



Fair Business Practices

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NTT DOCOMO seeks to enhance corporate value by ensuring quick, transparent, and sound management based on effective corporate governance.





Materiality

Pursue Respect for Human Rights and Fair Business Practices

Goal To enhance corporate value through business operations grounded in high ethical standards and a strengthened management foundation

Sustainability Issues

- Respect for human rights
- Ethics and compliance
- Supply chain management
- Risk management and governance

Strategy

The NTT DOCOMO Group seeks to enhance corporate value in collaboration with stakeholders by ensuring quick, transparent, and sound management based on effective corporate governance.

Risks

The occurrence of legal violations, as well as sustainability risks such as human rights and environmental issues arising within the value chain, may affect the provision of services and continuity of business operations, potentially leading to a decline in social credibility and brand image.

Opportunities

We will earn the trust of stakeholders by respecting human rights, ensuring thorough compliance, reinforcing supply chain management, and strengthening risk management, thereby enhancing corporate value and building a solid foundation for sustainable management.

FY2024 Initiatives

- We listen to feedback from employees nationwide and work to address issues by openly and clearly visualizing them.
- We established the NTT Group Basic Policy on Customer Harassment to promote the development of a safe, comfortable working environment for employees, while also enhancing training programs to raise compliance awareness.
- Human rights violations are rigorously dealt with through thorough internal communication and by raising awareness to prevent recurrence and provide redress measures for victims.
- In response to the 2024 revision to the Unfair Competition Prevention Act, which came into force on April 1, 2024, we revised the Guidelines on the Prevention of Bribery of Foreign Public Officials, thereby tightening and expanding our efforts to ensure thorough legal compliance and strengthen preventive measures.
- As part of supply chain risk assessments, we conducted sustainability assessments of key suppliers and engaged in direct dialogue with suppliers where potential risks were identified.

Key FY2024 Results [P. 24 Metrics and Targets](#)

Number of confirmed human rights violations



24

Number of anti-competitive illegal acts and bribery cases



0

Direct dialogue carried out with key suppliers requiring improvement



100%



Human Rights

We promote awareness of human rights to create society that respect the rights of every employee in terms of freedom from discrimination and harassment due to social status, family origin, race, ethnicity, nationality, religion, disability, gender, sexual minority, pregnancy, birth, and childcare or nursing care leave.

Basic Philosophy

Recognizing that respect for human rights is a key corporate social responsibility, the NTT DOCOMO Group regards the NTT Group Human Rights Policy as the foundation for respecting human rights and practices the ideas expressed in the NTT DOCOMO Group's Basic Policies on Human Rights.

NTT Group Human Rights Policy

As a corporate group operating business globally, the NTT Group recognizes 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. In November 2021, we incorporated the charter as part of the new NTT Group Global Sustainability Charter and established the NTT Group Human Rights Policy to achieve a sustainable society that provides greater security, safety, and prosperity. The NTT Group Human Rights Policy reflects the Universal Declaration of Human Rights and other international conventions and treaties and applies them to all NTT Group employees and officers. We also expect all of our suppliers and business partners to support this policy and to respect human rights.

NTT Group Human Rights Policy (Outline)

(1) Addressing to International Norms

The NTT Group discloses its global human rights policies both internally and externally, in addition to meeting the requirements* of international laws and evaluation organizations.

*International conventions and treaties adopted from a global perspective including Universal Declaration of Human Rights

(2) Addressing Critically Important Human Rights Issues

The NTT Group will identify critically important human rights issues and take action on these priority themes through the following:

- Promotion of Diversity & Inclusion (Prohibition of discrimination, respect for freedom and rights, fairness in the workplace, economic disparities, and poverty)
- Promotion of Technology based on high ethical standards (technology, data bias, privacy, personal data protection, and security)
- Promotion of Healthy Work in Daily Life (Health Management) (diverse work styles, prohibition of forced labor and child labor, workplace safety, freedom of association and the right to organize, living wage, enhanced benefits)
- Promotion of appropriate expressions, speech, and other presentations with consideration for human rights (Freedom of expression and respect for human rights in advertising and other presentations)

(3) Scope of Application

This policy applies to all employees and officers of the NTT Group. We also ask our suppliers and business partners to support this policy and strive to respect human rights.

(4) Due Diligence

Based on the UN Guiding Principles of Business and Human Rights, we will use the human rights due diligence process to identify, prevent, mitigate, and correct human rights issues globally. And we will strive to improve human rights awareness and human rights management throughout the NTT Group. In addition, due diligence will be conducted among the stakeholders in the entire business value chain, and a direct dialogue will be the basis of our efforts, especially with major suppliers. The status will be disclosed on our website, in our Sustainability Report, and in our Human Rights Report to evaluate and improve the process continuously.

(5) Accusation and Remedy

The NTT Group has established internal and external contact points for whistle-blowing at each Group company to prevent human rights violations. We promise to protect whistle-blowers from unfair personnel actions (e.g., dismissal, demotion) or other disadvantages resulting from their reporting. In addition, consultations and reports received at the contact points will be reported to the Board of Directors appropriately to ensure transparency. We will take sincere measures to resolve problems.



NTT DOCOMO Group's Basic Policies on Human Rights

The NTT DOCOMO Group has established its Basic Policies on Human Rights (revised in 2016) to provide a more concrete policy for its initiatives and raise awareness of human rights.

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 Group Human Rights Policy, NTT DOCOMO Group Code of Ethics, and our Sustainability 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 human rights practices, including the establishment of the Human Rights Committee.

NTT DOCOMO Group Basic Policy on Customer Harassment

The NTT DOCOMO Group established the NTT Basic Policy on Customer Harassment to create a safe, comfortable working environment for employees, which leads to providing better services. This policy is intended to protect employees from customer harassment through malicious behavior, threats, and unreasonable demands and ensure the continued provision of high-quality services.

[NTT Group Basic Policy on Customer Harassment \(in Japanese only\)](#)

Human Rights Due Diligence

The NTT Group established and has been implementing in stages its human rights due diligence process. NTT DOCOMO, NTT DOCOMO Business, and NTT DOCOMO Solutions are also strengthening supplier engagement through external evaluations such as EcoVadis*. Going forward, we will continue to strengthen our management system to enhance due diligence across the NTT Group.

*EcoVadis is an organization that evaluates a company's sustainability performance across its supply chains to facilitate improvement. To date, it has assessed more than 150,000 companies.

▶ NTT Group's Initiatives for Respecting Human Rights

2011	United Nations' Guiding Principles on Business and Human Rights
2014	NTT Group Human Rights Charter <ul style="list-style-type: none"> • Formulation of global policy
2015–2018	Establishment of the human rights management system <ul style="list-style-type: none"> • Conducted pre-assessment, human rights management survey, impact assessments, etc.
2019	Human Rights Management Survey (Group companies in Japan and overseas, the second survey) <ul style="list-style-type: none"> • Identified Group human rights issues to prioritize
2020	Human Rights Dialogue (Group companies in Japan and overseas) <ul style="list-style-type: none"> • Nurtured a shared understanding of human rights issues across Group companies Identified issues with the help of external experts Conducted a gap analysis of the human rights management that society expects of companies
2021	Established the NTT Group Human Rights Policy
2022	Strengthen Supplier Engagement <ul style="list-style-type: none"> • Strengthen risk assessment through direct dialogue with suppliers • Adopted EcoVadis for supplier assessment
2024	Established the NTT Group Basic Policy on Customer Harassment

[NTT Group Human Rights Policy](#)

In conducting sustainable supply chain management, NTT DOCOMO, NTT DOCOMO Business, and NTT DOCOMO Solutions define tier-one suppliers as those that either meet a certain scale or provide irreplaceable products. We annually assess these suppliers on their sustainability risks based on the Self-Assessment Questionnaire (SAQ), including EcoVadis.



