

dentsu

Group Human Rights Policy

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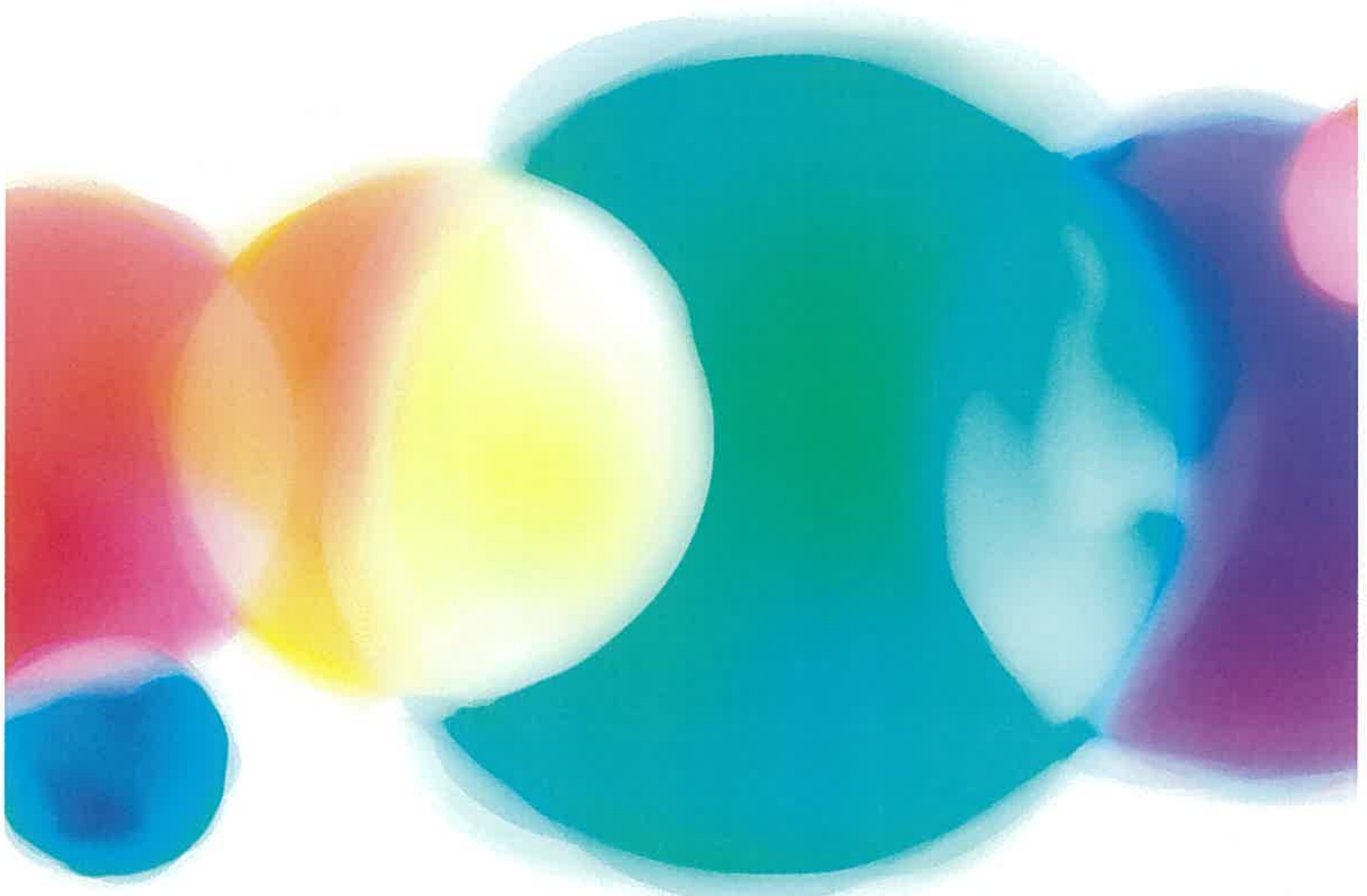
Applicable to: dentsu group inc and its associated companies.

Classification: dentsu external

Purpose: to set out our commitment to embedding respect for human rights across our operations, defining the minimum expectations that everyone working for and with dentsu, must comply with.

Scope: This policy applies to everyone who works at or is engaged by dentsu, including employees and contingent workers.

