



docomo digital

Code of Ethics and Conduct of
DOCOMO Digital Group

POLICY DETAILS

Policy Name:

Code of Ethics and Conduct

Policy Code:

CEC_GROUP_V.2.0

Drafted by:

Business Practices Committee of DOCOMO Digital Group

Approved by:

CEO of DOCOMO Digital Limited

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This policy has been approved by the CEO of DOCOMO Digital Group and it is the direct responsibility of each Country Manager or Corporate Executive to duly implement it, in compliance with all applicable laws and regulations.

Intentional and significant violation of the provisions contained in this policy will be sanctioned according to all applicable regulations.

DOCOMO Digital Group reserves the right to modify or discontinue any provisions detailed in this document as circumstances may require. A reasonable notice period will be given.

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1. Revision History

Version	Date issued	Changes
V.1.0	01/01/2017	First issue
V.2.0	15/01/2018	updated

2. Introduction

DOCOMO Digital Group is present in 6 continents with nearly 700 people of 50 nationalities in 35 offices and its credo is “**Creating the World of New Communication Culture**”.

As Employees or Directors of DOCOMO Digital Group, we believe we can create a rich and comfortable life and culture by deepening the bond between people and society and opening up the door to a new tomorrow. To create a new culture, we need a basis of a rich society, and without the inner fulfilment in addition to material monetary aspects, we cannot realize a truly rich society.

By combining NTT DOCOMO's smart life partner vision and their professional experience and expertise across the technology, mobile and payments industries our people suitably positioned to building the next-generation digitized world unlocking significant value for end users globally.

Always putting the focus first on our common mission and on our clients' and customers' needs, DOCOMO Digital people are passionate and committed ambassadors who share and spread our views with the world around them.

3. Addressees of the Code

The standards of this Code apply without distinction to the DOCOMO Digital Group's boards, its employees and those operating in the name or on behalf of the Group or who are associated with the Group through its business relationships (i.e. agents, representatives etc.).

4. Ethical Standards in DOCOMO Digital Group

Conduct in General – Ethical and Legal Compliance

We commit ourselves to the highest ethical standards and base our conduct on common moral values such as integrity, credibility, reliability and consistency. Our guideline and moral compass is to meet our responsibility as a corporate citizen in a global society at all times.

We comply with the spirit and letter of all laws, regulations and rules. Compliance is an absolute necessity. We obey any legal requirements, even if this causes disadvantages in business or difficulties for the DOCOMO Digital Group or its individuals.

We consider overriding of internal controls by DOCOMO Digital Group Employees as prohibited unless it is expressly authorized according to the relevant group policies; any intervention of overriding of internal control is fully documented as to reasons/specific action taken.

Conduct in Business – Fair Competition and Anti-corruption

We always strive to trade and compete fairly, openly and freely in commercial markets. Therefore, fair competition is a cornerstone of our business conduct. Corruption is a threat for all of us so we adopt rigorous measures to fight economic and corporate crimes.

We shall not accept, solicit or offer for ourselves or others, nor shall they offer, presents, compensation, gifts or any other benefit from/to third parties (for example suppliers, customers, or public officials) in order to gain an unfair advantage unless it is compliant with local business practices or group or local policy.

Conduct towards Customers – Customers have Top Priority

Our customers are our top priority. We take a customer-first approach to provide commodities and services that are safe and of high value and spare no effort to safeguard customer's rights and personal information.

Conduct towards Colleagues – Mutual Trust and Respect

Mutual trust and respect is key to our success as a company. We uphold the rights and individuality of each one of our colleagues and encourage a working environment that allows anyone to develop their respective abilities and personalities. We strictly condemn any form of discrimination and exploitation and actively promote equal opportunities for all of our colleagues around the world.

Conduct as a Global Company – Corporate Citizenship

We acknowledge our responsibility in an ever globalising economy and actively participate in social activities as a good corporate citizen while contributing to creating a safe and secure society.

We maintain compatibility between our business activities and environmental preservation by creating a world that is easier and healthier for people to live in. In addition, we try to help preserve the environment and contribute to building a sustainable society that supports human activities into the future.

Information Management and Practices

The protection of personal data of our colleagues, customers and business partners is one of our highest concern. We only collect and process personal data when absolutely necessary and within the applicable local legal framework.

We further acknowledge the importance of corporate proprietary and confidential information and take thorough precautions for sound management and protection of such information.

We disclose our company information in a timely and precise manner to a wide range of stakeholders in Japan and overseas to enhance the transparency of our business activities.

4. DOCOMO Digital Human Rights Charter

As part of NTT DOCOMO Group, we recognize the particular importance of human rights as a corporate responsibility and therefore aim to create a safe, secure and rich social environment by providing a DOCOMO Digital Human Rights Charter.

We protect and promote human rights based on the model of the Universal Declaration of Human Rights in all company activities.

We do not knowingly allow any negative impacts on human rights. We respond promptly and appropriately when negative impacts on human rights occur.

We do not knowingly become complicit in infringing human rights.

We do not knowingly do business with partners that infringe human rights.

5. Basic Policy of Human Rights Education

The involvement of DOCOMO Digital Group with many human rights issues is one of the indispensable factors for the support for such rich society from the mental aspect. Since corporations are members of the society, and develop with it, their involvement with human rights issues is a duty to be expected when one thinks of its connection to society.

With this awareness, DOCOMO Digital Group proceed with proactive educational activities to deepen the understanding and awareness of human rights issues in each and every employee, and through these activities nurture the sensitivity to embrace this as one's own issues, and strive to create a dynamic work environment rooted in human rights awareness, where the belief that, one would not discriminate, should not let others discriminate, and will not accept such discrimination, is firmly established.

6. Implementation of the Code

We properly recognize our role in implementing the NTT DOCOMO Group Code of Ethics. The Directors and senior management are dedicated to maintaining the Group's ethics system and fostering an awareness of ethical standards and principles among all employees throughout the Group.

The DOCOMO Digital Group, by dedicated internal functions, shall ensure:

- the distribution of the Code to all personnel and partners using effective communication channels (internet, intranet, special training modules, references to the Code in contracts etc.);
- the updating of the Code in relation to changes that may occur in the organizational structure or activities or the provisions of applicable laws;
- the proper enforcement of the Code and the immediate investigation of any violations;
- the examination of events or facts that may be incompatible with the Code and that, if confirmed to be in violation, would call for suitable disciplinary action;
- the protection of those who supply information regarding possible violations of the Code.