



Group Policy

Anti-Bribery and Corruption Policy

NTT Limited

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Governance, Risk and Compliance

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Gifts and Hospitality Policy	Sean Meisel, Senior Vice President, Group Governance and Risk
Referral Fee Policy	Larry Levin, Executive Vice President, Group Legal
SpeakUp Policy	Sean Meisel, Senior Vice President, Group Governance and Risk
Anti-Money Laundering Policy	Sean Meisel, Senior Vice President, Group Governance and Risk
Risk Management Framework and Policy	Sean Meisel, Senior Vice President, Group Governance and Risk
Group Authorities Matrix	Sean Meisel, Senior Vice President, Group Governance and Risk
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1. Introduction

Our Anti-Bribery and Corruption (**'ABC'**) Policy demonstrates NTT Ltd.'s and each of its subsidiaries' and affiliates' (**'NTT'**, **'we'**, **'us'**, **'our'**) commitment to conducting business ethically and with the utmost integrity in all our operations throughout the world. Conduct, Ethics, and Integrity is recognized as a Principal Risk in our business as our people, clients and communities expect us to do the right thing, and act with integrity even when no one is watching.

Our ABC Policy helps us to ensure that we maintain our independence at all times and act transparently, ethically and in good faith in our business activities. As a global business, we are required to comply with laws and regulations that apply to our business and regulate corrupt practices, including, but not limited to, the United States' Foreign Corrupt Practices Act (**'FCPA'**) and United Kingdom Bribery Act (**'UKBA'**). NTT, its employees and any related third parties (regardless of nationality or location) may be held liable for violations by third parties, even if the third parties would otherwise be subject to the FCPA or UKBA.

Bribery of any kind, regardless of the location, is illegal and a severe violation of our ABC Policy and Code of Conduct and Business Ethics (**'our Code'**) and will result in disciplinary action potentially leading to dismissal, and, in some jurisdictions, criminal prosecution.

A bribe is the offer, whether direct or indirect, of any advantage (which can include anything of value such as gifts, money, promises, meals, personal services, business or employment opportunities or other incentives) in order to influence or induce action, and/or secure an improper advantage.

Our leadership team drives our commitment toward building an ethical and transparent culture through the design and implementation of effective governance and operating models, policies (including the ABC Policy), frameworks, processes, standards, training, and assessment.

1.1. Purpose

The purpose of the ABC Policy is to:

- demonstrate and reinforce NTT's commitment to conduct business globally with the highest level of transparency, ethics and integrity;
- assign roles and responsibilities for ABC across NTT's operations;
- describe NTT's requirements for preventing and prohibitions against corrupt practices and behaviours in all of NTT's operations;
- formalize a common understanding and consistent approach to the management of risks resulting from corrupt practices and behaviours;
- ensure that NTT complies with all ABC laws and regulations that apply to its business operations; and
- maximize shareholder value and ensure sustainable business operations by proactively implementing ABC practices and controls.

1.2. Scope

The ABC Policy applies to NTT and all our people (including employees, directors, contractors, and shareholders; hereafter referred to as **'our people'**, **'employees'**, **'you'**,

'your') and third parties (including partners, joint ventures, suppliers, vendors, service providers, consultants, agents, resellers and intermediaries).

1.3. Non-compliance with the ABC Policy

Any employee who fails to comply with the ABC Policy may be subject to disciplinary action and/or any action permitted by law.

Any third party found to be in breach of the ABC Policy will result in immediate termination of our commercial agreements with them.

A breach of the ABC Policy may also constitute a criminal offence, punishable by law. The penalties, which apply to both the individual concerned and the organization can include the imposition of sanctions, financial penalties, and criminal prosecution, resulting in prison sentences for the perpetrator and any other parties involved who fail to report suspicions of corrupt practices in addition to heavy fines.

1.4. SpeakUp

It is your duty to speak up if you know of or suspect any unethical behaviour or misconduct that could be a breach of the ABC Policy, our Code, or any other NTT policies.

