

Rakuten Group Human Rights Policy

Human rights are fundamental and universal rights inherent to all human beings regardless of their origin, background, or any other status. Guided by the [Rakuten Group Code of Ethics](#), we respect the human rights of all our stakeholders throughout our operations, including Group employees, regardless of their employment status, customers, and business partners, including joint-ventures, contractors, suppliers of goods and services, investees, and any third party that engages in a business relationship with the Rakuten Group. As we provide a wide range of online and offline services all over the world, we are fully aware that ensuring and respecting the human rights of all stakeholders involved and impacted by our business activities is challenging yet crucial.

The requirements related to human rights apply to all employees of the Rakuten Group regardless of their employment status, including executives, permanent staff, and contract staff.

Respect for internationally recognized human rights standards

We strive to make positive contributions to the advancement of human rights and uphold all recognized international standards on human rights, including the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; and the ILO Declaration on Fundamental Principles and Rights at Work. We are committed to applying the United Nations Guiding Principles on Business and Human Rights.

Privacy, access to information, and freedom of expression

We are committed to respecting and protecting our stakeholders' rights to privacy and freedom of expression, to hold opinions without interference, and to access information and ideas of all kinds. For more details on our privacy policy for employees, please read the Rakuten Group Guidelines and Instructions within RGR (Rakuten Group Regulations).

Ethical use of technology

Although we recognize the potential adverse impacts that technology may cause in our rapidly changing environment, we strive to leverage the power of technology to promote human rights. We strive to ensure that technology is developed and used ethically in ways that respect human rights and that help empower people and society.

Non-discrimination and equal opportunities

We are committed to providing equal opportunities for all employees. We do not discriminate based on ethnicity, nationality, gender, marriage history, presence or absence of children, religious or political beliefs, age, disabilities, sexual orientation, gender identity, or any other factors.

Zero tolerance for inhumane treatment

We ensure that our stakeholders are treated with dignity. We prohibit physical, verbal or any other form of harassment or abuse, including those of a sexual nature, whether between individuals of different genders or of

the same gender, as well as physical, verbal or any other form of harassment or abuse in which the harasser or abuser take advantage of his or her post, position, or the category of the employee(s) being harassed or abused. The company also prohibits any harassment related to pregnancy, childbirth, childcare or family-care leave, or any other factors.

Fair wages

We are committed to complying with all applicable laws and regulations of the countries and regions where we do business concerning wages. In addition, we strive to meet appropriate wage levels that satisfy the basic needs of employees.

Working hours

We are committed to complying with all applicable laws and regulations of the countries and regions where we do business concerning working hours. In addition, we strive to reduce excessive working hours.

Safety and health

We consider the health and safety of all Rakuten stakeholders to be of the utmost importance. To ensure a healthy and safe working environment for employees and prevent occupational illness and injuries, we strive to create action plans for maintaining and improving employee health and safety, investigate causes of workplace accidents and illness, and prevent their recurrence. In addition, we are committed to making continuous efforts to offer safe products and services to our customers.

Prohibition of child labor

We do not make use of child labor in our business operations and have zero tolerance for the use of child labor by any third party that engages in business relations with the Rakuten Group. Child labor refers to the exploitation of children who are under 16 years of age or the applicable minimum legal age, whichever is higher, through any form of work that deprives them of their childhood, hinders them from receiving universal education, or is mentally, physically, socially, or morally harmful.

Prohibition of forced labor

We will never force anyone into labor through any means, including but not limited to confinement, restraint, slave labor, coerced overtime work, or human trafficking. In addition, we have zero tolerance for the use of forced labor by any third party that engages in business relations with the Rakuten Group.

Human rights due diligence

Regarding human rights, in order to identify and minimize potential risks, to mitigate actual impact in our business activities, and to set priority areas, we strive to conduct assessments covering our existing operations, supply chains, and business relationships, as well as new investments, activities, and relationships prior to major decisions and changes in our businesses.

Stakeholder engagement

We are committed to promoting human rights through active multi-stakeholder engagement. To ensure the human rights of all individuals involved in our operations, we strive to collaborate and engage with both affected and potentially affected stakeholders, other companies, civil society, academics, and governments.

Grievance mechanisms

In order to detect and resolve human rights disputes appropriately, we have implemented confidential whistleblowing mechanisms for the handling of voluntary reports from Rakuten Group employees on illegal acts, violations of company rules and regulations, including this human rights policy, fraudulent acts, or other ethical misconduct. The Rakuten Group is committed to investigating, addressing, and responding to any concerns received and taking appropriate action in response to any violation reported and identified.