

DENTSU GROUP CODE OF CONDUCT AND ASSOCIATED GUIDANCE

1. Dentsu Group Code of Conduct

- The Dentsu Group of companies, its officers and employees (“we” or “us”) are committed to protecting the interests of our stakeholders by conducting business to the highest ethical standards. To achieve this commitment, we have established the Dentsu Group Code of Conduct (“**Code of Conduct**”) to serve as our basic principles for conducting business in a socially responsible manner.
- We will comply with the Code of Conduct in all respects. Outside of the Dentsu Group, we will encourage compliance with the Code of Conduct by our business partners.
- We will comply with all national, local and international laws and regulations in all markets in which we conduct business.
- We will respect diversity and will not discriminate on any basis. We will also respect the diverse social and cultural standards of each region in which we conduct business.

1. Corporate governance

- We respect the interests of our stakeholders and will refrain from engaging in activities or taking risks that might harm these interests. Our officers will take responsibility for developing and maintaining appropriate corporate governance systems.

2. Respect for human rights

- We comply with internationally-recognised principles of human rights. We respect the human rights of all people connected with our business activities and will not discriminate on any basis.

3. Ensuring a safe and civilised working environment

- We will ensure that our work places are safe and create a civilised working environment.

4. Environmental protection

- We aim to minimise the impact of our business on the environment and contribute to making society sustainable.

5. Fair business practices

- In carrying out our business we will compete fairly in all markets in which we operate. We will not take part in any form of corrupt business practice, including bribery, transactions where we have conflicting interests and money laundering.

6. Addressing consumer issues

- We will strive to address consumer issues in all markets in which we operate, including by providing appropriate information to consumers and giving due attention to safety and security in all of our activities.

7. Contributing to the community

- We are committed to contributing to the development of all local and global communities in which we operate and to the resolution of social issues in each community.

2. Guidance on the Code of Conduct

The guidance below relates to the principles set out in the Code of Conduct above and contains specific actions required in connection with each principle. This guidance seeks to promote a deeper understanding of each principle to enable each individual in the Dentsu Group to practice the Code of Conduct in a proactive way.

1. Corporate governance

We respect the interests of our stakeholders and will refrain from engaging in activities or taking risks that might harm these interests. Our officers will take responsibility for developing and maintaining appropriate corporate governance systems.

- In order to prioritise the interests of our shareholders, we will disclose all necessary information in a timely and proper manner.
- We will not engage in any securities transaction that might violate insider trading regulations or any activity which could be perceived as insider trading.
- We will implement effective risk management systems which either eliminate the risk of harm to stakeholders or minimise those risks to the extent possible.
- We will follow a system of consultation and reporting to ensure an effective corporate governance structure.
- The officers of the companies in the Dentsu Group will take responsibility in developing and maintaining effective corporate governance systems.

2. Respect for human rights

We comply with internationally-recognised principles of human rights. We respect the human rights of all people connected with our business activities and will not discriminate on any basis.

- We will not discriminate against any person on the basis of race, religion, nationality, ethnic or social origin, gender, gender identity or sexual orientation, physical or mental disability, age, or pregnancy.
- We will not engage in any activity that violates human rights.
- We will not use discriminatory expressions in our advertising or in any of our other products and services.

3. Ensuring a safe and civilised working environment

We will ensure that our work places are safe and create a civilised working environment.

- We will provide a safe, healthy and functioning working environment.
- We will respect the human rights and individuality of each employee. The hiring and promotion of employees will be determined with reference to each individual's ability and merit.
- We will provide active support to foster and develop the careers of female employees.
- We will not tolerate discrimination or harassment of any kind.

4. Environmental protection

We aim to minimise the impact of our business on the environment and contribute to making society sustainable.

- In order to create a sustainable society, we will accurately evaluate the impact of our business activities on the environment. We will endeavour to reduce harm to the environment resulting from our activities.
- In developing and proposing new business activities, we will consider the environment and contribute towards addressing environmental issues.

5. Fair business practices

In carrying out our business we will compete fairly in all markets in which we operate. We will not take part in any form of corrupt business practice, including bribery, transactions where we have conflicting interests and money laundering.

- We will not engage in any act of bribery of any nature.
- We will not engage in any transaction in which we put our own individual interests before the interests of the Dentsu Group or engage in any business transaction that may lead to a conflict of interests.
- We will strive to build a system that shields us from any money laundering activities.
- We will not make requests for gifts or entertainment. We will not accept gifts or entertainment which are inconsistent with international standards or accepted business or social practices.
- We will not participate in any other form of corruption, including fraud, theft, concealment, obstruction of justice or any form of illegal business.
- We will develop and implement effective procurement policies and ensure that we transact with our business partners fairly and transparently.
- We will develop and implement systems to manage and protect all confidential information and personal data, regardless of whether the individuals to whom the personal data relates are in or outside the Dentsu Group.
- We will not use, possess or distribute illegal drugs.

6. Addressing consumer issues

We will strive to address consumer issues in all markets in which we operate, including by providing appropriate information to consumers and giving due attention to safety and security in all of our activities.

- We will provide high quality solutions to business partners and consumers.
- We will provide appropriate and accurate information to the public.

7. Contributing to the community

We are committed to contributing to the development of all local and global communities in which we operate and to the resolution of social issues in each community.

- Through our business activities, we will identify important social issues and work with local communities to address them.
- We will proactively contribute to society, in collaboration with organisations and individuals that are socially responsible and suitably skilled.
- We will respect the cultures and customs of our local communities and contribute to their development.

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