

Rakuten Mobile Sustainable Procurement Guidelines

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Rakuten Mobile, Inc.
Finance and Accounting Management Division
Procurement Department

Introduction

The Rakuten Group aims to contribute to the realization of a sustainable society through its entire value chain.

In advancing sustainability across the supply chains that support the provision of our products and services, our suppliers play an important role. Having a shared understanding of what sustainability represents and working together in addressing related challenges are essential, which explains the formulation of the “Rakuten Group Sustainable Procurement Instruction”

In line of this instruction, Rakuten Mobile has adopted the “Rakuten Mobile Sustainable Procurement Guidelines” (hereinafter “Guidelines”), which outline the actions that suppliers are expected to take and the matters that they are requested to manage.

The suppliers of Rakuten Mobile are to agree with the principles stated by the “[Rakuten Group Code of Ethics](#)”, to understand and implement these Guidelines, and to cooperate with the Rakuten Group to realize a sustainable supply chain.

■ **Scope of application**

These Guidelines apply to suppliers when engaging in procurement activities with Rakuten Mobile.

■ **Definition of suppliers**

The term "supplier" means any company, entity, business partner, agent, intermediary, contractor, distributor, and other third parties that provides any service and/or product to Rakuten Mobile.

■ **Definition of procurement activities**

Procurement activities refer to the purchase or commission of tangible assets, intangible assets, and services that are necessary to the provision of products or services to end users.

- Materials: raw materials, components, devices, printouts, etc.
- Intangible: digital content, software, systems, etc.
- Services: human resources, including temporary workers, consulting, development, etc.

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I. Fair Trade and Ethics

(I-1) Prohibition of corruption and bribery

Maintain sound and proper relations with political and administrative authorities, and prohibit bribery and illegal political contributions.

Bribery refers to the provision of money, entertainment, gifts, and other benefits and conveniences to public officials and other similar parties (hereinafter referred to as "public officials") in order to receive some benefit in connection with business, such as the permission, acquisition or maintenance of transactions, or the acquisition of non-public information for example. It also includes the provision of entertainment and gifts to public officials beyond social courtesy even if no specific business benefit is expected.

Illegal political contributions include political contributions that seek some sort of benefit in connection with business, such as the permission, acquisition or maintenance of transactions, or the acquisition of non-public information for example. It also includes political contributions that do not follow formal procedures.

(I-2) Prohibition of abuse of dominant bargaining position

Do not abuse dominant bargaining position to harm suppliers.

Abuse of a dominant bargaining position refers to unilaterally deciding or modifying the terms and conditions of transactions with suppliers, etc. or imposing unreasonable demands or obligations from the viewpoint of purchasers or contractors.

Procurement transactions shall be conducted in good faith, in a fair and equitable manner based on contracts, etc., and shall not engage in any conduct that abuses a dominant bargaining position. In countries with laws and regulations governing the abuse of dominant bargaining positions, comply with those laws and regulations. (e.g. the Subcontract Act in Japan)

(I-3) Prohibition of offer and receipt of inappropriate benefits

Do not offer or receive inappropriate benefits in relation to stakeholders.

Offer and receipt of inappropriate benefits shall mean the following:

Acts of bribery, such as offering or receiving gifts, prizes of goods or money from customers beyond the scope provided by laws and regulations, or offering or receiving money, goods, or entertainment that goes beyond the scope of social courtesy.

Acts of providing inappropriate benefits to antisocial forces (criminal organizations, terrorist organizations, etc.) that adversely affect social order and sound business activities.

Insider trading in which the shares of a company are traded based on important, non-public information relating to the business of the company.

(I-4) Prohibition of anti-competitive practices

Refrain from acts that impede fair, transparent and free competition.

Anti-competitive practices refer to an agreement with other companies in the same industry on the price, quantity, and sales territory of products and services (cartel), or an agreement with other bidders on the winning bidder or bidding price (bid-rigging).

Acquiring and using other companies' trade secrets in an unlawful manner and making false or misleading representations about other companies' products are also anti-competitive practices.

(I-5) Provision of accurate information on products and services

Provide consumers and customers with accurate information about products and services.

Accurate information includes, for example:

- The specifications, quality, and handling methods for products and services shall be accurate.
- Information on substances contained in parts and materials used in products must be accurate.
- No misrepresentation or misleading representation of products or services, including in catalogs or advertisements, no slander of other companies or individuals, and no infringement of rights shall be included.

(I-6) Respect for intellectual property

Do not infringe on the intellectual property rights of others.

Intellectual property means patent rights, utility model rights, design rights, trademark rights, copyrights, trade secrets, etc.