With regard to human rights, we monitor violations of workers' freedom of association and right to collective bargaining as well as child labor and forced labor. Based on this assessment, our employees engage in direct dialogue with suppliers that require improvement, to understand their situation and discuss remedial measures [P. 145](#).

In addition, as part of the NTT DOCOMO Group's initiatives for joint ventures (equity method affiliates) not under our control, NTT DOCOMO conducts assessments based on its own simplified version of the NTT Group's human rights management checklist to identify human rights risks and confirm that corrective measures for such risks are being properly implemented.

Management System

NTT DOCOMO established the Human Rights Committee at both the head office and branch offices to effectively organize human rights awareness activities Company-wide. The Human Rights Committee at the head office is chaired by the senior executive vice president and consists of executive vice presidents, executive general managers of regional offices, the general manager of the Corporate Affairs & Human Resources Department, the general manager of the Legal Department, the general manager of the Brand Communication Department, the general manager of the Sustainability Promotion Office, 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 Human Rights Committee

The Human Rights Committees at the branch offices work in coordination with the head office committee to formulate plans and manage the progress of human rights awareness activities

in each organization. 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 human rights promotion activities rooted in their respective workplaces.

Freedom of Expression and Protection of Privacy

NTT DOCOMO gives due 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 human rights issues that have been gaining recognition. Even in situations where we need to provide customer information under special circumstances, such as matters of national security requested by the government, we seek to fulfill our responsibility to respect and protect human rights, including the internationally recognized freedom of expression and privacy of our users. 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. To ensure the safety of children in our products and services, NTT DOCOMO provides the Kid's Keitai (mobile phone) and Filtering Services [P. 78](#). We also offer Smartphone and Internet Safety Classes [P. 84](#) as awareness-raising activities to encourage safe use. In addition, our in-house Advisory Specialists for Consumer Affairs review marketing and advertising expressions to avoid expressions that may be harmful to children.

Furthermore, in 2018 we developed the Personal Data Charter, which represents our principles for using personal data to continuously provide new value to customers and society while ensuring optimum privacy protection and published it in 2019. Initiatives associated with information

security and privacy protection are included as part of our risk management [P. 97](#).

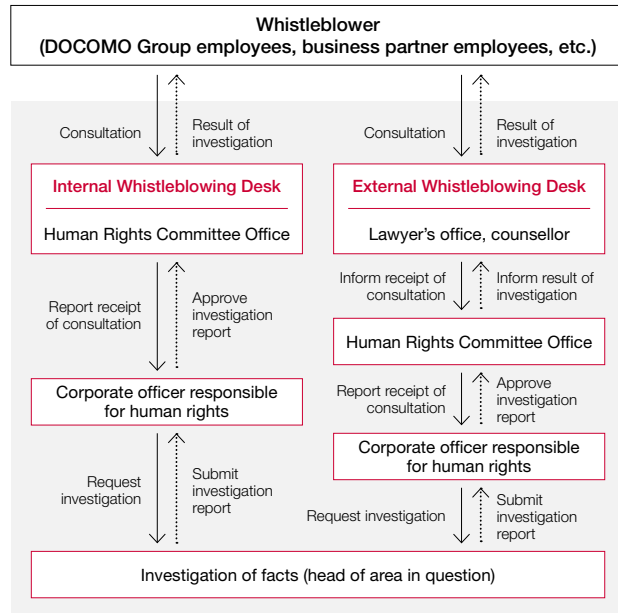
Whistleblowing Desk for Human Rights and Harassment

NTT DOCOMO has established internal and external reporting channels for all NTT DOCOMO employees, including temporary employees as well as employees of suppliers, to consult with on 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. For instance, the external channel provides an environment in which employees can have complete peace of mind, such as by staffing it with counsellors from external specialist organizations to provide support, and it ensures that employees will not receive any disadvantageous treatment engaging in consultation or providing reports.

In fiscal 2024, there were 24 reports related to human rights, and none involved serious violations of these rights.



► Whistleblowing Desk System for Human Rights and Harassment



Human Rights Violations

NTT DOCOMO Group rigorously addresses human rights violations and subjects them to disciplinary action. From the standpoint of preventing recurrence, we use case studies to call attention to and inform NTT DOCOMO employees about these issues and other inappropriate conduct that may not be subject to disciplinary action on a quarterly basis. In the event of a violation, we take measures such as separating the offender from the victim and prohibiting retaliatory acts to ensure redress and protection for the victim.

Whistleblowing Desk System for Human Rights and Harassment

Human Rights Message from Top Management

NTT DOCOMO, 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, has the senior executive vice president and chair of the Human Rights Committee send a message of respect for human rights to all employees every year. The message is intended to raise awareness of the subject by promoting understanding of the spirit and purpose of the United Nations' Universal Declaration of Human Rights and to ensure that all employees are familiar with human rights issues.

Human Rights Message from Top Management

To further raise human rights awareness, the NTT DOCOMO Group annually conduct training at each organization for all employees, including temporary workers, using web-based resources, video materials, and discussions. We also hold training suited to each career level (including executives) and training for risk compliance leaders. The training is designed to cover a broad range of subjects, from the basics, such as why companies should address human rights, to discrimination, sexual harassment, power harassment and language sensitivity. We also implement a post-training survey to monitor improvements in awareness and the effectiveness of training.

[□ P. 141 Compliance Training](#)

Human Rights Awareness Activities

At the NTT DOCOMO Group, 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 2024, 18,979 entries for the slogans were received.

Participation in the Industrial Federation for Human Rights, Tokyo

NTT DOCOMO participates in the Industrial Federation for Human Rights, Tokyo, a voluntary organization comprising Tokyo-based corporations. We also take part in activities that lead to social enlightenment and expand human rights networks, such as human rights awareness training for top management, presentations for group study, and seminars for employees in charge of human rights awareness. 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, where we actively participate and exchange information.

We also place high priority on cooperating with external organizations. 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 we also participate in training provided by other groups.

Compliance

Basic Philosophy

The foundation of the NTT DOCOMO Group's compliance management is to promote strict observance of the Group's Code of Ethics and respect for human rights



among all employees, and to continue to meet the ever-increasing demands and expectations of society based on high ethical standards.

NTT DOCOMO Group Code of Ethics

The NTT DOCOMO Group seeks to develop a shared awareness and thorough understanding of the basics of compliance as the foundation of management. To that end, we are developing our ethical standards through ten defining principles, including legal and ethical compliance; securing the transparency of business operations through information disclosure; fair, open, and free competition and trading; and respect for employee human rights. An English language version of this Code of Ethics has also been published for sharing across the Group internationally.

[NTT DOCOMO Group Code of Ethics \(in Japanese only\)](#)

Compliance Management Regulations

NTT DOCOMO has established the Compliance Management Regulations, which define the standards for promoting activities for ensuring legal compliance and corporate ethics, addressed as part of the Company's corporate social responsibility. The regulations apply to all individuals employed by DOCOMO, including officers, full-time employees, and temporary staff.

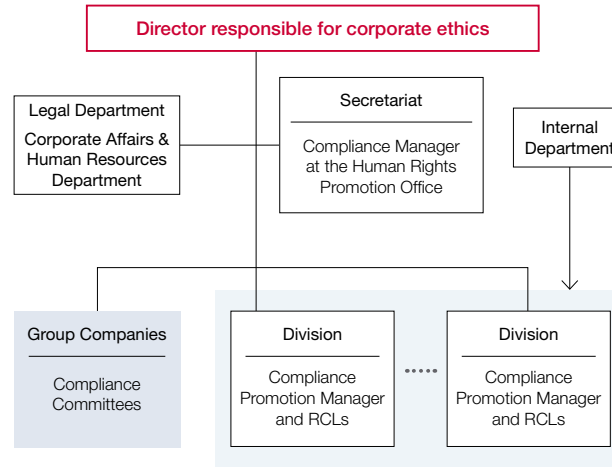
Compliance Management System

The NTT DOCOMO Group has established compliance committees at its head office and each regional office and Group company to ensure that employees know and understand the NTT DOCOMO Group Code of Ethics. Each committee decides on matters related to legal and ethical compliance and identifies issues and areas in need of

improvement in terms of compliance management. They also monitor the progress of activities that promote compliance.

