

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 dentsu Leadership Attributes (dLAs).
- 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.

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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, you can contact Speak Up @ dentsu:
- Email speakup@dentsu.com;
- Visit www.speakup.dentsu.com to file a report online.
- Visit <https://www.dentsu.com/speak-up> to obtain the toll-free number for your country.