When developing, producing, selling, or supplying products or services, the Company shall sufficiently investigate intellectual property rights of third parties in advance. Unless justified, unauthorized use of intellectual property of a third party is an infringement of intellectual property rights.

Illegal reproduction of computer software and other works constitutes an infringement of intellectual property rights.

The illegal acquisition and use of a third party's trade secret is also an infringement of intellectual property rights.

(I-7) Appropriate export control

Establish a clear control system for export of technology and goods regulated by laws and regulations, and implement appropriate export procedures.

Technologies and goods regulated by laws and regulations refer to parts, products, technologies, facilities, software, etc. regulated by laws and regulations based on international agreements (Wassenaar Arrangements, etc.).

In some cases, it may be necessary to obtain permission from competent authorities for export.

(I-8) Information disclosure

Proactively provide and disclose information to stakeholders, regardless of whether disclosure is required by laws and regulations.

Information to be provided and disclosed to stakeholders refers to the content of business activities, financial status, business performance, and risk information (e.g., damage caused by a major disaster, adverse effects on the environment and society, the discovery of serious violations of laws and regulations, etc.).

The disclosure of important risk information to customers on a case-by-case basis is also an example of proactive provision of information.

(I-9) Prevention and early detection of inappropriate practices

Conduct activities to prevent inappropriate practices, and establish systems for early detection and response.

Activities to prevent inappropriate practices include employee awareness and training programs, but also the creation workplaces with an atmosphere of openness.

Systems for early detection and response to inappropriate practices include the following: establishment of internal and external contact points for reporting inappropriate practices in order to enable early detection by the management; protection of the confidentiality of whistleblowers; prompt response to any inappropriate practice and feedback regarding investigation results to the whistleblower as appropriate.

II. Information Security

(II-1) Defense against cyberattacks

Adopt countermeasure against cyberattacks to prevent harm to the company and others.

Cyberattacks are actions that make use of targeted e-mails for example to infect with malware or guide to malicious sites, and that cause damage by the acquisition of trade secrets, such as personal information, customer information, business partner information and other confidential information, or by the encryption of important files.

After obtaining customer or business partner information, attackers may expand the target of their attacks. Damage is thus not limited to the company.

The devices targeted by cyberattacks are not only conventional PCs and servers, but also industrial systems and IoT devices (Internet of Things), which shall be the object of countermeasures too. In the event of a cyberattack, it is also important to develop plans for prompt recovery.

(II-2) Prevention of leakage of personal information

Properly manage and protect personal information of customers, third parties, and company employees.

Personal information means information concerning a living individual that can identify the individual specifically, such as their name, date of birth or other description. (it includes information that enables the identification of a specific individual in combination with other information)

Appropriate management refers to the establishment and operation of a general management system for personal information, including the formulation of rules and policies to be observed by employees, etc., and the planning, implementation, audit, and review of plans in accordance therewith.

Appropriate protection shall mean that personal information shall not be obtained, used, disclosed, or divulged improperly.

(II-3) Prevention of leakage of confidential information of customers and third parties

Properly manage and protect confidential information received from customers and third parties.

Confidential information generally refers to information disclosed through documents (including data information recorded electromagnetically and optically) that is agreed to be confidential, or information disclosed orally after notifying that it is confidential.

Appropriate management refers to the establishment and operation of an overall management system for confidential information, including the formulation of rules and policies to be observed by employees, etc., and the planning, implementation, audit, and review of plans in accordance therewith.

Appropriate protection shall mean that confidential information shall not be obtained, used, disclosed, or divulged improperly.

III. Quality and Safety

(III-1) Product safety

When responsible for product design, comply with product safety standards established by the laws and regulations of each country.

Suppliers must design their products in such ways that ensure sufficient product safety and distribute them with consideration of their responsibilities as a manufacturer. In addition, products shall not only comply with safety-related laws and regulations but shall also have regular safety features.

In Japan, product-safety-related laws and regulations include the Electrical Appliance and Material Safety Law, the Consumer Product Safety Law, and the Household Product Quality Labeling Law. Overseas safety standards include UL, BSI, and CSA.

Ensuring product safety includes managing traceability (material, components, process history, etc.) and responding rapidly to issues.

(III-2) Quality management system

Establish and operate a quality management system.

Quality management system refers to the overall management mechanism for promoting quality assurance activities, including organizational structure, activity planning, division of responsibilities, practices, procedures, processes, and management resources. The term "quality assurance activities" here refers to the creation, implementation, achievement, review, and maintenance of quality policies, and the continual improvement of quality assurance through PDCA cycles.