The committee at DOCOMO's head office is chaired by the president and CEO, and its members consist of the senior executive vice president, executive vice president, executive general manager of regional offices, general managers of each division, directors who are Audit & Supervisory Committee members, and others appointed by the chairperson as needed. The committee deliberates and decides on the initiatives for the next fiscal year based on the results of the current fiscal year's initiatives and analysis of the status and trend of the current year's whistleblowing reports. Moreover, compliance promotion managers are assigned to each organization, and we conduct compliance and human rights awareness surveys for all employees and incorporate the results into various initiatives to further strengthen our ethical standards.

► Compliance Management System



Compliance Committee Office

The office promotes Company-wide compliance and collaborates with each RCL to address individual issues and exchange information.

Compliance Promotion Managers

These managers are assigned to all divisions and are responsible for formulating, implementing, and managing the progress of action plans for legal and ethical compliance within their respective organizations. Their duties include identifying compliance risks, deepening understanding of respect for human rights, and developing improvement measures for any aspects deemed inadequate. They also monitor the compliance status within their assigned organizations and report the results to the director responsible for corporate ethics (or to the executive general manager of the regional office).

Risk Compliance Leaders (RCLs)

RCLs are appointed by compliance promotion managers, who promote risk management, compliance, and human rights awareness within their respective organizations. They carry out daily activities to promote compliance and human rights practices within their organizations and respond quickly and effectively when a compliance risk arises.

Consultation and Reporting Mechanism

NTT DOCOMO has established reporting channels, available to business partners as well as NTT DOCOMO Group employees and NTT Docomo Shop staff, for the prevention and early detection of compliance issues or risks related to human rights. Whistleblowing desks for compliance and human rights have been set up, including a channel at an external legal firm, to safeguard the anonymity of those seeking consultation. We maintain an environment that encourages employees to file reports by accepting them by phone, email, letter, or fax in

addition to stipulating rules to protect the privacy (anonymity) of individuals seeking consultation and ensure that they are not treated unfairly for coming forward. The contact details for the whistleblowing desks are published on our corporate website, and we actively disseminate information through magazines and the distribution of posters.

Cases that are the subject of consultations of reports are investigated as needed by the Compliance Committee Office and the Human Rights Committee Office in coordination with relevant compliance promotion managers (heads of organizations) and RCLs. Confirmed violations or misconduct are reported to the director responsible for corporate ethics and other members of management, as well as members of the Audit & Supervisory Committee. Necessary steps are then taken and measures put into place to prevent any future recurrence. Incidents are analyzed and trends are reported to employees across Japan at periodic internal meetings and incorporated into compliance training.

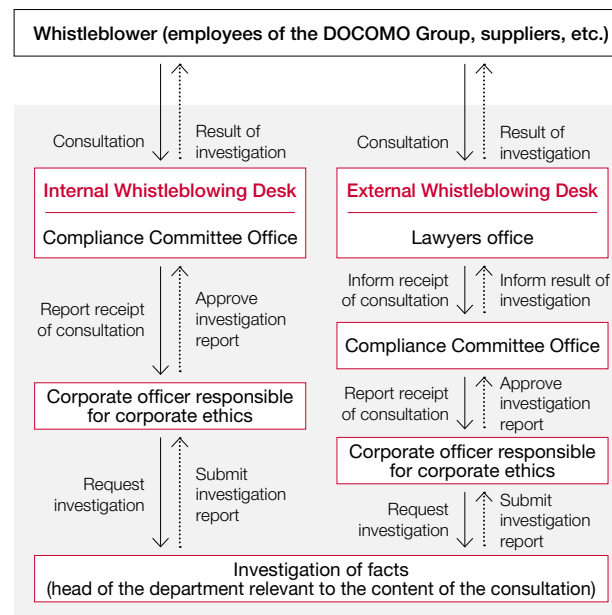
A total of 487 cases were brought to consultation and reported in fiscal 2024.

► Compliance and Human Rights Consultations Managed by the Whistleblowing Desks

	FY2021	FY2022	FY2023	FY2024
Number of consultations on compliance	611	484	444	487
Number of compliance violations	28	28	21	44
Unauthorized use of expenses, etc.	4	2	1	3
Harassment	13	12	11	24
Other compliance violations	11	14	9	17
No violations	583	456	423	443

Scope: Employees of the DOCOMO Group, suppliers

► Compliance Whistleblowing Desk System



behaviors that could potentially lead to power harassment. We also provide training for RCLs, who are tasked with promoting compliance activities in their respective departments, to establish a common awareness of the roles expected of leaders and share information. Furthermore, we hold a compliance seminar exclusively for members of upper management.

In fiscal 2024, NTT DOCOMO provided training programs for all employees on scientific approaches to preventing power harassment and on customer harassment prevention, achieving a 100% participation rate.

► Results of Compliance Training in Fiscal 2024

Name of Training Session	Training Theme	Target Participants	Participation Rate
Scientific Approaches to Preventing Power Harassment	Power harassment prevention	All employees	100%
Customer Harassment Prevention Training	Customer harassment prevention	All employees	100%
Compliance, Harassment, and Human Rights Training	Raising awareness of compliance, harassment, and human rights	All employees	100%

Scope: DOCOMO

Thorough Compliance

Compliance Training

NTT DOCOMO conducts position-specific compliance training every year to raise awareness among corporate officers and employees (including temporary staff). We hold follow-up discussions with employees after web-based training and periodically publish magazines to summarize our initiatives on compliance, human rights, and harassment, and the Compliance Report on our intranet site. This provides opportunities for employees to share their thoughts on these topics, supporting our ongoing effort to raise overall awareness. To mitigate workplace harassment risks, we provide training for newly appointed managers, guiding them away from

Preventing Bribery

The NTT DOCOMO Group, which operates business in Japan and overseas, is subject to the anti-bribery and anti-corruption laws of a number of countries, including Japan's own Unfair Competition Prevention Act, which prohibits activities such as providing unjust gains to foreign public officials, and the Foreign Corrupt Practices Act in the U.S.

To ensure thorough legal compliance, NTT DOCOMO established the Guidelines on the Prevention of Bribery of Foreign Public Officials, based on the NTT DOCOMO Group Code of Ethics, which seeks to unequivocally prevent illegal behavior. The guidelines have since been revised as needed, and current content reflects the implementation of the Bribery Act in the U.K., when regulations were tightened in other



countries, and when the penalties for bribery of foreign public officials were tightened and expanded under the 2024 revision to the Unfair Competition Prevention Act, which came into force on April 1, 2024.

In addition, the NTT Group created an Anti-Bribery Handbook as a tool for raising employee awareness. It contains basic knowledge and examples of bribery and facilitation payments. It also covers broader themes than the Guidelines on the Prevention of Bribery of Foreign Public Officials.

The NTT DOCOMO Group distributed the Japanese and English language versions of this handbook to its Group companies in Japan and overseas to raise awareness. We intend to further strengthen our anti-bribery efforts among Group companies by encouraging them to construct compliance systems based on the Code of Ethics, guidelines, and the handbook while taking into account each company's business and the legislation of the country in which they are located, and by holding training and organizing study groups to educate employees.

