2024 Modern Slavery Statement

This statement has been published by the Rakuten Group in accordance with Clause 1, Section 54 of the UK Modern Slavery Act of 2015.

Structure, Business and Supply Chain

Founded in 1997 as an online marketplace, the Rakuten Group ("Rakuten") has grown to over 70 businesses around the world with 29,334 Group employees. Driven by the mission of empowering people and society through innovation and entrepreneurship and in line with our vision as a Global Innovation Company, Rakuten is engaged in a broad range of businesses that provide online and offline services, including e-commerce, travel, digital content, fintech, such as credit cards, banking, securities, insurance, electronic money and smartphone app payments, communications, including a mobile carrier service and Open RAN mobile network, NFT and professional sports. Linking these diverse services through a common membership and loyalty program, Rakuten has created one of the world's most unique and robust ecosystems.

By using these services – whether shopping, streaming content, banking, or other – members can earn Rakuten Points, which can then be used to enjoy other services. Currently, over 100 million members are registered in Japan and approximately 1.9 billion globally.

In providing its services and products to end users, Rakuten purchases goods and services from suppliers globally, including the purchasing or commission of tangible assets (raw materials, components, devices, printouts), intangible assets (digital content, software, systems) and services related to human resources (including temporary staff, consulting development). Our procurement activities are especially extensive in providing our physical products such as e-readers, mobile phones, cashless payment terminals and sports team merchandising, and in offering social infrastructures such as mobile networks and logistics. In line with our mission of empowerment, Rakuten strives to work in partnership with all our suppliers, encouraging them to establish policies and practices that mitigate the risk of human rights violations, including modern slavery, occurring in their supply chains.

Governance

The Rakuten Sustainability Department works with teams across the company to develop,

share and implement strategies, engage with stakeholders and monitor progress for human rights protection.

In addition, we founded the Human Rights Subcommittee in 2022, which meets every quarter to implement and promote our human rights strategies. The Human Rights Subcommittee is supported at the management level by the Sustainability Committee on a group-wide basis.

The Subcommittee implements initiatives and serves as a forum for sharing internal human rights issues and tracking global trends. The progress and activities of the Human Rights Subcommittee are reported to the Board of Directors through the Sustainability Committee.

Policies

Rakuten Group Code of Ethics

The Rakuten Group Code of Ethics (the Code) defines the ethical standards to be adopted by all employees while maximizing Rakuten Group's value to shareholders and making positive contributions to society. The second section of the Code, "We respect all people", addresses human rights as follows:

"We respect human rights of all and uphold individual dignity. We are committed to advancing the rights of all stakeholders, including the right to privacy, freedom of expression and a fair and safe working environment. We strive for the promotion of a society free from discrimination, harassment, child labor and forced labor."

The full description of the Code is available here.

Rakuten Group Sustainability Instruction

The Rakuten Group Regulations (RGR) are the set of common rules governing the Group. They consist of policies and instructions that detail the commitments of the company and related rules to be followed by all employees regarding high-level principles such as the ones expressed in the Code.

In 2019, Rakuten adopted the Rakuten Group Sustainability Instruction (the Instruction) as part of the RGR, which is notably a chapter covering human rights. The Instruction states that Rakuten will respect the human rights of all stakeholders throughout its operations, including Group employees, customers and business partners: joint-ventures, contractors, suppliers of goods and services, investees and any third party that engages in a business relationship with Rakuten. The following topics are covered by the Instruction: (1) respect for internationally recognized human rights standards, (2) privacy, access to information and freedom of expression, (3) ethical use of technology, (4) non-discrimination and equal opportunities, (5) zero tolerance for inhumane treatment, (6) fair wages, (7) working hours, (8) safety and health, (9) prohibition of child labor, (10) prohibition of forced labor, (11) respect

for freedom of association and the right to collective bargaining; (12) respect for children's rights; (13) human rights due diligence, (14) stakeholder engagement and (15) grievance mechanisms. The full description of the Policy chapter on human rights is available here.

Rakuten Group Sustainable Procurement Instruction

Our suppliers play an important role in advancing sustainability across the supply chains that support the provision of our products and services as well as items, systems and services used in our daily operations. Having a shared understanding of what sustainability represents is essential in order to work with our suppliers, and we therefore formulated the "Rakuten Group Sustainable Procurement Instruction" in 2020 as part of the RGR.

