Dentsu Group Code of Conduct

The Dentsu Group Code of Conduct, the Group’s CSR philosophy, is based on Dentsu’s seven key areas of CSR activity: corporate governance, respect for human rights, ensuring a safe and civilized working environment, environmental protection, fair business practices, addressing consumer issues, and contributing to the community. The code states what all Group managers and employees must do to fulfill their respective responsibilities to society.

The short publication, “Guidance on the Dentsu Group Code of Conduct,” provides specific and detailed actions that management and employees can take to gain a deeper understanding of the seven key areas and voluntarily abide by the requirements.

The Group has stated that it shall comply with the laws and regulations of each market in which it does business, while respecting social norms that reflect a region’s diversity. The publication serves as the Group-wide code of conduct.

Dentsu Group Code of Conduct

All the following points regarding the code and governance may be found at http://www.dentsu.com/csr/overview/codeofconduct.html.

- 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 inappropriate activities or taking inappropriate 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-recognized 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 civilized working environment
   We will ensure that our workplaces are safe and create a civilized working environment.

4. Environmental protection
   We aim to minimize 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 avoid or appropriately manage any conflicting interests. We will not knowingly take part in any form of corrupt business practice, including bribery 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.
Promotion of CSR

Dentsu has established three principal committees under its Executive Management Committee and Business Supervision Committee, which are responsible for all major management decisions. One of the committees established under the Executive Management Committee is the CSR Committee, comprising five board members and chaired by an executive officer. The committee, which met eight times (April to December) in fiscal 2015, makes decisions on all major CSR-related measures in accordance with the Dentsu Group Code of Conduct, which also serves as the Group’s CSR philosophy.

Under the CSR Committee, Dentsu has established subcommittees for human rights education and charitable donations, as well as specialist working groups to deliberate on issues in various fields. On the key theme of the environment, the CSR Committee works closely with the Environmental Strategy Council, Dentsu’s in-house body tasked with promoting environment-related programs to ensure greater Company-wide awareness concerning the environment.

For Group companies outside of Japan, a CSR action plan was developed at the DAN Board of Directors meeting. The progress of the plan is reported to and shared with the Executive Management and the CSR Committees.

We have also designated CSR promotion committee members in all Company departments to promote awareness, disseminate information on specific CSR measures, and ensure company-wide efforts. At Group companies outside of Japan, we have appointed CSR Champions, who promote CSR activities. Through such efforts, we are advancing CSR activities on a Group-wide level. Dentsu aims to ensure that its CSR measures are consistent across the Group, ensuring that member companies are able to express its characteristics.

Dentsu Group CSR Promotion System

Major Stakeholders

The Company pursues CSR activities and addresses social issues, while maintaining interactive communication with its stakeholders. The Group stresses day-to-day dialogues with stakeholders, strives to ensure the proper disclosure of information, and integrates into its activities the expectations and demands of stakeholders.

Note: In addition to the above, Dentsu has many other stakeholders, such as the government, administrative agencies, and various organizations.
Participation in International Initiatives

Dentsu participates in international initiatives in order to contribute to global social development, and strives to address activities with a focus on environmental, social and governance (ESG) issues and to promote information sharing.

The Company joined the United Nations Global Compact in December 2009 and upholds its 10 principles on human rights, labor, the environment, and anti-corruption. It submits a CSR report every year to the UN Global Compact, and compiles an annual stand-alone activities report (“Communication on Progress: COP”) aimed at the realization of the 10 principles.

Dentsu also has become a member of CSR Asia, the largest CSR-related think tank in the Asia-Pacific region, which focuses on deliberation of ESG issues in Asia and the strengthening of alliances with companies in Asia.

Common Ground Initiative

The Dentsu Group has agreed to participate in a major global initiative with the world’s other five major advertising and marketing services groups: Havas, IPG, Omnicom, Publicis, and WPP. At the suggestion of UN Secretary-General Ban Ki-moon, the Common Ground initiative focuses on specific areas of the Sustainable Development Goals (SDGs) that were adopted in September 2015 as an integral part of the 2030 Agenda for Sustainable Development at the United Nations.

This is an innovative initiative to act globally and beyond business competition. As a first step, the top management teams of each group gathered at a session of the 63rd Cannes Lions International Festival of Creativity. There, we shared awareness of the issues and agreed to work to address the most imminent global issue by fully utilizing creativity as the strength of advertising companies. We plan to jointly run the Common Ground advertising campaign to support the SDGs.

Organizing the subcommittee of the United Nations Global Compact Network Japan, Dentsu takes the initiative in Japan to achieve the SDGs and to resolve global issues.

Dentsu Group Medium-Term CSR Strategy 2020

Dentsu has formulated a five-year Dentsu Group Medium-Term CSR Strategy 2020, setting targets to be achieved by 2020. According to the Dentsu Group Code of Conduct, based on the medium-term CSR strategy—stipulating the four key areas and common goal—the Group will continue contributing to the realization of a sustainable society by steadily promoting CSR activities worldwide.

CSR Planning: Realizing a Sustainable Society

Nations around the world face a number of social issues, including those that are environment-related, such as global warming, as well as human rights violations that are found in some countries and regions. Many of the issues are the result of corporate activities, since the increased social expectations and demands are causing companies to focus on a variety of activities to fulfill their responsibilities. The advertising industry being no exception, we have persevered in our effort to manage the impact on the environment and society.

However, the role that should be played by the advertising industry is far greater than we had anticipated. That said, we have a significant impact on consumer behavior as it relates to the buying of such goods as daily consumer items, and extends to once-in-a-lifetime major purchases. While being aware of the magnitude of the impact that advertising has on consumption, we also should remain aware of our responsibilities in terms of the fairness of the content and of goods and services that consumers purchase. When it comes to environmental and social impact, we believe advertising companies should bear in mind both direct and indirect impact.

Based on the above considerations, we developed a plan that defines the common goal of the Dentsu Group. The plan—involving the collection of data regarding the Group’s resources and knowledge in Japan and overseas—will be steadily executed with a view to realizing a sustainable society, and promoting the integration of business activities and sustainability approaches.

Four Key Areas

<table>
<thead>
<tr>
<th>Environment</th>
<th>Community</th>
<th>Supply Chain</th>
<th>Responsible Marketing and Sustainable Consumption</th>
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<tbody>
<tr>
<td>To tackle climate change through reducing our environmental impacts across our operations</td>
<td>To build a more effective civil society through a wide variety of community activities</td>
<td>To develop a more resilient supply chain through developing sustainable procurement practices</td>
<td>To promote a sustainable society through implementing responsible marketing practices as well as encouraging sustainable behavior</td>
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Quantitative Targets in Japan and Overseas Offices of the Group

<table>
<thead>
<tr>
<th>Environment</th>
<th>Reduce our carbon footprint per person by 30%</th>
<th>Reduce our carbon footprint per person by 40%</th>
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<tbody>
<tr>
<td>Community</td>
<td>Have 90% of the employees participate in Dentsu's CSR program and contribute to community development</td>
<td>Enable 500 charities to build communications capabilities</td>
</tr>
<tr>
<td>Supply Chain</td>
<td>Cooperate with 90% of our main suppliers to promote sustainable business activities</td>
<td>Achieve 100% compliance with our supply chain charter principles</td>
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<tr>
<td>Responsible Marketing and Sustainable Consumption</td>
<td>Provide 90% of our employees with training in the responsible execution of their duties and use their skills and expertise to give something back to society</td>
<td>Engage 1,000,000 people with sustainable consumption campaigns</td>
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