Reports on bribery in Japan and overseas are handled by divisions with management responsibilities in each operating company, based on the policies established by NTT DOCOMO's head office. In particular, for overseas joint ventures, a clear reporting line has been established between DOCOMO's head office and the holding company of the joint venture to centrally manage and share information concerning bribery, thereby strengthening compliance across the Group.

In fiscal 2024, no legislative measures have been taken against us on bribery or facilitation payments and no charges were indicted.

Through the Compliance Hotline, established as part of our consultation and reporting mechanism, appropriate action is taken when incidents of suspected bribery or other misconduct occur. In addition, internal audits are periodically conducted as part of our risk management initiatives to ensure legal compliance and maintain ethical standards.

[□ P. 140 Consultation and Reporting Mechanism](#)

[□ P. 151 Risk Management Mechanism](#)

Guidelines on the Prevention of Bribery of Foreign Public Officials (Established October 2010)

Introduction: Prohibition Against Acts of Bribery of Foreign Public Officials

Introduction: Prohibition Against Acts of Bribery of Foreign Public Officials

1. Foreign Public Officials to Whom the Guidelines Apply

- (1) Officials of central and local governments of foreign countries
- (2) Staff engaged in administrative work at institutions related to a foreign government
- (3) Staff engaged in administrative work at public corporations of foreign countries
- (4) Staff with official responsibilities at international organizations
- (5) Persons working under consignment from foreign governments and other entities
- (6) Political parties of foreign countries and their staff members, or candidates for public office
- (7) Agents or family members of persons defined under 1. to 6., or persons with equivalent status

2. Prohibited Acts and Criteria for Judgment

- (1) Prohibited acts
- (2) Timing
- (3) Substance, monetary
- (4) Frequency
- (5) Transparency
- (6) Compliance with local laws

3. Examples

- (1) Dinners and parties
- (2) Gifts
- (3) Golf excursions
- (4) Trips amount, and other aspects
- (5) Others

4. Selection of Consultants, Consignees and Other Persons Entrusted with Contacting and Negotiating with Foreign Public Officials

5. Individual Cases of Entertaining and Presenting Gifts

6. FAQ

Prevention of Excessive Donations and Entertainment

The NTT DOCOMO Group established the Code of Hospitality for Outside Parties in 2021 and, based on these regulations, formulated the Manual on Hospitality for Outside Parties in 2023. In 2023, necessary measures were implemented to maintain ethical standards.

With regard to the handling of gifts, the Group ensures strict adherence to ethical standards and full legal and regulatory compliance. Employees also must be especially careful not to violate laws such as the National Public Service Ethics Code, Unfair Competition Prevention Act, and Foreign Corrupt Practices Act when making payments to government officials. Prior to the season for sending summer gifts (ochugen) and winter gifts (oseibo), all Group employees are reminded to maintain ethical standards and comply with all relevant laws and regulations when sending such gifts, and never to make any inappropriate payments to government officials or other public employees, as part of our efforts to prevent bribery and maintain full legal and regulatory compliance.

With respect to political contributions, we make it absolutely clear that they must be given through legitimate channels in accordance with the NTT Group Code of Ethics and Guidelines for Sustainability in Supply Chain, and in compliance with the Political Funds Control Law in Japan. In fiscal 2024, NTT DOCOMO made political contributions totaling 12 million yen in Japan.

► Number of Legislative Measures and Exposures to Bribery and Facilitation Payments (Japan and Overseas)

	FY2021	FY2022	FY2023	FY2024
Number of legislative measures/exposures	0	0	0	0

Scope: DOCOMO and 11 subsidiaries with specific functional responsibilities



► **DOCOMO's Political Contributions**

(million yen)

	FY2021	FY2022	FY2023	FY2024
Political contributions (telecommunications administration)	10	10	12	12

Promotion of Fair Competition

The Fair Trade Commission and Ministry of Internal Affairs and Communication formulated the Guidelines for Promotion of Competition in the Telecommunications Business Field, which reflects their declared policies on the manner in which the Antimonopoly Act and Telecommunications Business Law are respectively applied, to encourage new market entrants and develop a fair and unrestricted competitive environment.

In addition to the Antimonopoly Act, which constitutes the common rules of competition, NTT DOCOMO is governed by articles of the Telecommunications Business Law, intended to promote fair competition in accordance with the special nature of the telecommunications business. To ensure compliance with these laws and regulations, we continue to conduct annual web-based training and other learning opportunities for fair competition. We have also summarized practical considerations on fair competition into a manual that is made available for employees via the corporate intranet. Moreover, when internally considering launching a new service, we seek to rigorously comply with laws and regulations by having the Corporate Strategy and Planning Department confirm that we are not in violation of the Telecommunications Business Law.

In August 2016, the Fair Trade Commission presented its views on issues concerning competitive policy in the mobile phone market, prompting the industry to review practices that may be problematic under the Antimonopoly Act. In June 2021, It published another report, which pointed out the following new competition policy issues: promoting competition through the entry of new Mobile Network Operators (MNOs); ensuring a competitive environment for Mobile Virtual Network

Operators (MVNOs); issues related to sales agents (evaluation system, pricing of mobile phone devices, handling of original products). In addition, in response to emerging concerns over the extreme discount sales of mobile phone handsets (smartphones), the Fair Trade Commission published a report in February 2023 on an “emergency fact-finding investigation on the low-priced sales of mobile phone handsets.” This report points out that selling mobile phone handsets (smartphones) at a price that would result in a loss may raise concerns under the Antimonopoly Law, setting too high a target for MNP acquisition for sales agents that may drive them to unjustifiably low price sales, and also setting sales targets without adequate consultation with sales agents, which could constitute an abuse of a supervisory position.

Furthermore, the Ministry of Internal Affairs and Communications has announced its “Plan for Promoting Competition in the Mobile Telecommunications Market” in line with the “Comprehensive Economic Measures to Break Completely Away from Deflation,” approved by the Cabinet in November 2023. The plan is intended to create an environment conducive to competition based on rates and services and implements measures based on the following points: (1) achieving reasonable rates and high- quality services, (2) accelerating access to ways for easily changing carriers, and (3) promoting the development of a fair competitive environment between carriers.

Keeping in line with these new developments, the NTT DOCOMO Group will steadfastly comply with laws, regulations, and guidelines and strive to provide pricing and services based on user needs.

Avoiding Conflicts of Interest

Conflicts of interest are regulated by law in many countries from the standpoint of ensuring fairness. DOCOMO has established internal rules for avoiding such conflicts in accordance with Japan’s Companies Act and other relevant regulations. For example, when a member of senior management seeks to engage in a business transaction that could result in a conflict

of interest, the rules require prior approval by the Board of Directors if the member is a director or by the director responsible for corporate ethics if the member is not a director. The director in question is not permitted to take part in decisions made by the Board of Directors. By operating under this mechanism, we seek to ensure the fairness of business transactions and avoid conflicts of interest.

Measures against Money Laundering, Terrorist Financing, and Proliferation Financing

In recent years, measures against money laundering, terrorist financing, and proliferation financing have become increasingly important in the international community, and in Japan measures are urgently being implemented as well. NTT DOCOMO and its Group companies consider this a key management concern in preventing any criminal use of our business operations and the abuse of our financial services by criminal organizations. We are committed to maintaining and developing a sound financial system and are working to prevent money laundering and other crimes throughout our business activities in accordance with the Act on Prevention of Transfer of Criminal Proceeds and the Guidelines for Anti-Money Laundering and Combating the Financing of Terrorism, published by the Financial Services Agency and the Ministry of Economy, Trade and Industry.