Typical quality management systems include the ISO 9000 family, ISO/TS 16949, and ISO 13485.

IV. Environment

(IV-1) Management of chemical substances in products

Manage chemical substances as specified by laws and regulations for all products.

Managing chemical substances for all products means, in addition to the prohibition of certain chemical substances as specified by laws and regulations, the compliance with labeling obligations and the implementation of tests and evaluations, as required.

(IV-2) Management of chemical substances used in manufacturing processes

Manage chemical substances as specified by the laws and regulations of the country where products are manufactured.

Managing chemical substances in the manufacturing processes refers to managing chemical substances that must not be contained in products, as well as monitoring the amount of chemical substances released into external environments, reporting to governments, and making efforts in order to reduce the amount of chemical substances emitted.

(IV-3) Environmental management system

Establish and operate an environmental management system.

The environmental management system refers to the overall management system for promoting environmental activities, including organizational structure, activity planning, division of responsibilities, practices, procedures, processes, and management resources. The term "environmental activities" here refers to the creation of environmental policies and to the implementation, achievement, review, and maintenance of initiatives in accordance with these policies. It also refers to the continual improvement of environmental conservation through PDCA cycles.

The standard ISO14001 is one example of environmental management system, which can be verified by a third party.

(IV-4) Minimization of environmental impact (wastewater, sludge, exhaust air, etc.)

Comply with the laws and regulations of the country regarding wastewater, sludge, exhaust air, etc., and make further improvements based on voluntary standards as necessary.

Voluntary standards are targets to reduce environmental impact beyond the levels prescribed by laws and regulations. In addition to preventing pollution, improvement activities include, for example, improvement

of monitoring methods, control methods, and treatment methods for wastewater, sludge, and exhaust, and the reduction of related effluents.

(IV-5) Environmental license / Administrative approval

Obtain approval and authorization from public administrations when necessary, in accordance with the laws and regulations of the country of jurisdiction, and submit the required management reports to the administrations.

In Japan, the obligation to appoint a manager who has obtained certain qualifications is stipulated by laws and regulations. For example, the Waste Disposal and Public Cleansing Law requires a Specially Controlled Industrial Waste Manager.

Depending on the nature of the business and the location of the factory, it may be necessary to obtain the approval or permission of public administrations concerning environmental impact assessment, hazardous material handling facilities, etc.

(IV-6) Effective use of resources and energy (3R)

Set voluntary targets to conserve resources and energy, and strive to use them efficiently.

Resource conservation refers to the efficient use of resources. It includes the reduction of the use of materials in products and reduction of waste by promoting the use of recycled materials and components. Energy conservation refers to the rational use of heat, electricity, and other energies. Energy savings enable the effective use of fuel resources such as oil, natural gas, coal, and coke.

3R refers to Reduce, Reuse and Recycle.

(IV-7) Reduction of greenhouse gas emissions

Set voluntary targets to reduce greenhouse gas emissions and continuously reduce emissions.

Several types of greenhouse gases exist, but the Kyoto Protocol lists six of them in particular: carbon dioxide, methane, nitrous oxide, HFC, PFC, and SF6.

Reduction activities include setting voluntary reduction targets for these six types of greenhouse gases, formulating plans, and steadily implementing them.

(IV-8) Waste reduction

Set voluntary targets for the reduction of final waste and continuously reduce waste generation.

Final waste refers to waste that requires landfill or incineration.

Reduction activities include setting voluntary reduction targets for final waste, formulating plans, and steadily implementing them.

(IV-9) Disclosure of environmental conservation activities

Disclose the results of environmental activities as necessary.

The results of environmental activities include measures taken for environmental conservation, emissions into the air, wastewater, soil, etc., amount of resources used, amount of waste generated, etc., as well as the negative impacts of business sites on the environment.

In order to compile those results on a regular basis, an organization and person in charge of environmental conservation activities shall be designed, and the recording of indicators, of the achievement level of targets, and of other important matters shall be done continuously.

Disclosure methods include the publication of environmental reports and reporting to interested parties as necessary.

V. Human Rights and Labor

(V-1) Prohibition of forced labor

Do not make employees work against their will and do not allow any form of forced labor.

Forced labor refers to any form of work that is not voluntary, and includes the following examples: forced labor against employee's will, compulsory work performed for the payment of debts, and slave labor and human trafficking.

The absence of right to leave employment voluntarily and freely, as well as the confiscation of identity cards, passports and work permits by the employer, are also forms of forced labor.

(V-2) Prohibition of child labor

Do not employ children under the minimum working age and do not allow them to work in a way that impairs their development.