Policy owner: Global Chief Governance Officer



Group Human Rights Policy

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Executive Summary

Dentsu is committed to respecting human rights by upholding all internationally recognised human rights instruments and the UN Guiding Principles on Business and Human Rights in every aspect of our operations.

Our Group Human Rights Policy is informed by the following international instruments and industry principles:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Social, Economic and Cultural Rights
- United Nations Guiding Principles for Business and Human Rights
- United Nations Global Compact Principles
- International Labor Organisation's Declaration on Fundamental Principles and Rights at Work
- United Nations Convention on the Rights of the Child
- Global Alliance for Responsible Media Principles

Promoting and respecting human rights as core business strategy not only aligns with our vision to be at the forefront of people-centred transformations that shape society, but is also essential to our long-term success.

This policy aims to establish a standardised and consistent approach to managing human rights impacts across the organisation, regardless of geographical location or entity, and covering all individuals and groups who may be impacted by dentsu's activities or through our business relationships and suppliers.

01 Our Risks and Impacts

dentsu identifies key areas where our operations intersect with human rights considerations through ongoing due diligence such as:

- Real time alerts on societal, environmental, and security events,
- Periodical assessment of the risk profiles of our regions/ clusters, or markets (once per year at least),
- Engaging with our suppliers and partners, and
- Annual employee survey.

We also undertake in-depth Human Rights Salience Assessments conducted by expert external stakeholders. This includes interviews with internal and external stakeholders and incorporates affected stakeholder engagement through employee and consumer survey results. The Human Rights Salience Assessment covers all aspects of our global operations, including our supply chain.

The findings of the most recent Human Rights Salience Assessment determined our most salient risks which include:

Our most salient risks include:

- ☐ Equality and non-discrimination
- ☐ Freedom of Thought, Opinion, Religion and Belief, and Freedom of Expression and Access to Information
- ☐ Labor rights and harassment
- ☐ Privacy and data security
- ☐ Child's rights
- ☐ Right to a healthy environment

For further detail on our salient impacts visit <http://www.group.dentsu.com/en/about-us/governance/human-rights.html>

02 Our commitments

Respecting human rights is at the core of our Code of Conduct and is embedded throughout policies and procedures that govern our wider business activities and relationships. (see Section 7) We set out our minimum expectations of our suppliers in our Supplier Code of Conduct.

We comply with all applicable laws and regulations in each country and region in which we operate. Where internationally recognised standards of human rights and national or regional laws and regulations are in conflict, we seek ways to honor the principles of international human rights whilst complying with local legislation.

02.01 Equality and Non-discrimination

- We do not discriminate against any person on the basis of race, religion, nationality, ethnic or social origin, gender, gender identity, sexual orientation, age, pregnancy, neuro-diversity, differing physical or mental abilities, or any other characteristic.
- We uphold the principles of equality and diversity in all aspects of our operations and strive to eliminate the perpetuation of stereotypes and bias throughout our business.

02.02 Freedom of Thought, Opinion, Religion and Belief, and Freedom of Expression and Access to Information

- We are committed to upholding the principles of Freedom of Thought, Opinion, Religion and Belief, and Freedom of Expression and Access to Information, recognising that diversity of perspectives is essential to fostering creativity, innovation, and progress.
- We strive to ensure that our clients' messages are not associated with content that promotes misinformation, disinformation, division or discrimination by

collaborating with global and local industry organizations that focus on safety and responsibility as well as with Ad Tech partners that focus on advertiser protection.

- We work closely with our partners and platforms to promote access to accurate and reliable information, uphold ethical standards and contribute to a safer and more inclusive online environment.

02.03 Labor rights and harassment

- We adhere to international labour standards and local regulations for all employees, contingent workers, visitors, clients, customers, and suppliers and in some circumstances, job applicants, candidates, and ex-employees at dentsu and its associated companies.
- We do not tolerate bullying, discrimination, harassment, and victimisation (i.e., retaliation) in the workplace, and provide anonymous channels for reporting and addressing concerns.
- We have a zero-tolerance approach to all forms of slavery and a commitment to comply with applicable employment and human rights legislation, including relevant child labor laws. We require the same from our partners.
- We respect the right of all workers to form and join a trade union of their choice or bargain collectively without fear of intimidation or reprisal, in accordance with national law.
- In conflict-affected areas, where additional challenges may arise, we will take extra precautions to ensure the safety and security of our employees, working closely with local authorities and stakeholders to mitigate risks and uphold human rights.