[Measures against Money Laundering, Terrorist Financing, and Proliferation Financing \(in Japanese only\)](#)

Refusing All Connections to Anti-Social Groups

NTT DOCOMO established the DOCOMO Group’s Basic Policy on Anti-Social Forces and have consistently upheld that policy over a number of years to refuse all connections to anti-social groups. Since October 2011, when the Organized Crime Exclusion Ordinances were enforced across all 47 prefectures, we revised our policy and took steps such as adding exclusionary provisions to outsourcing and all other standard business agreement forms to reinforce our stance against such organizations.

[DOCOMO Group’s Basic Policy on Anti-Social Forces \(in Japanese only\)](#)



Supply Chain

Basic Philosophy

In line with our Basic Procurement Policy, the NTT DOCOMO Group regards suppliers as key business partners. We are committed to sustainable procurement that takes into account various social responsibilities, including fair trade.

NTT Group's Procurement Policies

The NTT Group has established the NTT Group Global Sustainability Charter and promotes initiatives to realize a sustainable society by pursuing both corporate growth and solutions to social issues. With the increasing globalization and complexity of today's supply chains, responding appropriately to global issues, such as human rights, ethics, the environment, disasters and pandemics, and security, has become a key challenge for us.

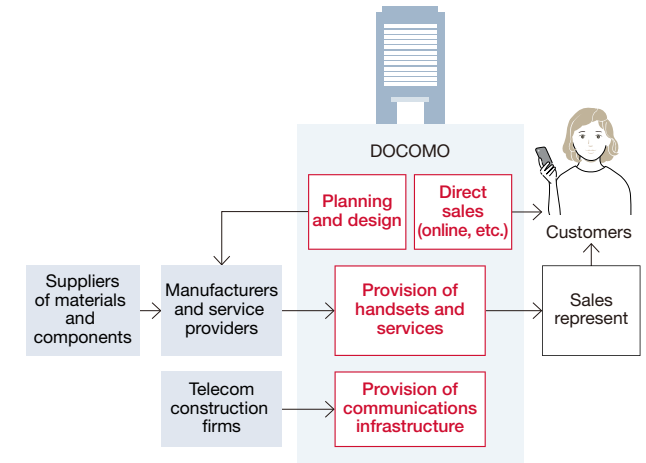
In response to various challenges, the NTT Group is committed to deepening mutual understanding and building relationships of trust with all suppliers in the supply chain, and it will continue to work with them to build and maintain safe and secure supply chains under high ethical standards, including the protection of human rights and the global environment. This is how we will independently and proactively contribute to the realization of a sustainable society. Accordingly, DOCOMO conducts procurement based on the following Procurement Policies.

NTT Group's Procurement Policies

1. NTT DOCOMO will strive to provide competitive opportunities with fairness to both domestic and foreign suppliers, and to build mutual trust and understanding.
2. NTT DOCOMO will conduct economically rational procurement of competitive goods and services that meet its business needs, deciding suppliers based on quality, price, delivery times, and stable supply in a comprehensive manner.
3. NTT DOCOMO will contribute to realizing a sustainable society by doing procurement with an emphasis on human rights, the environment, safety, and other critical issues, in compliance with laws and social norms.

NTT DOCOMO's Supply Chain

NTT DOCOMO believes that building and maintaining safe and secure supply chains with a diverse range of suppliers is essential for continuing its business activities. Its business model is supported by business partners, including suppliers and construction firms related to telecommunications facilities and equipment, communication device manufacturers, and sales representatives such as docomo Shops. We effectively manage our supply chain throughout our business, including suppliers.



Supply Chain Management

NTT DOCOMO's basic stance on sustainable supply chain management is to work together with its suppliers. Under the leadership of the senior executive vice president responsible for procurement, we are working on these initiatives by setting and monitoring the progress of key performance indicators (KPIs).

[P. 24 Metrics and Targets](#)

Promotion of Sustainability Procurement

The NTT Group published the NTT Group Guidelines for Sustainability in Supply Chain and the NTT Group Green Procurement Standards to promote efforts to realize a sustainable society.

The NTT DOCOMO Group formulated the NTT DOCOMO Group Guidelines for Sustainability in Supply Chain, based on NTT DOCOMO's Basic Procurement Policies, and by requesting suppliers to adhere to these guidelines, we aim to realize a sustainable supply chain and ultimately a sustainable society.



Our guidelines set forth requirements for suppliers (code of conduct) and items that require compliance in the seven sustainability-related areas: human rights and labor, health and safety, the environment, fair trade and ethics, quality and safety, information security, and business continuity planning. We request that suppliers with whom we have direct dealings incorporate into their contracts a clause requiring compliance with the contents of these guidelines. We also require our direct suppliers to communicate the content of these guidelines to their upstream supply chain members and promote their compliance with the guidelines through contracts.

In April 2022, we established the NTT DOCOMO Green Procurement Standards, which require suppliers to commit to reducing environmental impact, particularly in the development and operation of an environmental management system, reduction of greenhouse gas emissions, promotion of resource recycling, and preservation of biodiversity.

- [NTT Group Guidelines for Sustainability in Supply Chain](#)
- [NTT Group Green Procurement Standards](#)
- [NTT DOCOMO Guidelines for Sustainability in Supply Chain](#)
- [NTT DOCOMO Green Procurement Standards](#)

Implementation of the Guidelines and Monitoring System

Within the wide-ranging suppliers in our supply chain, NTT DOCOMO, NTT DOCOMO Business, and NTT DOCOMO Solutions define suppliers that provide a sizable quantity of products or supply irreplaceable products as tier-one suppliers who are particularly important for sustainable supply chain management. We request these suppliers to submit a self-assessment questionnaire (SAQ) via the EcoVadis platform, which conducts corporate sustainability assessments in the areas of the environment, labor and human rights, ethics, and sustainable procurement, to confirm the status of their compliance with the guidelines. In fiscal 2024, we requested submissions from 35 companies, and 27 companies (77%)

responded. In line with the establishment of the NTT DOCOMO Guidelines for Sustainability in Supply Chain, we have been conducting audits of our suppliers and requiring them to disclose necessary information to verify the status of their compliance with the guidelines. Any supplier deemed insufficient under the guidelines' requirements will be asked to make improvements and, depending on the status of their efforts, will be subject to further action, including a review of the business relationship. When entering into a business contract, we request that the supplier include a clause to confirm their agreement and ensure compliance with these guidelines.

As part of our efforts to reduce environmental impact, we are taking steps to choose environmentally sound suppliers and products based on the NTT DOCOMO Green Procurement Standards. When evaluating suppliers and their products, we request that they complete the Environmental Activity Survey Sheet, the Response to the Identification of Chemical Substances Contained in Products, and the Substances Subject to RoHS, Non-use Certificate.

[P. 31 Green Procurement](#)

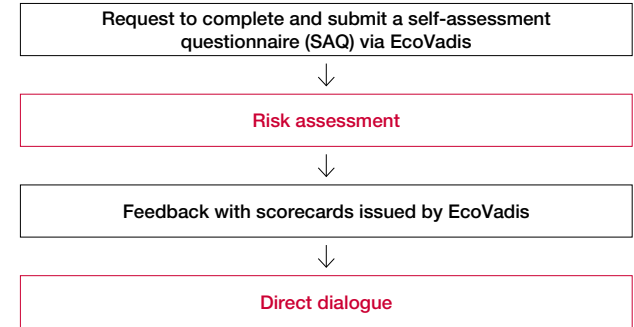
Supply Chain Risk Assessment

NTT DOCOMO, NTT DOCOMO Business, and NTT DOCOMO Solutions conduct supplier risk assessments by distributing and collecting a self-assessment questionnaire (SAQ) via the EcoVadis platform and carrying out sustainability evaluations. Based on the EcoVadis scorecards, we hold direct dialogues with suppliers that require improvement, and we work on remedial actions through mutual understanding and agreement. In fiscal 2024, we held direct dialogue with 11 suppliers.