You can report your concerns to our anonymous and confidential SpeakUp platform, online or over the phone, as follows:



For our people: www.speakupfeedback.eu/web/ntt

For our clients, third parties and other stakeholders:
www.speakupfeedback.eu/web/nttexternals



Over the phone by dialing your country specific SpeakUp number as outlined in Appendix A of our [SpeakUp Policy](#)

We operate a strict non-retaliation policy for all reports made in good faith, meaning that any act or threat of retaliation for reporting concerns (such as dismissing, transferring, demoting or publicly attacking someone) will not be tolerated.

We are committed to ensuring that no one ever suffers any detrimental treatment for refusing to take part in bribery or corruption or reporting wrongdoing.

Our [SpeakUp Policy](#) describes our policies for reporting concerns about any unethical behaviour or misconduct in the business.

1.5. Local Variations and Exceptions

Our operating entities are responsible for compliance with any local laws and regulations that apply to their area of the business. If local laws and regulations establish more rigorous standards than provided in the ABC Policy or prohibit any activities outlined in the ABC Policy, then local laws and regulations must be followed by the relevant operating entity.

All local variations, additional requirements and/or exceptions to the ABC Policy must be reviewed by Group Governance, Risk and Compliance and formally recorded in an addendum to the ABC Policy.

1.6. Training

We are committed to building a transparent and ethical culture that ensures that our people and third parties act with integrity in all that we do.

All of our people and third parties must be aware of, understand and follow the ABC Policy and any applicable addendums to it.

Our people will receive mandatory, periodic training on the ABC Policy, related policies, controls, and practices. In particular, all new employees will be required to complete mandatory training on the ABC Policy and related policies and controls during induction.

1.7. Audit and Compliance

The design, implementation and operating effectiveness of the ABC Policy and its associated controls is subject to ongoing monitoring, review, and audit through the performance of periodic self-assessments, compliance assessments and independent audits (including internal and external audit). Where required, updates and/or improvements to the ABC Policy will be made based on the observations or findings of the self-assessments, compliance assessments and audits.

Compliance with the ABC Policy is monitored on a periodic basis and reported to the NTT Ltd. Board, Group Audit and Risk Committee, Group Governance, Risk and Compliance Committee and senior management.

1.8. Continual Improvement

The ABC Policy is subject to continual review and improvement and will be reviewed by Group Governance, Risk and Compliance at least annually.



2. Roles and Responsibilities

The ABC Policy is governed, supported, and implemented by the following roles within the company.

NTT Ltd. Board	<ul style="list-style-type: none"> • Ultimately accountable for the oversight and implementation of ABC policies and controls throughout NTT. • Ensure that NTT is committed to values of transparency, ethics, and integrity. • Ensure that our culture reflects our values and lives up to our Code. • Ensure that the organizational structures, systems, and management approaches support the implementation of our values and the ABC programme. • Ensure compliance with the ABC Policy.
Group Audit and Risk Committee	<ul style="list-style-type: none"> • Ultimately accountable for the oversight and implementation of the Risk Management Framework and Policy. • Approve all ABC Policies and any material local deviations, exceptions, or variations, where required.
Group Governance, Risk and Compliance Committee	<ul style="list-style-type: none"> • Responsible for providing oversight and ensuring the effective management of the Business Conduct and Ethics programme. • Enforce non-compliance with the ABC Policy.
Senior Vice President, Group Governance and Risk	<ul style="list-style-type: none"> • ABC Policy owner, who is responsible for the periodic review and update of the ABC Policy.
Business Conduct and Ethics Forum	<ul style="list-style-type: none"> • Manage the Conduct, Ethics and Integrity Principal Risk and ensure that relevant policies, processes, frameworks, standards, and training are in place to support implementation in the business. • Ensure the adoption of and effective implementation of the ABC Policy throughout the business. • Provide input and advise on any improvements that may be made to the ABC Policy and associated controls in the business. • Communicate with executives and senior management about the ABC Policy and associated controls.
Group Governance, Risk and Compliance	<ul style="list-style-type: none"> • Responsible for providing oversight and ensuring the effective management of the Business Conduct and Ethics programme.