Child labor generally refers to the employment of people under the minimum working age defined in the International Labor Organization (ILO) Conventions and Recommendations, and to the neglect of the protection of young workers.

In Japan, for example, employing people under the age of 15 or violating laws and regulations for the protection of young workers constitutes child labor. Legal and regulatory restrictions protecting young workers from work that could harm their health, safety and morals include for example the restrictions on night work and dangerous work. Outside of Japan too, a violation of the obligation to not employ and to protect people under the minimum working age stipulated by the laws and regulations of the country in which they are located constitutes a case of child labor.

In countries where the minimum working age is not defined by the law, the ILO Minimum Age Convention and Recommendation shall be used. (Minimum age for employment: 15 years; ILO Convention 138)

(V-3) Prohibition of inhumane treatment

Respect the human rights of employees and prohibit abuse, harassment, and other harsh or inhumane treatment.

Inhumane treatment includes but not limited to abuse, physical punishment, sexual harassment, and power harassment.

(V-4) Prohibition of discrimination

Eliminate discrimination in recruitment and employment, and strive to realize equality of opportunity and treatment.

Discrimination refers to differences in opportunities and treatment, in recruitment, promotion, compensation, or access to training, based on factors other than the rational elements of the employee's ability, aptitude, and performances.

Factors of discrimination include, for example, ethnicity, nationality, geographic origin, skin color, age, gender identity, sexual orientation, disability, religion, political opinion, union participation, or marital status.

It is also considered discriminatory if medical examination or pregnancy test results determine equality of opportunity or treatment.

(V-5) Appropriate wages

Ensure adequate wage levels to meet employees' basic needs

Wages that meet the basic needs of employees are appropriate wage levels that enable employees to lead decent lives in compliance with all applicable national and international wage laws and labor standards.

(V-6) Working hours

Properly manage working hours, work breaks, and holidays of employees so that legal limits are not exceeded

Proper management refers to the following:

- The prescribed annual working days shall not exceed legal limits.
- Working hours per week (excluding cases of emergency) including overtime shall not exceed legal limits.
- At least one day off per week shall be granted.
- The right to annual paid holidays shall be granted as stated by the law.

(V-7) Freedom of association and collective bargaining

Respect the right to freedom of association of employees, as a means of consultation between management and labor, to negotiate working conditions such as wage levels.

To respect employees' right to freedom of association means to take into consideration their rights to organize, to join a labor union in accordance with the law, and to protest, without any reprisal, threat, or harassment.

(V-8) Responsible mineral procurement

Avoid the procurement and use of raw materials, components, and products that contain minerals mined in an irresponsible manner in conflict areas.

Tantalum, tin, tungsten, and gold (hereinafter referred to as "conflict minerals") originating in the Democratic Republic of the Congo and neighboring countries are important sources of funding for armed groups, and are connected to serious problems, like conflicts and human rights violations. We avoid the procurement and use of raw materials, components, and products containing these conflict minerals. In order to procure minerals in a responsible manner, we collaborate, and in the case where concerns are raised, we take action to cease the procurement and use of conflicts minerals.

VI. Health and Safety

(VI-1) Safety measures for machinery and equipment

Take appropriate safety measures for machinery and equipment used in the company.

Appropriate safety measures refer to controls to prevent accidents or health problems occurring during work, and include for example the following: adoption of safety mechanisms called fail-safe, fool-proof, and interlocks; installation of safety devices and protective wall; periodic inspection and maintenance of machinery.

(VI-2) Workplace safety

Assess the risks related to workplace safety and ensure safety with appropriate design, technology and control measures.

Occupational safety risks are the potential risks of accidents and health hazards during work, and include for example risks related to electricity and other energies, fire, vehicles, slippery surfaces, falling objects. Appropriate design, technology and control measures include, for example, monitoring dangerous places with sensors, shutting off the power sources of machinery and equipment (lockout), placing tags that clearly prohibit the operation of certain devices during power shutdown (tagout), and providing protective equipment such as safety glasses, safety hats and gloves.

(VI-3) Workplace hygiene

Assess the workplace exposure to harmful organisms and chemicals as well as to noise and strong odors, and take appropriate measures.

Substances harmful to the human body include soot, vapor, mist, dust, toxic substances, radiations, and substances that can cause chronic diseases (lead, asbestos, etc.). Noise and strong odors are also considered to be harmful to the human body if they are significant. Appropriate measures include, for example, the identification and assessment of points of direct contact, the establishment and operation of management standards, appropriate training and the provision of protective equipment to employees.