The Instruction sets expectations for suppliers and is designed to ensure that suppliers conduct business ethically in compliance with laws and regulations while conserving the environment and protecting the health, safety and fair treatment of workers, notably by prohibiting any form of forced labor, including, but not limited to, confinement, restraint, slave labor, coerced overtime work or human trafficking. The full description of the Instruction is available here.

Rakuten Group Sustainable Procurement Code of Conduct for Suppliers

In light of the aforementioned Instruction, we compiled the Rakuten Group Sustainable Procurement Code of Conduct for Suppliers in June 2022 to describe the actions we expect our suppliers to take and manage with their suppliers. This Code of Conduct clearly states the prohibition of child labor and forced labor. Rakuten Group's suppliers are requested to understand the Rakuten Group Code of Ethics, agree to and implement the Code of Conduct. Its full description is available here.

Due diligence and Remediation Processes

To implement Rakuten's Human Rights Policy, we conduct human rights due diligence as per the UN Guiding Principles on Business and Human Rights. Conducting due diligence is an ongoing risk management process to identify, prevent, mitigate and account for how companies address impacts on human rights.

Human Rights Risk Assessment

As part of human rights due diligence, Rakuten conducted a human rights impact assessment in 2020, to identify risks across operations, including supply chains, at a Group level.

The assessment consisted of desktop research that analyzed external reports and standards to map risks potentially associated to Rakuten's service offer, followed by a series of interviews with the top management of each business unit to review initial findings. Internal documents such as policies were also analyzed to evaluate management processes and governance structures.
The project was led by external human rights experts, with cross-industry experience, to ensure reasonable objectivity.
As a result of the assessment, labor standards, forced labor and child labor in the supply chain were identified as Tier 1 risks that should be addressed as a priority, and human trafficking and modern slavery as Tier 2 risks that need to be addressed, although they are relatively low-priority issues. The risk list and priority level may change based on future findings based on stakeholder surveys.
Based on this first risk identification and prioritization, we strive to improve the governance and risk management practices related to human rights, with a particular focus on supply chains. More information on ongoing activities is available here.

Measures Taken to Manage the Identified Risks

Rakuten takes numerous steps to manage human rights risks regarding child and forced labor throughout its operations and businesses. For instance, we confirm the age of each employee when forming an employment contract. In addition, we do not take or hold any travel documents or identity cards of our employees unless required for visa issuance or renewal for foreign employees, or any other HR-related administration purpose.
In parallel with these steps taken within our direct operations, we take several measures in our global supply chain. We aim to identify and resolve issues in our supply chain, reviewing our suppliers' sustainability in high-priority businesses and working to prevent problems before they occur. After identifying targeted suppliers for assessment, a self-assessment questionnaire in line with the Code of Conduct is sent to them. We analyze supplier responses and identify suppliers subject to audit. The audits include interviews with workers and document reviews. Finally, feedback covering the findings over the entire assessment process is shared with suppliers. Suppliers are asked to prepare corrective action plans for the issues identified in the audits, and we follow up on the status of these plans. Considering the large number of suppliers who support the provision of our 70+ services, the promotion of our Code of Conduct and implementation of related initiatives are carried out in stages. ,
The scope of these initiatives covers all suppliers of Rakuten-branded products (products with the Rakuten Group-related logos) and major suppliers with high annual transaction value.

Grievance Mechanisms

Concerning remediation processes, Rakuten has established various contact points to ensure that human rights issues or concerns related to our business activities raised by our stakeholders are known and appropriately addressed. In the event that the company is causing or contributing to adverse human rights impacts, we will take prompt action to remedy the affected parties and prevent a recurrence of similar cases. For our grievance mechanisms, more detailed information is available here.

Training on Modern Slavery and Trafficking

Rakuten is raising employee awareness of human rights through training. Our current training programs cover a variety of human rights issues, including employee human rights (prevention of harassment), the privacy protection of all stakeholders, as well as child and forced labor. We are also committed to supporting our suppliers to implement the Rakuten Group Sustainable Procurement Instruction and the Rakuten Group Sustainable Procurement Code of Conduct for Suppliers through training and capacity building.

As our businesses continue to expand globally, we are aware that our responsibility to address both the positive and adverse impacts of our activities on society, the environment and the economy is also growing. Building on the foundations we have established, we will continue to mitigate any negative impact related to human rights and seize opportunities for their promotion in 2025.

This statement was approved by the Board of Directors of Rakuten Group, Inc.

Signed by:
Hiroshi Mikitani

Signed by Hiroshi Mikitani on 2025-07-17 16:55:08 JST

Representative Director, Chairman, President and CEO
Rakuten Group, Inc.