	<ul style="list-style-type: none">• Identify, assess, manage, monitor, and report on ABC risks in accordance with the Risk Management Framework and Policy on a periodic basis.
Group Legal	<ul style="list-style-type: none">• Monitor regulatory changes that may impact the ABC Policy and provide input into the ABC Policy to ensure that it meets our legal obligations and is compliant with the relevant laws and regulations that apply to NTT.
Regional / Services CEO's	<ul style="list-style-type: none">• Accountable for ensuring that the ABC Policy is implemented within their area of the business.• Provide management oversight over the implementation of the ABC Policy in their area of the business.• Ensure that the organizational structures, systems, and management approaches support the implementation of the ABC programme in their area of the business.
Regional / Services Governance, Risk and Compliance Managers / Legal Counsel	<ul style="list-style-type: none">• Review the ABC Policy and identify any local variations, additional requirements and/or exceptions that may be required to support compliance with local laws and regulations.• Create sub-policies, processes, standards, guidance, or training to support the implementation of local variations, additional requirements and/or exceptions.• Monitor the design, implementation and operating effectiveness of the ABC Policy and its associated controls within their area of the business.• Identify, assess, manage, monitor, and report on local ABC risks in accordance with the Risk Management Framework and Policy.
Our people and third parties	<ul style="list-style-type: none">• Responsible for ensuring that they have read, understood, and adhere to the ABC Policy.• Submit the relevant declarations, required by the ABC Policy, when required, accurately and truthfully.• Do not take any actions to circumvent the ABC Policy and its associated controls.• SpeakUp when they see or encounter any unethical behaviours or misconduct in the business.

3. Policy Requirements

The sections below outline our ABC requirements and the activities that are either prohibited or must be subject to additional control or oversight when being undertaken by anyone who falls within the scope of the ABC Policy.

3.1. Financial Controls

- All accounts, invoices, memoranda and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off book' or recorded as 'miscellaneous' to facilitate or conceal improper payments.
- Where third parties make payments on behalf of NTT, NTT must request and maintain the receipts and/or invoices between the third party and their supplier.
- NTT must maintain current, accurate and complete financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- Off-shore payments are prohibited. Payments for any transaction should be in the country of operation of the responsible business unit. Prior to dealing with a third party, the location of the third party's bank account must be determined and verified that it is in the third party's country of operation.
- Only authorized employees may enter into commercial agreements and approve payments for goods and services. In every transaction ensure that appropriate authorization has been obtained in accordance with our [Group Authorities Matrix](#) or relevant local authorities matrix, where applicable.
- You must declare and keep a written record of all hospitality or gifts accepted or offered in the Hospitality and Gifts Register in accordance with our [Gifts and Hospitality Policy](#).
- You must ensure that all expense claims relating to hospitality, gifts or expenses incurred by third parties are submitted in accordance with our policies and specifically record the reason for the expenditure.

3.2. Restricted Payments

- The following payments (including cash payments, benefits, favours, gifts, hospitality, travel, donations, sponsorships, or training) are prohibited if they are intended to, or may be perceived to, secure an improper advantage, or influence a business decision (regardless of whether these are made directly or indirectly through third party intermediaries):
 - offering, giving, promising, or authorizing the giving of money, or anything else of value, to a public sector or government official; or
 - offering, giving, promising, receiving, or authorizing the giving of money, or anything else of value, to or from an individual or private sector organization.

3.3. Referral Fees

- Referral fees are prohibited and any exceptions are subject to approval from the Executive Vice President, Group Legal and Group Chief Financial Officer, in accordance with the [Referral Fee Policy](#).