(VI-4) Occupational accidents and diseases

Understand the status of occupational accidents and diseases and take appropriate measures.

Appropriate measures refer to systems and measures that promote reporting by employees, classify and record accidents and diseases, provide treatment as necessary, investigate accidents and diseases, implement corrective measures to eliminate causes, and promote employees' return to the workplace. (including participation in workers' accident compensation insurance, etc.) It also includes the implementation of necessary administrative procedures as required by laws and regulations.

(VI-5) Emergency response

In order to protect workers' lives and health, prepare emergency response measures for potential accidents, and ensure that all employees are fully aware of these measures.

Emergency response measures include, for example, emergency reporting, notification to employees, clarification of evacuation procedures, establishment of evacuation facilities, stockpiling of emergency medical supplies, installation of fire detection systems, installation of fire control systems, securing of external communication means, and development of recovery plans. Methods of thoroughly informing employees within the workplace include emergency response education (including evacuation drills) and storage or posting of emergency response procedures in an easily accessible location within the workplace.

(VI-6) Consideration for physical load work

Identify physically burdensome operations and appropriately manage them to prevent casualties and diseases.

Physically stressful tasks include heavy work, such as lifting heavy objects by hand, as well as repetitive and continuous work, such as assembly and data entry, over a long period of time.

Appropriate management includes periodic breaks, provision of work aids, and task sharing and cooperation between workers.

(VI-7) Safety and hygiene of facilities

Ensure the safety and hygiene of facilities (dormitories, cafeterias, toilets, etc.) provided to employees.

Facilities provided to employees include those at work (e.g., toilets, water fountains, locker rooms, cafeterias) and those outside the workplace (e.g., dormitories).

Examples of ensuring safety and hygiene include safe drinking water, fire protection, ventilation, temperature control, emergency escape routes (exits), safe storage of personal belongings, as well as maintaining cleanliness.

(VI-8) Employee health management

Properly manage the health of all employees.

Appropriate health management notably refers to the implementation of health examinations, at least at the level specified by laws and regulations, and the prevention and early detection of diseases of employees. In addition, overwork prevention and mental health must be the object of particular consideration.

VII. Social Contribution

(VII-1) Contribution to society and local communities

Conduct voluntary activities that contribute to the development of international and local communities.

Activities that can contribute to the development of the international and local communities refer to support activities for communities using corporate resources. Such activities usually include the following:

- Social contributions through the use of services and technologies
- Nonmonetary social contributions through the use of facilities and human resources
- Social contributions through monetary donations

Examples of activities include cooperation with local communities in times of disaster, employee volunteer activities, support of NPO/NGO activities, donation activities. Each company is to determine the scope of activities that it can undertake, and to actively contribute to society.

Supplier Hotline

Rakuten Mobile has established a channel for suppliers (hereafter referred to as the “Supplier Hotline”) regarding any violation or potential violation of these Guidelines and others. Refrain from using the Supplier Hotline with any wrongful intention (hereinafter referred to as "Inappropriate Reporting"), such as the reporting of factually incorrect information, defamation, slander, blackmail, or obstruction of business.

How to contact

Contact us through [this form](#). As you may be contacted by Rakuten Mobile for more information regarding the matter, please clearly indicate the name of the organization to which you belong, your name, and e-mail address.

Contact response

- The factual investigation of the reported matter will be conducted by a dedicated team that is not directly involved in the procurement activities of Rakuten Mobile. The matter will be promptly addressed and resolved if corrective measures are required as a result of the investigation.
- The content of the reported matter will be handled in good faith, but in principle, we will not take contact to share the details of the internal response.

Handling of suppliers' contact

- Rakuten Mobile will not treat any of its suppliers disadvantageously for the sole reason of being the subject of a reported matter. This may however differ if the supplier is actually involved in the violation of the Guidelines, or in a case of Inappropriate Reporting.
- Rakuten Mobile will handle with the strictest confidentiality all information regarding the matter, including the content of the report, the name and the contact information of the contact person, and will use it for the purpose of this investigation only.
- The handling of personal information is based on the privacy policy of Rakuten Mobile.
- If you wish to bring changes or corrections to the reported matter, contact information or other, please contact us again using the online form.

Written Pledge

We commit to working with the Rakuten Group to realize a sustainable supply chain, through the understanding and implementation of the Guidelines.

We understand that any breach of the Guidelines shall be immediately corrected, and that if no improvement is seen through corrective measures or if a separate serious breach is found, it may lead to the suspension of business activities with the Rakuten Group.

Date (year/month/day)

Address

Company name

Title of representative

Name and signature of representative
