

LR Independent Assurance Statement

Relating to Rakuten Corporation's Environmental Data within its Corporate Report 2018 for the fiscal year 2018

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 data within its Corporate Report 2018 ("the report") for the fiscal year 2018, that is, from 1 January to 31 December 2018, 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:

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

*GHG Emission data*¹

- Energy consumption volume (in mega watt-hour equivalent)
- Scope 1 GHG emissions (tonnes CO₂e)
- Scope 2 GHG emissions (market and location-based) (tonnes CO₂)²
- Scope 3 GHG emissions (Category 1-8, 11, 12) (tonnes CO₂e)³

Other environmental indicators

- Water consumption volume (m³)
- Waste disposal volume (tonnes)⁴

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 Company has not, in all material respects:

- Met the requirements above
- Disclosed accurate and reliable performance 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.

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.

¹ GHG quantification is subject to inherent uncertainty.

² Carbon offset claims for fiscal year 2018 are excluded from this assurance engagement.

³ Limited to the Company-associated activities only; activities of subsidiaries in Japan and overseas are excluded.

⁴ Limited to activities associated with Rakuten Head Office, RFC Ichikawa I, RFC Ichikawa II, RFC Ichikawa III, RFC Kawanishi, Rakuten Baseball, Inc. (home stadium), Rakuten Vissel Kobe, Inc. (home stadium) only.

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 and other environmental data and records for the fiscal year 2018; and
- Visiting Rakuten Super Logistics RFC Ichikawa I and Rakuten Baseball, Inc. to assess whether the data management systems have been effectively implemented.

Observations

The company should standardise reporting formats and share the same understanding on reporting objectives 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 Company and as such does not compromise our independence or impartiality.

Signed

Dated: 29 July 2019



Koji Tagami

LR Lead Verifier

On behalf of Lloyd's Register Quality Assurance Limited

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LR reference: YKA00000765

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