3.4. Facilitation Payments

- We do not make, and will not accept, facilitation payments of any kind. Facilitation payments are typically small, unofficial payments (or payments in kind such as cigarettes, alcohol, or gifts) made to secure or expedite a routine government action by a government official or made in return for a business favour or advantage. Facilitation payment red flags are included in Appendix A. We must avoid any activity that might lead to, or suggest, that a facilitation payment has been made or accepted by NTT.
- In exceptional circumstances where threats are made to the life, limb or liberty of our people or others, facilitation payments may be permitted with the express authorization of the NTT Ltd. Board. In these circumstances, the Senior Vice President, Group Governance and Risk must be immediately notified and a record of the payment with supporting documentation must be maintained outlining the circumstances surrounding the payment and authorization obtained.
- If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt that details the reason for the payment. If you have any suspicions, concerns, or queries regarding any payment, you should raise these with your line manager, HR representative, local Governance, Risk and Compliance or Legal team, or the Senior Vice President, Group Governance and Risk.

3.5. Human Resources Controls

- Our recruitment process is open and equitable, and candidates are selected on the basis of their individual merits and integrity, suitability for the role and in accordance with our [Global Recruitment Policy](#).
- We are committed to a policy that no one will be penalized or negatively impacted for declining a bribe, facilitation payment, kickback or refusing to engage in other corrupt practices, even if this results in delays or losses in our operations.

3.6. Sales Incentives and Commissions

- All third party sales incentives and commission structures, including those offered to NTT and those offered by NTT to resellers, sales agents, or intermediaries, must be pre-approved in accordance with our [Group Authorities Matrix](#) or relevant local authorities matrix, where applicable, before being agreed and implemented.
- The incentive or commission offered must be appropriate and cannot be so valuable that there is a risk that employees or sales intermediaries may be improperly influenced or perceived to be improperly influenced.
- Process should be established, across all our operations, to ensure that commission payments and sales incentives are consistent with our commercial agreements, relate to well-defined and identifiable services that have been performed and are properly documented.

3.7. Conflict of Interest

- At all times, we are expected to act in the best interests of NTT and to exercise objective judgement in making business decisions, free from any external influences in accordance with our [Conflict of Interest Policy](#). A Conflict of Interest is any relationship, (personal or professional), influence or activity which may impair or give the impression of impairing your ability to (i) act in the best interest of NTT; or (ii) make fair and

objective decisions in the exercise of your duties or otherwise in the conduct of NTT's business. Conflicts of Interest arise when personal interests are placed ahead of the interests of NTT and those personal interests unduly influence business judgments, decisions, or actions. Making judgments, taking decisions, or pursuing actions when facing a Conflict of Interest may make it difficult to perform work for NTT objectively and effectively, and may have legal and regulatory consequences.

- All actual or potential conflicts of interest must be promptly, accurately and truthfully declared and approved using our [Declaration of Interest Form](#).

3.8. Gifts and Hospitality

- We must not give, offer, or promise a gift or hospitality of any value to a person or organization where it could reasonably be interpreted that the purpose of the gift or hospitality was to induce improper performance, to obtain or retain business, or gain an advantage in the conduct of business for NTT. Likewise, we should not accept any gifts or hospitality where such gifts or hospitality are intended to influence or perceived to influence business decisions of NTT.
- Our [Gifts and Hospitality Policy](#) describes the circumstances and conditions under which gifts or hospitality may be offered to or accepted from our clients, third parties or other parties. It also describes the circumstances and conditions where gifts or hospitality may not be offered or must be turned down.

