Rakuten Symphony

Code of Conduct

Rakuten Symphony
November 2026



Contents

Select any chapter or topic to jump straight to it.

01 **Introduction** 3

A message from our President 4
Purpose 5
Scope/Applicability 5



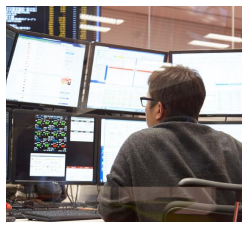
02 **Rakuten Shugi** 6

Rakuten Basic Principles 7
Brand Concepts 8
Five Principles for Success 9



03 **Our Standards & Expectations** 10

The Rakuten Group Code of Ethics 11



04 **Business Conduct** 13

Fair Business Practices 14
Financial Integrity 15



05 **People & Workplace** 16

Human rights, health and safety 17
Privacy, Information Security 18
Social responsibility 18



06 **Speak Up** 19

Reporting Concerns and Hotline 20



07 **For third parties** 21

Responsible Supply Chain 22
Supplier Hotline 22



Looking for compliance guidance and policy information?

Connect with us here



01

Introduction

Why this Code exists, who it applies to, and a message from our President.

In this section

A message from our President 4 →

Purpose 5 →

Scope/Applicability 5 →

A message from our President

Integrity at the Core of Innovation

At Rakuten Symphony, we build the infrastructure of the future upon a foundation of unwavering trust. While our technology is designed to disrupt the industry, our integrity remains our constant. Our Code of Conduct governs every decision, every interaction, and every innovation we bring to the world. It is rooted in Rakuten Shugi, the core values and principles that define our global identity within the Rakuten Group. This commitment to ethical excellence is the engine that allows us to grow with confidence.

Our Shared Responsibility

Every Rakutenian is a guardian of these standards. We build lasting partnerships by protecting our reputation and holding one another accountable. This requires the courage to speak up when we see actions that do not align with our values. We believe that transparency is not merely a policy, but the essential fabric of our daily work.

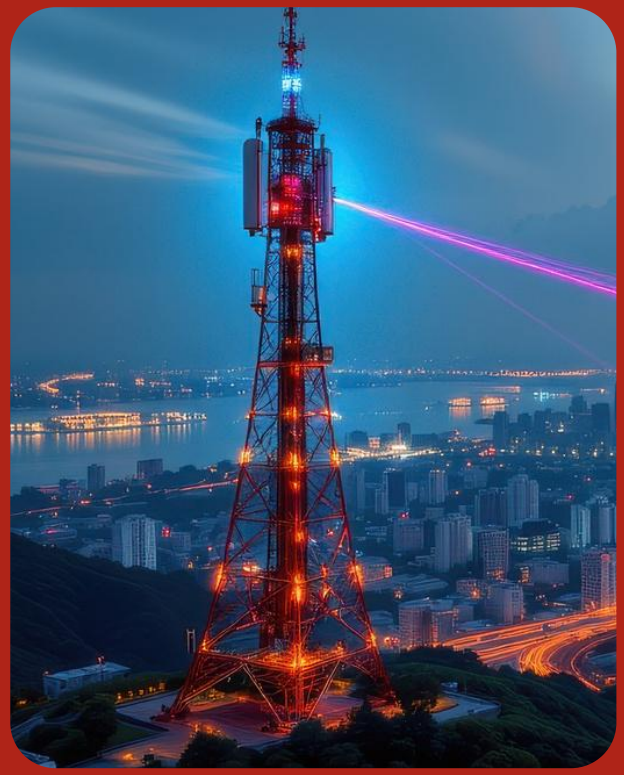
Our Commitment

Together, we are building more than just technology; we are building a legacy of trust that lasts. We invite our partners and stakeholders to join us in upholding these principles as we transform the global telecommunications landscape.



Sharad Sriwastawa,
Representative Director, President and Executive Officer

Rakuten Symphony



Purpose

Rakuten Symphony* possesses innovative mobile network solution technology that brings transformation to the information and telecommunications industry. We are uniquely positioned to support digitalization that delivers great value globally.

As a member of the Rakuten Group, our core values align with the principles practiced by all Rakuten employees, embodying Rakuten Shugi (Rakuten basic principles). These principles consist of our Brand Concepts and the Five Principles for Success. Additionally, the Rakuten Group Code of Ethics governs our compliance as we carry out our mission as a responsible member of society.

