

LR Independent Assurance Statement

Relating to Rakuten Corporation's Environmental and Social Data for the calendar year 2019

This Assurance Statement has been prepared for Rakuten Corporation in accordance with our contract but is intended for the readers of this report.

Terms of engagement

Lloyd's Register Quality Assurance Limited (LR) was commissioned by Rakuten Corporation ("the Company") to provide independent assurance on its environmental and social data within its Corporate Report 2019 and Rakuten group ESG data book 2019 ("the report") for the year 2019, that is, from 1 January to 31 December 2019, against the assurance criteria below to a limited level of assurance and at the materiality of the professional judgement of the verifier using ISAE 3000 and ISO 14064 - 3 for greenhouse gas ("GHG") data.

Our assurance engagement covered the Company's and its subsidiaries' operations and activities in Japan and overseas and specifically the following requirements:¹

- Verifying conformance with the Company's reporting methodologies
- Evaluating the accuracy and reliability of data for the selected indicators listed below:²

Environmental indicator³

- Energy consumption volume (in MWh equivalent)
- Scope 1 GHG emissions (tonnes CO₂e)
- Scope 2 GHG emissions (market and location-based) (tonnes CO₂e)
- Scope 3 GHG emissions (Category 1-8, 11, 12) (tonnes CO₂e)⁴
- Water consumption volume (m³)
- Waste disposal volume (tonnes)⁵

Social indicator⁶

- Average length of service
- Employees with disabilities employment rate
- Total No. of fatalities
- Lost-time injury frequency rate
- Occupational disease frequency rate for employees

Our assurance engagement excluded the data and information of the Company's suppliers, contractors and any third-parties mentioned in the report.

LR's responsibility is only to the Company. LR disclaims any liability or responsibility to others as explained in the end footnote. The Company's responsibility is for collecting, aggregating, analysing and presenting all the data and information within the report and for maintaining effective internal controls over the systems from which the report is derived. Ultimately, the report has been approved by, and remains the responsibility of the Company.

LR's Opinion

Based on LR's approach nothing has come to our attention that would cause us to believe that the Company has not, in all material respects:

- Met the requirements above
- Disclosed accurate and reliable environmental and social data

The opinion expressed is formed on the basis of a limited level of assurance and at the materiality of the professional judgement of the verifier.

¹ Offices which have over 39 regular employees are covered.

² LR undertook a limited assurance engagement of the environmental and social data marked with "✓" within Corporate Report 2019 and Rakuten group ESG data book 2019.

³ GHG quantification is subject to inherent uncertainty.

⁴ Coverage of Scope 3 GHG emissions calculation is the Company only. Its subsidiaries in Japan and overseas are not included.

⁵ Coverage of waste disposal volume calculation is limited to Rakuten Crimson House, Rakuten Rise Office, RFC Ichikawa I, RFC Ichikawa II, RFC Ichikawa III, RFC Kawanishi, RFC Nagareyama, RFC Hirakata, Rakuten Direct Logistics, Inc., Rakuten Baseball, Inc. (home stadium), Rakuten Vissel Kobe, Inc. (home stadium), Rakuten General Insurance Co., Ltd.(Office), Rakuten Card Co., Ltd.(Office), Rakuten Mobile, Inc.(Office) only.

⁶ Coverage of Average length of service, Total number of fatalities, Lost-time injury frequency rate, Occupational disease frequency rate for employees are the Company only. Coverage of Employees with disabilities Employment Rate is the Company, Rakuten Socio Business, Inc., and Rakuten Communications Corp. Employees with disabilities Employment Rate is as of end December 2019.

Note: The extent of evidence-gathering for a limited assurance engagement is less than for a reasonable assurance engagement. Limited assurance engagements focus on aggregated data rather than physically checking source data at sites. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

LR's approach

LR's assurance engagements are carried out in accordance with ISAE 3000 and ISO 14064 - 3 for GHG data. The following tasks though were undertaken as part of the evidence gathering process for this assurance engagement:

- Auditing the Company's data management systems to confirm that there were no significant errors, omissions or mis-statements in the report. We did this by reviewing the effectiveness of data handling procedures, instructions and systems, including those for internal verification;
- Interviewing with key people responsible for compiling the data and drafting the report;
- Sampling datasets and tracing activity data back to aggregated levels;
- Verifying the historical GHG emissions, other environmental and social data and records for the calendar year 2019; and
- By implementing the Company's "No Visitor" Policy due to the global infection spread of COVID-19, conducting the remote verification of Rakuten Vissel Kobe and Sagamihara Center of Rakuten direct logistics to assess whether the data management systems have been effectively implemented via e-mail and Zoom.

Observations

The company should standardise reporting formats and share the same understanding on the aim of reporting to further improve accuracy and completeness of activity data provided by the sites.

LR's standards, competence and independence

LR implements and maintains a comprehensive management system that meets accreditation requirements for ISO 14065 *Greenhouse gases – Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition* and ISO/IEC 17021-1 *Conformity assessment – Requirements for bodies providing audit and certification of management systems – Part 1: Requirements* that are at least as demanding as the requirements of the International Standard on Quality Control 1 and comply with the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants.

LR ensures the selection of appropriately qualified individuals based on their qualifications, training and experience. The outcome of all verification and certification assessments is then internally reviewed by senior management to ensure that the approach applied is rigorous and transparent.

This is the only work undertaken by LR for the Company and as such does not compromise our independence or impartiality.

Signed



Norihiko Kinoshita

LR Lead Verifier

On behalf of Lloyd's Register Quality Assurance Limited

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LR reference: YKA00000765

Dated: 9 July 2020

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