3.9. Sponsorships, Charitable Contributions and Community Investments

- Any sponsorships for the purpose of promoting our reputation, brand, products or services must be offered with transparency and in accordance with the principles set out in the ABC Policy.
- NTT is committed to creating a more sustainable, better world that helps our communities thrive. As such, we may make informed charitable contributions or community investments (including donations, employee fundraising and volunteering, secondments of our people to charities and social enterprises, community sponsorships or related activities).
- Whenever we make any sponsorships, charitable contributions, or community investments we must ensure that we comply with applicable laws and regulations, are independent, transparent and act in good faith, and take reasonable steps to avoid:
 - any inflated payments that may be used to hide bribes or kickbacks;
 - use of 'front' organizations;
 - involvement of or contributions to a potential client, government body, political organization, or institution, or public officials;
 - undertaking vanity projects that don't meet the needs of the community and/or have adverse or negative consequences on the community or environment; and/or
 - engaging in initiatives that are intended to, or could be perceived to, improperly influence business decisions, or induce favours in the interests of NTT, its people or clients or other interested parties.
- Prior to making any sponsorship, charitable contribution, or community investment a documented and approved business case must be in place that includes:
 - a description of the purpose of the sponsorship, charitable contribution, or community investment;

- a description of the intended recipients or partners (including experts, events organizations, charitable organizations, other institutions, or individuals) and the impact thereon;
 - independence of NTT and/or its directors, shareholders, executives, or employees in relation to the sponsorship, charitable contribution, or community investment;
 - the value (financial or otherwise) of the sponsorship, charitable contribution, or community investment;
 - any due diligence activities undertaken to verify the identity of recipients, impact on the community and/or environment, capability and financial viability of the recipient, validity of amounts, fees or other expenses incurred, their commitment to ABC; and
 - any potential conflicts of interest that may result from the sponsorship, charitable contribution or community investment (including the impact on business decisions, and/or involvement of clients, public or government officials (and/or their close family members or friends), family members or persons with whom our employees have a close personal relationship, etc.) must be declared in accordance with our [Conflict of Interest Policy](#).
- The business case must be approved by the relevant line manager and the Senior Vice President, Group Governance and Risk, before any sponsorship, charitable contribution or community investment is made.
 - Appropriate authorization for sponsorships, charitable contributions and community investments must be obtained in accordance with our [Group Authorities Matrix](#) or relevant local authorities matrix, where applicable.
 - The terms of any sponsorship should be defined and documented in an agreement, that describes the parties to the sponsorship agreement, the nature, scope, and value of the sponsorship, and includes relevant ABC protections. Where possible, similar agreements should be in place when making charitable contributions and community investments.
 - All sponsorships, charitable contributions and community investments should be recorded and maintained in a register that documents the dates, size, nature, level of risk, business case and approvals obtained. The register must be kept current, accurate and complete.
 - After an appropriate length of time following the provision of a sponsorship, charitable contribution, or community investment, the responsible individual should obtain documentation to evidence that the funds were used as per the agreement with the recipient.

3.10. Political Engagement

- We are committed to transparent and responsible political engagement.
- All forms of political engagement undertaken by NTT must be documented and submitted to the NTT Ltd. Board for authorization prior to undertaking the engagement, including:
 - political contributions and donations;
 - lobbying; or
 - ‘revolving door’ practices (movement of high-level employees between the public and private sectors).

- Political contributions and donations are strictly prohibited unless prior written authorization has been obtained from the NTT Ltd. Board. Appendix B includes some examples of political contributions and donations.
- Political contributions and donations may only be authorized by the NTT Ltd. Board if they:
 - are permitted under applicable laws and regulations;
 - provide general support for on a balanced and proportionate basis to the main political parties and support a genuine democratic process; and
 - are open and transparent.
- NTT Ltd. board members, directors, executives and all employees are prohibited from making personal political contributions or donations in their capacity as representatives of NTT.
- At all times, any lobbying (whether directly or indirectly through intermediaries such as trade associations, consultants, agents, public relations firms or other agencies) must be performed in accordance with [our Code](#) and values.
- Any time we recruit a high-level employee from the public sector or a senior NTT employee moves to the public sector, a [Declaration of Interest Form](#) must be completed to ensure that any conflicts are appropriately managed in accordance with our [Conflict of Interest Policy](#) and/or any cooling-off periods required under laws and regulations are maintained.