Based on these concepts and principles, we have established the Rakuten Symphony Code of Conduct for Employees and Officers. This code represents our unwavering commitment to conducting business in strict compliance with all domestic, regional and international laws and regulations across every market where we operate. We also highly prioritize internationally recognized human rights in all aspects of our business.

Scope/Applicability

*This Code applies to Employees and Officers of Rakuten Symphony, Inc. and any legal entity in which Rakuten Symphony, Inc. holds, directly or indirectly, a majority of the voting rights, or substantially controls the management of.



02

Rakuten Shugi

The core values and principles understood and practiced by every Rakuten employee.

In this section

Rakuten Basic Principles 7 →

Brand Concepts 8 →

Five Principles for Success 9 →

Rakuten Basic Principles

The core values of the Rakuten Group, along with the values and principles understood and practiced by Rakuten employees, embody Rakuten Shugi. The two components it consists of are the Brand Concepts and Five Principles for Success. Additionally, we include here the Rakuten Group Code of Ethics that we observe.

Brand Concepts

Brand Concepts represent values that we aim to realize through the businesses and other activities of Rakuten Group.

大義名分	品性高潔	用意周到	信念不抜	一致団結
On a Mission: Empowerment	**Behave Ethically:** Integrity	**Prepare to Succeed:** Professionalism	**Complete Commitment:** Get Things Done	**Solidarity:** Succeed as a team

Brand Concepts

大義名分



On a Mission: Empowerment

We believe that the only way for a business to grow over the long term is to contribute to the world so significantly that people can't imagine life without it. Our contribution to the world is empowerment, and our mission is to build a fair society by empowering individuals and companies to be successful in business and in life. The more people we can empower, the more completely we will fulfill this mission.

品性高潔



Behave Ethically: Integrity

We believe that the means of pursuing a mission are as important as the ends. Rakuten Group is committed to conducting business with honesty, sincerity and dignity.

用意周到



Prepare to Succeed: Professionalism

Though we have an important mission, unless we succeed in business we won't be able to contribute to society. To help each of us succeed, Rakuten Group has established the Five Principles for Success. By taking the initiative to prepare thoroughly and execute effectively, and by practicing the Five Principles for Success, we ensure our success.

信念不抜



Commitment: Get Things Done

We face intense competition. The importance of our mission requires us never to give up. When circumstances change, we adjust our plans so that we still accomplish our goals. Through a complete commitment to Get Things Done, we make continuous progress toward achieving that mission.

一致団結



Solidarity: Succeed as a Team

Members of Rakuten Group come from a wide variety of backgrounds. Only when we work together can this diversity become an important source of strength. The employees of Rakuten Group form one big team. Through consistent teamwork, each member of our diverse team will realize his or her full potential and our entire organization will succeed.

Five Principles for Success

Rakuten Group has an unswerving commitment to building an egalitarian society by empowering individuals and companies to be successful in business and in life. The Five Principles for Success are designed to keep each of us on track, to ensure we make continuous progress toward our ultimate goals.

Always Improve, Always Advance

There are only two kinds of people in the world: Best Effort people are satisfied with the status quo; when they fail, they console themselves by saying "I did my best." Get Things Done people are absolutely committed to reaching their goals.
With enough determination and effort, by being a Get Things Done person, you can achieve anything.

Passionately Professional

Rakuten is an organization composed of true professionals.
Real professionals in any field, whether in sports, the arts, science, business or anything else, only reach the top because they have the self-discipline to develop and improve themselves continuously.
Only by consistently working many times harder than our competitors can we consistently win.

Hypothesize → Practice → Validate → Shikumika

Success in business depends on making and executing concrete specific action plans.

Maximize Customer Satisfaction

Rakuten is first and foremost a service company. We're proud to serve our customers and we ceaselessly seek to improve their experience.

Speed!! Speed!! Speed!!

The internet makes the window of opportunity for every small business. Accomplish in one month what it takes other companies a year to do, because we can only win by being many times faster than our competitors.



03

Our Standards & Expectations

The Rakuten Group Code of Ethics, and a simple compass for tough decisions.

In this section

The Rakuten Group Code of Ethics 11 →

The Rakuten Group Code of Ethics

In line with our vision as a Global Innovation Company and with our Brand Concepts as our guiding principles, we, as members of Rakuten Group, adhere to the highest ethical standards while maximizing Rakuten Group's value to shareholders and making positive contributions to society.

