaration of Human Rights and to ensure that all employees are familiar with human rights issues.

Human Rights Awareness Training

To further raise human rights awareness, we actively conduct training at each organization for all employees every year, including temporary workers, using web-based training, video materials, and through discussions. We also hold training suited to each career level (including executives) and training for risk compliance leaders.

Starting with the basic question of "Why are companies addressing human rights issues now?" the training courses teach participants about a broad range of subjects, including discrimination, harassment and language sensitivity. We also implement a post-training survey to monitor improvements in awareness and the effectiveness of training.

Human Rights Awareness with Suppliers

We apply the NTT DOCOMO Guidelines for CSR in Supply Chain and encourage suppliers to actively engage in CSR. The guidelines include a policy on human rights to promote human rights awareness for everyone involved in DOCOMO's business including its supply chain.

[📄 NTT DOCOMO Guidelines for CSR in Supply Chain](#)

Human Rights Awareness Activities

We solicit human rights slogans and poster ideas from employees and give awards to exceptional entries in conjunction with Human Rights Week every year. In fiscal 2019, we received 23,204 entries for the slogans and 110 entries for the posters. In addition, we utilize an internal Company website to regularly publish an e-mail magazine on human rights, as a tool for raising the awareness of all employees.

Participation in the Industrial Federation for Human Rights, Tokyo

DOCOMO participates in the Industrial Federation for Human Rights, Tokyo, a voluntary organization comprising Tokyo based corporations. We attend training sessions, such as human rights awareness training for top management, presentations for group study, and training for employees in charge of human rights awareness. At the same time, we engage in activities to enlighten the public and expand human rights networks. The federation promotes human rights

awareness activities in other regions as well, and it convenes national conferences of the nationwide federation of corporations to battle discrimination against groups that have traditionally been targeted in Japan and also exchanges information.

As part of our initiative to cooperate with external organizations and groups, we engage in a wide range of initiatives through interaction and collaboration with government agencies, business organizations and civil rights movements involved in a broad spectrum of human rights issues and also participate in training provided by various other groups.