3.11. ABC and Third Parties

- All third parties must be selected, on-boarded, managed and off-boarded in accordance with our third party risk management policies.
- At all times we only engage third parties who can demonstrate and have a track record of ethical business behaviour and uphold our ABC Policy and values. All third parties that we engage must be able to demonstrate their commitment to integrity and ABC policies and standards.
- All third party engagements must be authorized in accordance with our [Group Authorities Matrix](#) or local authorities matrices, where applicable.
- A contract must be in place with all third parties that includes specific ABC obligations with which the third party and any of its sub-contractors must comply.
- All third parties and their sub-contractors must adhere to our ABC Policy. Any breach of our ABC Policy resulting from actions or omissions of the third party and/or its sub-contractors will result in immediate termination of contract.
- A record of all third parties must be maintained that is current, accurate and complete including the following:
 - legal name of the third party;
 - ownership, directors', and officers' information;
 - description of the third party and the products or services provided;
 - compensation structure for the third party (e.g., sales commissions);
 - industry sector in which the third party operates;
 - country in which the third party is based and where services are provided from;
 - volume of business with and criticality of the third party;

- financial information;
- summary of the third party's credentials and capabilities;
- any sub-contractors that the third party may engage to perform the work;
- integrity and ABC policies and standards of the third party;
- any significant ABC risks associated with the third party (including any past litigation, public administrative sanctions against the third party or its management, etc.);
- indication of whether the third party appears on any sanctions lists;
- third party relationships with public sector or government officials (including professional and private relationships); and
- how the third party was identified by or referred to NTT.

Appendix A Facilitation Payment Red Flags

Below is a list of red flags that may indicate a potential facilitation payment or kickback.

Transactions

- A pattern of small payments in repeated situations such as customs, taxation, per diems.
- Expense claims which have no supporting documentation and lack explanation of purpose.
- Cash advances made to employees for no apparent valid purpose.
- Expense payments made in round sums.
- Payments made under self-prepared vouchers rather than third party documents.
- Miscellaneous or unspecified sums included in invoices and unchallenged by the company.
- Expenses appear excessive for the indicated activities.
- Evidence of payments that are not recorded in financial records.
- Expenses cannot be satisfactorily explained.
- Petty cash use is excessive.

Evidence from outcomes

- Undue favorable treatment by government or public officials or private sector companies.
- Agent moves employees quickly through passport control in groups.
- Speedy entry into a country despite known demands and delays at border controls.
- We move goods quicker through ports and customs than our competitors.
- Expenses patterns differ between employees in similar circumstances or activities.

Absence

- No anecdotal evidence or reports are made to management related to difficulties regarding facilitation payments or kickbacks despite operating in an environment where demands for such payments are commonplace.
- No facilitation payments or kickbacks are reported or recorded in the books as having been made.
- Local contacts and peer companies identify concerns about facilitation payments or kickbacks being demanded by particular government departments, but no reports have been made by our employees or intermediaries.
- The agent or other third party does not wish our employees to be present at negotiations or interactions with officials.
- The agent or other third party shows lack of commitment or interest in countering facilitation payments or kickbacks.

Appendix B Political Contributions and Donations

Some examples of political contributions and donations include:

- financial donations;
- secondments to political parties;
- loans of money at less than market interest rates;
- discounted fees or rates for products or services;
- sponsorship of an event or publication;
- subscriptions or affiliation payments;
- free or discounted use of facilities or services such as offices, transport, printing, telecommunications, advertising, and media coverage; or
- sponsorship or support for fundraising events, such as a fundraising dinner.

In addition to the examples outlined above, we should be vigilant and ensure we have completed a [Declaration of Interest Form](#) or obtained approval for Gifts and Hospitality when we:

- release employees without pay for political campaigning;
- provide gifts or hospitality to public sector or government officials;
- provide travel for public officials at NTT's cost;
- purchase a stand or event at a party conference;
- honoraria for politicians or civil servants to speak at company events or sponsored events; or
- engage in political action committees or lobbyist groups.