We obey laws and social norms

As members of Rakuten Group, we comply with all applicable laws and regulations (consumer protection, fair competition, environmental protection, work environment, crime prevention, tax and disclosure requirements, etc.) and are committed to maintaining high ethical standards. Consistent with the principle of "Integrity" in our Brand Concepts, we pledge to respond to any illegal actions in a serious and responsible manner.





We respect all people

We respect human rights of all and uphold individual dignity. We are committed to advancing the rights of all stakeholders, including the right to privacy, freedom of expression, and a fair and safe working environment. We strive for the promotion of a society free from discrimination, harassment, child labor, and forced labor.

We strive to maximize customer satisfaction

We always put ourselves in our customers' shoes and strive to exceed their expectations. Through delighting our customers, we seek to achieve our mission of "Empowerment" and contribute to society.





We act with fairness

We believe the fundamental value of the internet is fairness. In order to help both consumers and business owners maximize the opportunities afforded to them by the internet, we also strive to act with fairness in every aspect of our business activities. This means that we respect fair competition and always seek to provide clear and accurate information to our users. We draw a line between public and private, avoid conflicts of interest, and refuse to tolerate bribery or corruption in any form.

We communicate closely with society at large, and use and manage information carefully

We work to increase transparency by actively communicating with our shareholders and society at large, as well as by disclosing company information in a timely and appropriate manner. At the same time, we are acutely aware of the value of the information we hold, both that of Rakuten Group and of our users, and are committed to using and managing such information appropriately and responsibly.





We firmly oppose the activities of criminal organizations

We firmly oppose those who threaten public safety and civil order. In pursuit of a just society and our company mission, we do not form any relationships with criminal organizations and staunchly reject all requests involving illegal or morally questionable activity.

We strive to contribute to a sustainable society

We strive to conduct our businesses responsibly, addressing any adverse impact on society, the environment, or the economy caused by our activities. Building on our core business, we will cooperate with customers, business partners, and other stakeholders to tackle challenges facing society and contribute to a sustainable future.





04

Business Conduct

How we compete, trade, and protect what we build.

In this section

Fair Business Practices 14 →

Financial Integrity 15 →

Fair Business Practices

Fair Competition

We will compete fairly and adhere to all competition legislation. Anti-competitive activities such as abuse of dominance, cartels, price fixing and market division pose a threat to our industry. We will take strict measures to combat economic and corporate crime.
In addition, we are committed to transparency of our products and services, and will deliver accurate information of the specifications, quality, and handling methods for our products and services. We will not engage in false or misleading advertising or marketing communication and will not slander other competitors or individuals.

Prohibition of corruption and bribery

We do not tolerate corrupt practices in any form, including bribery, kickbacks and other improper payments involving government officials or private entities. Employees must not offer or accept gifts, entertainment or other economic benefits that exceed socially appropriate thresholds.

Respect for intellectual property

We protect our own intellectual property and proprietary information, taking every effort to secure legal protection (such as patent filings) to avoid improper disclosure or unauthorized usage. We also make strides to protect the intellectual property and confidential information of third parties.

Appropriate trade control

We follow all trade control laws and regulations, including trade compliance, customs operation and restriction on the transaction or transfer of certain products, services and technologies to specific countries, companies or individuals.

Anti-Money Laundering and Anti-Terrorist Financing

We take a firm stance on the prevention, detection and reporting of money laundering and terrorist financing. This includes third-party due diligence, sanction list screening, employee training and continuous compliance monitoring.

Conflict of Interest

We strongly encourage employees to act in Rakuten Symphony's best interests and avoid any situation where loyalties may be divided or conflicted between the company's interests and their own. This includes personal financial, family or other business relationships with suppliers, vendors, customers or competitors. We must ensure that personal interests do not affect our judgement to prioritize Rakuten Symphony's interest.

Financial Integrity

We do not tolerate insider trading under any circumstances. Insider trading refers to financial transactions executed by employees who possess non-public information that could materially affect the value of the securities, shares, bonds or stock pricing. We require all employees who access material, non-public information to strictly follow internal compliance protocols.



Expense

Corporate assets and expenses must be used exclusively for legitimate business purposes. We strongly encourage all employees to spend company funds only when there is a clear business need and where the cost justifies the commercial benefit. All employees must remain familiar with the Table of Administrative Authority and all applicable financial policies.