Implementation Rate of Direct Dialogue with Suppliers Requiring Improvement (FY2024)

100% (11 companies)

Supplier Risk Assessment Process



Supplier Risk Assessment Process

Some of the minerals produced in the Democratic Republic of the Congo and other conflict areas are believed to be funding armed groups involved in crimes against humanity, thereby contributing to conflicts or abusing human rights. In order to meet its procurement-related social responsibilities, the NTT DOCOMO Group works with its suppliers to ensure supply chain transparency and promote initiatives to eliminate the use of conflict minerals* that would fund the activities of armed groups.

In response to supplier requests, we conduct an annual survey of our tier-one suppliers regarding the country of origin of conflict minerals in their products, using the Conflict Minerals Reporting Template. We have achieved a 100% response rate, both at the supplier and product level.

*Minerals such as tantalum, tin, gold, tungsten, which could potentially be a source of funding for armed groups

[NTT DOCOMO Group's Approach to Conflict Minerals](#)

Enhancing Procurement Skills

When negotiating with suppliers to procure goods, we are required to achieve continuous, stable procurement through equal, fair, and transparent transactions. Therefore,



NTT DOCOMO annually conduct training for all employees on internal procurement regulations and procurement processes to improve internal procurement skills. We also periodically conduct training for NTT DOCOMO's employees in charge of procurement* to ensure that these initiatives are appropriately carried out. In fiscal 2024, we conducted procurement training sessions with a 100% participation rate (26 participants).

*Employees of the Materials Department are defined as those in charge of procurement.

Communication with Suppliers

In line with its Declaration of Partnership Building, NTT DOCOMO promotes collaboration, coexistence, and co-prosperity across the supply chain and with business partners that create new value. We strive to build mutual trust with suppliers by actively sharing requests and suggestions through opinion exchanges and other opportunities for dialogue. Through these efforts, we will continue to strengthen our collaboration with suppliers to ensure a stable supply of competitive, high-quality products.

[Declaration of Partnership Building \(in Japanese only\)](#)

► Supplier Engagement Activities

Method	Description
Briefings and discussions	<p>We explain the environment surrounding DOCOMO and also exchange views with suppliers to ensure they can continue to provide us with a stable supply of competitive high-quality products.</p> <ul style="list-style-type: none"> • Procurement briefings for telecommunications equipment suppliers • Briefings on the NTT DOCOMO Guidelines for Sustainability in Supply Chain and NTT DOCOMO Green Procurement Standards • Briefings on the NTT Group's Net-Zero initiatives • Briefings on the NTT Group's sustainability assessment • Briefings on the addition to the business agreement of a clause concerning compliance with the Guidelines for Sustainability in Supply Chain
Direct dialogues	<p>We hold direct dialogues with suppliers to verify their answers to the self-assessment questionnaire (SAQ) provided via EcoVadis. For new suppliers, we conduct assessments using factory survey forms that include an item confirming health and safety, and also check the status of their BCP.</p>
Business agreement that includes a clause concerning compliance with the guidelines	<p>The revised business agreement has been implemented since October 2022.</p>

Relationship with Telecom Construction Firms

NTT DOCOMO offers its services through telecommunications facilities built by telecom construction firms. We thus have appropriate contracts with those that we work with as partners to ensure we have established a telecommunications environment that meets the needs of our customers.

Specifically, telecom construction companies carry out design and construction work, while we sign contracts in accordance with the Construction Business Act for all construction processes undertaken by the telecom construction firms, including design and construction work, and we establish our own standards and assign construction supervisors. Since telecom construction often involves working in high locations, we conduct rigorous assessments with a strong focus on safety, visit construction sites to check safety, and remotely monitor safety by installing more IP cameras. Furthermore, we present certificates of gratitude to telecom construction firms that have operated without accidents throughout the year.

DOCOMO maintains good relationships with partner companies by creating periodic opportunities for mutual communication, including policy briefing sessions, kickoff meetings, and presentations for improvement activities. We also seek Value Engineering Proposals on a quarterly basis and ask telecom construction firms to submit new technical proposals. Excellent proposals are presented with an award from the president. In fiscal 2024, 46 proposals were adopted.

Fair and Appropriate Agency Agreements

NTT DOCOMO provides products and services to customers through docomo Shops and other sales representatives such as large-scale retailers. As of the end of March 2025, there were 2,049 docomo shops, which are specialty stores for NTT DOCOMO's products and services, nationwide and about 3,000 other shops, including large-scale retailers dealing with products and services of multiple carriers, and dealerships for our NTT DOCOMO products. NTT DOCOMO signs appropriate contracts, which include articles related to sustainability, with its partner dealerships so that we can provide services through them that meet the needs of our customers.



Support for docomo Shop Staff

Improving Operational Efficiency and Service Quality

In fiscal 2024, we upgraded our service terminals to streamline reception operations, focusing on reducing the time required for registration procedures. In fiscal 2025, we will continue to improve service quality and customer convenience by leveraging IT to further raise operational efficiency.

Creating a Favorable Workplace and Providing Incentives

Staff at docomo Shops represent the frontline of our relationship with customers. While they are employed by the respective sales representatives, NTT DOCOMO also provides the necessary education and training, support for store management, and incentives for staff to acquire qualifications. In addition, staff from the specialized divisions at the NTT DOCOMO head office and branch offices regularly conduct inspections to exchange ideas and provide guidance on establishing a sound working environment.

We offer financial incentives for docomo Shops. As for non-financial incentives, we offer awards for long-term employment to secure the stable employment of sales staff as a means of maintaining their motivation

Continuous Training and Qualification System

NTT DOCOMO positions docomo Shops as the total life support bases that make our customers' lives more convenient, fun, and affluent. To maintain and improve the quality of support service, docomo Shop staff are acquiring product and service knowledge and improving their overall customer service skills through various training opportunities and the skills qualification system. As of the end of May 2025, about 95% of our staff are qualified, with about 19% holding top level qualifications. By having these staff take the lead in

continuously proposing new value and providing even greater customer satisfaction than before, we aim to enable docomo Shops to function as total life support bases and achieve the highest level of CX. By attending trainings and obtaining qualifications, our staff improve their skills and also gain opportunities to realize personal growth. DOCOMO also pays allowances linked to each qualification so that staff can remain highly motivated.

> Qualifications and Skills of Shop Staff

Qualifications	Skills
Front Specialist	Responsible for on-site operations
Grand Meister	Assesses customer needs and presents optimal proposals
Meister	Presents optimal proposals
Pre-Meister	Offers a friendly first response
Technical Advisor	Has an abundance of technical knowledge and is capable of promptly analyzing and responding to a wide range of queries, including those related to malfunctions

Customer Service Contest for docomo Shop Staff

The docomo Shop Staff Customer Service Contest Meister of the Year National Competition, annually gathers docomo Shop staff from across Japan. The contest offers an opportunity for staff to demonstrate the customer service skills required in their daily operations, such as recommending products and services that best fit the needs of each customer and presenting an accurate knowledge of mobile phones and services. The competition was launched nationwide in fiscal 2009. The fiscal 2024 contest, held for the first time in five years, marked its 12th edition.



docomo Shop Staff Customer Service Contest
—Competing and Refining Our Service Skills Together

Universal Design at docomo Shops

DOCOMO Hearty Style “Enhance Customer Support”

Following the concept of DOCOMO Hearty Style [P. 79](#), NTT DOCOMO is creating barrier-free docomo Shops. Specifically, we are removing stairs at shop entrances, securing clear floor space to accommodate wheelchairs, installing wheelchair accessible counters and restrooms, designating dedicated parking spaces for people with disabilities, and working on other improvements. As of the end of March 2025, over 90% of all docomo Shops in Japan were equipped with barrier-free entrances and ample indoor space, with over 80% offering barrier-free restrooms and dedicated parking spaces for people with disabilities.