02.04 Privacy and Data Security

- We implement appropriate governance and assurance measures to ensure compliance with our data protection obligations. Our approach and commitment to this is enshrined in our Data Protection Principles.
- We see data protection as a fundamental human right, so we treat people and their personal data carefully and with respect so we can be a force for good among the organisations, partners and communities in which we work and live.
- We are committed to being transparent in our handling and processing of personal data at all times in accordance with applicable privacy and data protection laws.
- We adhere to laws and regulations governing the protection of children’s privacy and ensuring that any data collected from or about children is handled fairly and responsibly.

02.05 Child’s Rights

- We acknowledge the special protections afforded to children under international human rights law and commit to respecting and promoting the rights of children in all aspects of our work.

02.06 Right to a healthy environment

- We integrate environmental sustainability into our business practices, minimize our environmental footprint, and advocate for policies and initiatives that protect and preserve the environment for present and future generations.

03 Governance and Due Diligence

Governance

The Group Human Rights Policy is owned by the-Group Chief Governance Officer, who is the executive level sponsor on human rights issues at dentsu.

Our Head of Human Rights are responsible for day-to-day implementation of the Group Human Rights Policy, working closely with our group functions teams to build and embed capacity for the prevention, mitigation and remediation of our human rights impacts.

Human Rights is a standing agenda item at the executive Group Sustainability Committee.

Due Diligence

We conduct human rights due diligence throughout our operations and supply chain to identify, prevent and mitigate risks. Our approach is aligned with the United Nations Guiding Principles on Business and Human Rights. The process includes ongoing risk assessments (see Our Risks and Impacts), policy controls, capacity building and training, tracking performance and transparent disclosure.

We provide training and communication to develop human rights awareness amongst our employees to ensure that this Policy is embedded throughout our business activities.

We are committed to engaging in dialogue and consultation with relevant stakeholders on measures for addressing potential and actual human rights impacts.

We disclose information on progress and outcome of human rights initiatives through our website and relevant reporting tools.

04 Grievance and Remedy

We encourage all employees and external stakeholders to raise any human rights concern. We provide a variety of channels for employees to raise concerns and

grievances including our SpeakUp @dentsu portal which is externally operated, free, anonymous and confidential, and available in all appropriate languages.

Our Supplier Code of Conduct requires suppliers to raise any actual or potential concerns or suspicions of wrongdoing related to their engagement or relationship with dentsu, including any breaches of the Supplier Code, using the Speak Up @ dentsu portal.

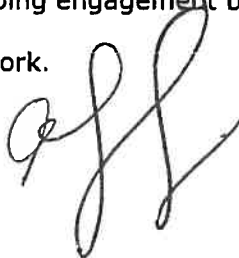
We undertake thorough investigations into concerns raised, and where they are substantiated we take appropriate remedial and corrective actions.

Employees and contingent workers receive annual training on our Code of Conduct, including information on SpeakUp @dentsu.

05 Enactment and Amendment

The Human Rights Policy was developed through cross-functional collaboration and external expert stakeholder consultation and is approved by the Group Management Board. It is reviewed periodically to reflect operational changes, and compliance is tracked via ongoing engagement by our human rights team and through our internal controls framework.

Signed by

A handwritten signature in black ink, consisting of stylized, cursive letters that appear to be 'JH'.

06 Policy Information

6.0 Information

Title	Group Human Rights Policy
Document number	G/O/S/001
Purpose	To set out our commitment to embedding respect for human rights across our operations, defining the minimum expectations that everyone working for and with dentsu, must comply with.
Audience	Regional CEOs, Regional CFOs and Global Communications
Category	Operational
Subcategory	Sustainability
Approving Authority	GMB
Policy Owner	Global Chief Governance Officer and Gbl Chief Financial Officer
Policy Author	Global General Counsel and Group Corporate Secretary and Deputy Global General Counsel
Approval date	11/06/2024
Effective date	Same as Approval date
Review date	Two years

07 Related policy documents

7.0 Related Policy Documents and Supporting Documents

Policy	HR Policy, Speak Up Policy, Physical Security Policy, Procurement Policy, Data Protection and Privacy Policy, Data Protection Principles, Contentious Clients Policy, and Generative AI Policy. Supplier Code of Conduct
Forms	N/A