Record keeping

Accurate and honest reporting is critical to meeting our legal, financial and management obligations. We ensure that all records, books and transaction reports in any form (whether electronic or paper) are accurate, complete, transparent, timely and fair. Furthermore, we provide all required data to headquarters accurately, promptly and without discrimination to ensure precise public disclosure for the stock market and investors.



05

People & Workplace

How we protect information, treat one another, and keep our records honest.

In this section

Human rights, health and safety 17 →

Privacy, Information Security 18 →

Social responsibility 18 →

Human rights, health and safety

Non-Discrimination and Equal Opportunity

We are dedicated to maintaining a creative, inclusive, culturally diverse and supportive work environment. We provide equal opportunity to all applicants and employees to ensure that hiring, promotion, workplace treatment and compensation are managed fairly.

We do not tolerate discrimination based on race, color, nationality, ethnicity, religion, belief, gender, sexual orientation, civil status, age, cultural background or disability.

Health and safety

We establish and maintain corporate operations that prevent workplace accidents, injuries or occupational diseases by strictly complying with all relevant safety regulations and proactively managing workplace hazards.

Prohibition of Child Labor and Forced Labor

We maintain zero tolerance for any form of abusive, illegal or involuntary labor within our operations or supply chains. This applies directly or indirectly to child labor, human trafficking, modern slavery, labor used to pay off debt or forced labor in prisons.

Prevention of Harassment

We cultivate a healthy, inclusive, safe and productive work environment by strictly prohibiting discrimination, harassment or bullying in any form. We do not tolerate threats, coercion, abuse, violence or intimidation in our workplace.

Freedom of Association

In conformance with applicable local laws and regulations, we respect the right of all the employees to form and join trade unions of their own choosing and to bargain collectively and peacefully. We do not tolerate hostile actions targeting these rights.

Privacy, Information Security

Privacy

We respect the privacy of all individuals, including our customers, personnel and the employees of our suppliers, vendors and contractors. We are committed to complying with all applicable domestic, regional and international laws, regulations and guidelines when collecting, maintaining, using, disclosing or disposing of personal information. We prioritize obtaining explicit consent from individuals before utilizing personal information for any purpose outside of legitimate business interest. Any incoming request from government authorities and regulators to disclose personnel information for criminal prosecution or national security will be carefully reviewed in light of applicable laws and handled appropriately.

Information Security

Information is at the core of our business. Maintaining robust information security is vital to protecting our operations and preserving the interests of our stakeholders. We safeguard our information assets, including personal data, confidential information and core information infrastructure by implementing comprehensive cybersecurity countermeasures.

Social responsibility

We acknowledge our responsibility in the global economy and strive to contribute to the social, technological and economic development of local and international communities. We are deeply committed to sustainable development, environmental protection and reducing any negative impacts on our surroundings.





06

Speak Up

If something does not align with this Code, say so. Here is how reporting works.

In this section

Reporting Concerns and Hotline 20 →

Reporting Concerns and Hotline

We strongly encourage all employees to speak up if they have concerns regarding violations of this Code of Conduct, unethical behavior or illegal acts that contradict Rakuten Symphony internal policies.



Verified and confidential

Any report submitted to the Rakuten Symphony Hotline with supporting evidence will be verified and carefully investigated with maximum confidentiality.



Zero tolerance for retaliation

We maintain a zero-tolerance policy for any form of retaliation against whistleblowers.



Anonymous or by name

While reports can be submitted anonymously, we recommend reporting by name whenever possible to facilitate a thorough investigation while ensuring the whistleblower remains fully protected.



07

For third parties

We work with suppliers, vendors and contractors who share our commitments.

In this section

Responsible Supply Chain 22 →

Supplier Hotline 22 →

Responsible Supply Chain



Fair Procurement

We build business partnerships with suppliers, vendors and contractors who share our core ethical commitments, including the Rakuten Group Code of Ethics and this Rakuten Symphony Code of Conduct. We evaluate and select our partners based on competitive pricing, quality, delivery and other objective standards in full alignment with our internal policies and guidelines.

Supplier Hotline

We encourage our suppliers, vendors or contractors to speak up if they have any concerns regarding the ethical conduct of our personnel.

Visit the EthicsPoint Page

Looking for compliance guidance or policy information?

Connect with us

Rakuten Symphony
A Rakuten Company