▶ Barrier-free entrances	1,996 shops
▶ Clear floor space for wheelchairs	1,993 shops
▶ Dedicated parking spaces for people with disabilities	1,753 shops
▶ Wheelchair-accessible restrooms	1,863 shops

For people with impaired hearing, we installed sign language support videophones at 1,007 docomo Shops (as of the end of March 2025) to facilitate communication between shop staff and customers by remote video interpreting. Many shops also have communication boards. In particular, Hearty Plaza Marunouchi considers universal design through services such as on-site sign language staff, support for getting to and from the nearest station, and smartphone classes for those with visual or hearing impairments. We also provide customers the opportunity to experience the latest models of the Raku Raku PHONE series at our shops.

In addition to making shops barrier-free and providing tools, we are working to ensure that personnel thoroughly understand the associated concepts. For example, all new docomo Shop staff attend the New Shop Staff Training, with about 4,553 employees nationwide participating in fiscal 2024.

[☞ Hearty Plaza Marunouchi \(in Japanese only\)](#)

Reinforcing Disaster Preparedness at docomo Shops

Following the Hokkaido Eastern Iburi Earthquake in September 2018, which caused power outages across Hokkaido, NTT DOCOMO opened its office building and



Free charging station

docomo Shops to public in the disaster-stricken area to offer free mobile phone charging services. We had installed solar power generation systems as a disaster preparedness measure in 297 docomo Shops as of the end of March 2025 to strengthen our ability to provide free charging services during power outages.

[☞ P. 93 NTT DOCOMO's Disaster Preparedness](#)

Corporate Governance

Basic Philosophy

In accordance with our corporate philosophy of “creating a new world of communications culture,” NTT DOCOMO intends to contribute to the realization of a rich and vigorous society and to improve our corporate value to earn greater trust and recognition from, shareholders, and customers. To maximize corporate value while meeting the expectations of our various stakeholders, including shareholders, customers, employees, partners, and local communities, we recognize that it is essential to ensure effective corporate governance by strengthening our governance structure.

Overview of the Corporate Governance Structure

NTT DOCOMO is a company with an audit and supervisory committee for the purpose of enriching management strategy discussions at the Board of Directors’ meeting and strengthening the driving force of our management as a

business corporation. The monitoring function of the Board of Directors is strengthened by appointing and encouraging outside directors to share their abilities and insights and offer support through prior, in-depth briefings on proposals to be discussed at the Board of Directors meetings and by periodically meeting with representative directors and internal officers. With respect to the auditing function, Audit and Supervisory Committee members (including full-time members) attend key meetings such as the Board of Directors, while the Audit and Supervisory Committee conducts effective audits over directors’ execution of duties in coordination with the independent auditor and Internal Audit Department, to consistently ensure sound management.

In addition, we continued to maintain the executive officer system (24 men and 7 women) to clearly delineate the roles of business execution and monitoring and to better reinforce business execution functions. This system supports a nimble responsiveness to changes in the operating environment. The ratio of female directors as of the end of June 2025 is 25.5%

▶ Composition of Board of Directors (as of June 30, 2025)

Category	Make	Female	Total
Directors who are not Audit and Supervisory Committee members	8 (including 1 outside director)	3 (including 2 outside director)	11
Directors who are Audit and Supervisory Committee members	3 (including 2 outside directors)	2 (including 1 outside director)	5
Executive officers (for reference)	24	7	31



Audit Department in principle once a month. They also promote mutual understanding and information-sharing with the auditors of subsidiaries. In addition, they maintain close contact with the Internal Audit Department and independent auditor by regularly sharing information on audit plans and results to ensure the effectiveness of audits.

Fortifying Internal Control Systems and Auditing their Effectiveness

The Board of Directors has established the Basic Policy on Fortifying Internal Control Systems. Under the policy, we are developing systems to ensure thorough legal compliance and effective, efficient business operations. In addition, the Company's Internal Audit Department liaises with the internal audit teams in each NTT DOCOMO Group company to conduct regular internal audits and provide support based on the audit plan, including evaluations of the effectiveness of the internal control system. The audit results are reported to management, and improvement proposals are made as necessary to minimize risks and increase corporate value for the entire NTT DOCOMO Group.

[P. 151 Risk Management Mechanism](#)

Board Member Compensation

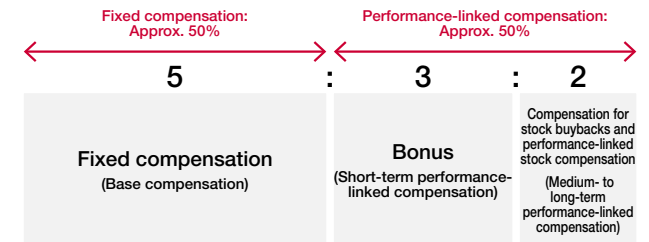
NTT DOCOMO's compensation of individual directors (excluding outside directors and Audit and Supervisory Committee members) consists of a monthly salary (base compensation) and a bonus (compensation related to performance over the short term), NTT stock buybacks through the Board Members Shareholding Association and performance-linked stock compensation (compensation related to performance over the medium to long term). The composition ratio of compensation in a case where standard business results are achieved is roughly as follows: For the president and CEO: Fixed compensation : Short-term performance-linked compensation : Medium- to long-term performance-linked compensation = 40% : 35% : 25%. For

other directors: Fixed compensation : Short-term performance-linked compensation : Medium- to long-term performance-linked compensation = 50% : 30% : 20%.

- Monthly salary (base compensation): The base salary is a fixed compensation paid monthly on the basis of the scope of each Member of the Board's roles and responsibilities.
- Bonus (short-term performance-linked compensation): The bonus is paid in June each year, taking into account the business results for the current fiscal year. The amount of this bonus is based on the achievement of indicators based on targets in the Medium-Term Management Strategy.
- NTT stock buybacks and performance-linked stock compensation (medium- to long-term performance-linked compensation): Members of the Board purchase NTT shares through the Board Members Shareholding Association using stock acquisition compensation paid monthly. Shares purchased are to be held for their entire term of office.

For the performance-linked stock compensation, a trust established by NTT is used. The members of the Board are granted points corresponding to their role in June each year and a performance-linked coefficient corresponding to the level of achievement of the performance indicator is determined in June of the year following the final fiscal year of NTT Group's medium-term management strategy, and the number of shares to be granted to each Member of the Board is calculated by multiplying the performance-linked coefficient by the number of points that has been accumulated. The granted shares are delivered to the Member of the Board upon retirement.

In order to maintain a high level of independence, compensation of outside directors consists of a monthly fixed compensation only, and is not linked to the business results. Compensation of Audit & Supervisory Board members is determined by resolution of the Audit & Supervisory Board and consists of a monthly salary only, for the same reasons as those cited above with respect to outside directors.



Note: Breakdown of individual compensation for directors (excluding outside directors and Audit and Supervisor Committee members). The approximate composition of compensation for the president and CEO is as follows: fixed compensation : short-term performance-linked compensation : medium- to long-term performance-linked compensation = 40% : 35% : 25%.

Evaluation of the Effectiveness of the Board of Directors

With the goal of sustainably enhancing corporate value, the Company analyzes and evaluates the effectiveness of the Board of Directors to make continuous improvement, by identifying key issues or points to address related to the responsibilities, operation, composition, and other aspects of the Board of Directors.

