

Our Code of Conduct

At dentsu we believe we must be a force for good. When we do the right thing as individuals, it becomes who we are as a company. It's what makes being a force for good possible, and it starts with each and every one of us. That's why we expect everyone who works for, or on behalf of, dentsu to understand and live by our Code of Conduct.

The Code of Conduct applies to everyone within dentsu international ("dentsu"). It defines the way we act as part of the dentsu community and the core principles we are all committed to upholding. It sets out what we can expect of each other, and how we are expected to behave towards our stakeholders including clients and other business partners, shareholders, and our communities.

Working Together

- Dentsu is an anti-racist and anti-biased organisation. Through our commitment to Diversity, Equity and Inclusion, we pledge to seek out diverse perspectives, celebrate differences, and build an inclusive culture where everyone is empowered to bring their authentic self to work. We are committed to long-term sustainable change in society and within our business to ensure a culture of fairness, equity and equality for all. This means:
 - We believe that every person deserves the right to be treated with equality and dignity. There are no exceptions. We will not stand for racism, discrimination or hate in any form;
 - We treat each other with respect and do not tolerate harassment of any kind, including bullying, abusive or offensive behaviour; and
 - We will never discriminate on the basis of race, religion, nationality, ethnic or social origin, gender, gender identity, sexual orientation, age, pregnancy, neuro-diversity, differing physical abilities or any other classification protected by applicable law.

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- We all lead and behave in line with expectations as outlined in our Leadership@dentsu model.
- We look after each other. We provide a safe and healthy working environment for all our employees to protect both physical and mental wellbeing. Accidents, injuries or potentially unsafe office working conditions must be reported promptly so that we can take appropriate action.

Working Responsibly

- We behave professionally and responsibly when representing dentsu or our business partners, both in the workplace and at external work events.
- Alcohol consumption at work functions or with colleagues is controlled and responsible, and we do not allow the use, possession or distribution of drugs that are either unlawful or that might impact work duties in an impermissible manner.
- We safeguard dentsu assets whether physical, electronic, intellectual, and/or financial and use them only in ways that are authorized and appropriate for advancing dentsu's business interests.
- We ensure systems are in place to appropriately protect and process data and treat commercially sensitive information, whether our own or that of our clients and suppliers, securely and confidentially.
- We only ever obtain and use confidential or personal information, including employee data, for legitimate purposes and in compliance with relevant laws, regulations, industry standards, and internal requirements.
- We ensure that our intellectual property is appropriately protected and respect the intellectual property of others.

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Working with Integrity

- We act like responsible owners. We operate according to established principles of good governance and seek to protect the interests of all our stakeholders including clients and other business partners, shareholders, society and the environment.
- We are champions for meaningful progress. When making difficult decisions, we prioritize positive societal impact, integrity and long-term strategy over short-term success.
- We never engage in share transactions based on insider information, whether relating to dentsu or our business partners, nor provide information for others to do so nor commit market abuse.
- We respect and comply with local and international laws, regulations, and relevant industry codes, including rules around international trade and dealing with sanctioned parties, wherever we conduct business.
- We comply with internal policies and procedures, complete mandatory compliance activities, including training, and act in accordance with the highest ethical standards at all times.
- We exercise appropriate due diligence and care when entering into contracts with third parties and comply with our contractual obligations.
- We have a zero-tolerance approach to bribery and will not engage in any bribery or corrupt activities in any form, including in our dealings with third parties and business partners.
- We do not offer nor accept gifts, entertainment or hospitality that are inappropriate, or may cause any person to improperly perform their duties. When applicable we consult our internal policies and those of our business partners to confirm the appropriateness of gifts, entertainment and hospitality.
- We do not engage in fraud or money laundering nor tolerate any such activity by our people.

Our Code of Conduct

- We are honest and accurate in our record-keeping, financial and non-financial reporting, and our financial and non-financial disclosures are timely and transparent.
- We constantly seek to identify and understand the risks to our people and our business and implement risk management systems to reduce the occurrence and impact of such risks.
- We avoid any activities which may put our individual interests in conflict with those of dentsu. Where we become aware of any such conflict, we seek approval in advance, report, manage and monitor those interests appropriately.

Working in Partnership and Community

- We honour internationally recognized principles of human rights. Abuses that contravene those rights will not be tolerated within our business or those of our business partners.
- 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 labour laws. We require the same from our partners.
- We strive to build long-term relationships with our clients and protect their interests by being professional, diligent, and accountable.
- We treat our suppliers fairly, employ fair and transparent procurement practices and ensure that only companies that meet our standards are part of our supply chain.
- We operate in accordance with principles of fair and lawful competition.
- We engage in regular activities and support initiatives to contribute to the development of our local communities and promote greater social and environmental responsibility among our employees and business partners. We evaluate the impact of our business activities on the environment and endeavour to reduce harm to the environment resulting from our activities.
- We aim for the highest standard of sustainable business practices and environmental protection, acting in accordance with statutory and international standards.

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Upholding the highest standards

We expect our employees to raise any concerns or suspicions of wrongdoing, including a potential breach of this Code and/or our internal policies. There are several ways to raise concerns, including with your line managers, members of our human resources, legal, or ethics and compliance teams, or by using the whistle-blowing facility.

We do not tolerate any form of retaliation against those who have spoken up in good faith. We have a fair and consistent process to investigate incidents or concerns, which ensures that all relevant information is appropriately considered.

Violation of the standards described in this Code may result in disciplinary action, up to and including termination of employment.

Resources

Please consult the following resources if you have any queries about this Code of Conduct or if you wish to raise a concern.

- You can contact the dentsu international Data Protection Officer in confidence regarding any data protection issues: dpo@dentsu.com
- For general queries or to report a concern: compliance@dentsu.com
- To report a concern using our SafeCall Hotline:
 - email speakup@safecall.com.uk;
 - visit www.safecall.co.uk/reports to file a report online; or
 - visit <https://www.safecall.co.uk/en/file-a-report/telephone-numbers> to find the toll-free telephone number for your country for filing a report by phone.