Results and Future Operating Policy

NTT DOCOMO confirmed that the duties, operation, and composition of NTT DOCOMO's Board of Directors are appropriate and that the board is functioning effectively. To regularly verify the progress of implementing the medium-term management strategies, the allocation of management resources, and our responses to changes in the business environment.

Appointment and Dismissal of Directors and Developing Successors

With regard to the appointment and dismissal of directors, NTT DOCOMO provide details to the parent company and outside directors prior to the Board of Directors' meeting to gather appropriate advice. Nominees are then presented to the board meeting for approval, followed by deliberation



at the shareholders meeting. The Audit and Supervisor Committee verifies that candidates for directors who are not members of the Audit and Supervisory Committee are selected in accordance with the appropriate process, and it properly exercises its right to express its opinion on appointments, compensation, and other matters. Future managerial candidates are given opportunities to deepen their knowledge of and experience in NTT DOCOMO management by participating in the Board of Directors' meetings or Management Committee meetings and engaging in decision-making of material management matters through their responsibilities as directors with executive authority or executive officer. They also develop the skills required for NTT DOCOMO's management through various training programs for officers.

Board Diversity

A key NTT DOCOMO management objective is to promote diversity in the workforce by establishing a working environment that allows individuals from diverse backgrounds and values to effectively demonstrate their abilities. Accordingly, the Board of Directors consists of members that take into account the overall balance of expertise and diversity including gender and internationality. As of June 30, 2025 the membership of the Board of Directors includes five women.

Members of the Board of Directors are appointed while taking into account the balance and diversity in terms of their areas of expertise, and they are chosen from candidates with broad perspectives and experiences that contribute to the development of the DOCOMO Group with excellent management capabilities and leadership skills as well as sound business sense and enthusiasm.

With respect to members of the Audit and Supervisory Committee who are directors, individuals are appointed who can be expected to perform proper audits based on their professional expertise and knowledge of finance and

accounting as well as paying due consideration to the same management capabilities.

Corporate Advisor and Senior Advisor System

NTT DOCOMO has a Corporate Advisor and Senior Advisor System in place, recognizing that it is advantageous to corporate management to have individuals with a wealth of experience and insights to take on external activities under NTT DOCOMO's name, as this contributes to strengthening the NTT DOCOMO Group's presence in the market.

Matters to be entrusted to corporate advisors and consultants are defined in Article 19 of the NTT DOCOMO's Articles of Incorporation. Corporate advisors take on the role of answering questions from the president regarding overall management, and senior advisors answer questions regarding certain business operations. In addition, they mainly undertake external activities requested by the president and do not wield influence over the current management team beyond what is expected from them, nor do they engage in managerial judgements.

Addressing Sustainability

NTT DOCOMO incorporates sustainability into its management approach while also considering management strategies and the demands and changes posed by society. It strives to continuously strengthen its sustainability and contribute to the creation of a sustainable society in accordance with its policy of conducting business operations aligned with ESG initiatives.

Key risks such as those impacting sustainability are comprehensively managed by and reported to the Board of Directors' meetings. Social and environmental risks are dealt with by the Sustainability Management Committee to ensure the implementation of plan, do, check, act (PDCA) cycles for sustainability efforts.

The Sustainability Management Committee, chaired by the president and CEO, is composed of senior executive

vice presidents, members of the Audit and Supervisory Committee who are directors, executive vice presidents, and the heads of relevant departments. Since fiscal 2023, the senior executive vice presidents of NTT DOCOMO Business and NTT DOCOMO Solutions have joined the committee as members, and executive general managers of regional offices also joined starting in fiscal 2024. Significant matters discussed by the Sustainability Management Committee are reported to the Board of Directors and/or Management Committee.

As for suggestions and requests from stakeholders to NTT DOCOMO, information is identified and gathered by the department responsible for each type of stakeholder, and dialogues are set up as needed.

Risk Management

Basic Philosophy

NTT DOCOMO strives to strengthen risk management under the basic policy of identifying and responding to business risks as quickly as possible. We define risks as situations that may adversely affect the NTT DOCOMO Group's credibility or corporate image or lead to a reduction of revenues and/or increase of costs, such as natural and human-caused disasters, including natural calamities and power shortages, inadequate handling of confidential business information, including personal information, changes in the market environment surrounding the telecommunications industry, and intensifying competition from other businesses. We are making our best efforts to prevent and mitigate such risks.



Risk Management Mechanism

NTT DOCOMO, in accordance with our Risk Management Principles, regularly identifies business risks. The Business Risk Management Committee, chaired by the senior executive vice president, identifies risks that require Company-wide management and discusses management policies for the identified risks, which are then deliberated on and approved by the Management Committee. Appropriate efforts are made to prevent risks from materializing and to prepare to quickly respond should they occur.

We implement sound risk management for aspects related to information management and compliance by establishing internal regulations and encouraging collaboration between relevant committees. Furthermore, the Internal Audit Department conducts an audit to monitor the status of our response to risk and follow-up investigations as necessary. Environmental and social aspects, including compliance with laws and regulations, have been incorporated into our operational regulations and are also subject to an internal audit for monitoring.

Risk Identification Process

NTT DOCOMO annually reviews potential risks and methods for managing them to keep abreast of changes in the social environment. The first step in identifying risks is considering both internal and external circumstances in order to incorporate social change into an assessment of the current status and thereby extract new potential risks. After evaluation and analysis based on the level of impact and frequency of occurrence, we determine Company-wide risks through a materiality assessment.

Risk Management Operations

NTT DOCOMO, in accordance with its Risk Management Principles, convenes the Business Risk Management

Committee, chaired by the Senior Executive Vice President, to identify and evaluate risks, and discuss management policies for them. These policies are subsequently deliberated on and approved by the Management Committee, and then reported to the Board of Directors. Measures taken to prevent or mitigate identified risks are regularly monitored by the Internal Audit Department to ensure that those controls have been properly implemented across the Company in accordance with management policies for those risks. Each year, we update our Company-wide risks to reflect social trends, which allows us to deal with emerging risks as a preventive measure. While these risks are appropriately addressed through Company-wide efforts, risks related to individual operations are also handled appropriately by each division.

Risks Relating to Subsidiaries

Risks relating to subsidiaries are handled in accordance with risk management principles. Risks inherent to the NTT DOCOMO Group are managed accordingly, and subsidiaries conduct risk management based on their respective size and business.

Business Continuity Plan (BCP)

Strengthening BCP Measures

Our key responsibility as a communications network operator is to secure communications networks when a disaster strikes. In order to ensure the continuity of operations or, in the event that services are lost during a disaster, to quickly restore

operations to working order, NTT DOCOMO has protocols for each department as outlined in its Disaster Preparedness Manual for maintaining operations. The manual is updated as needed to incorporate past experiences, including lessons learned from the Great East Japan Earthquake, and thereby strengthen our preparedness for ensuring business continuity.

- [Civilian Protection Operation Plan \(in Japanese only\)](#)
- [Disaster Management Operation Plan \(in Japanese only\)](#)
- [Counter-Pandemic Operation Plan \(in Japanese only\)](#)

Ensuring Employee Safety and Securing Communications in Times of Disaster

NTT DOCOMO has been taking a number of steps to secure telecommunications services in the event of a major disaster. In addition to developing disaster-resistant communications networks (deploying large- and medium-zone base stations and implementing other measures), we conduct annual general disaster drills as well as drills designed to meet specialized regional needs. Furthermore, as a designated public institution under the Basic Act on Disaster Control Measures, we participate in joint disaster prevention drills with the national government, local governments, and the Self Defense Forces. We are enhancing the safety and reliability of our networks through these activities [P. 93](#).

In addition, we regularly conduct drills using NTT DOCOMO's own employee safety confirmation system to provide protection for our employees and their families and to construct systems for promptly confirming safety and restoring communications networks.