

Modern Slavery Statement

DOCOMO Digital Ltd, has a zero-tolerance approach to slavery of any kind. The company is committed to preventing acts of slavery and human trafficking from occurring within any part of its business activities or supply chains. This statement demonstrates how DOCOMO Digital Ltd follows some good practices, and has tried to implement some effective systems and controls to help prevent acts of slavery and human trafficking as outlined in the **Modern Slavery Act 2015**.

About Us

DOCOMO Digital Limited ('DDL'), is a wholly-owned subsidiary of one of the world's largest telecommunications company - **NTT DOCOMO**, which is listed on the Tokyo Stock Exchange.

DOCOMO Digital partners with over 200 mobile telecommunication carriers and 300 merchants globally. DOCOMO Digital Ltd's portfolio of innovative marketing solutions helps brands and mobile telecommunication carriers unlock growth, while enhancing the experience for their mobile users. DOCOMO Digital's portfolio of leading-edge payment services connects digital platforms, payment providers and mobile telecommunication carriers to enable secure and seamless mobile commerce at scale, in compliance with all local and international regulations. DDL is headquartered in London, with teams based in over 30 cities around the world.

Overview

The Modern Slavery Act 2015 received Royal Assent in the United Kingdom on Thursday, 26 March 2015 giving law enforcement the tools to fight modern slavery, carrying suitable punishments for the perpetrators whilst protecting the victims. DDL has taken a number of steps to ensure that it operates free of modern slavery.

What is modern slavery?

The offence of modern slavery includes but is not limited to subjecting someone to slavery or servitude, forced or compulsory labour, including child labour, and human trafficking, often breaching human rights law, employment law and health and safety regulations, harsh and inhumane treatment, and exploitatively low pay and long hours.

Someone is in slavery if they are:

- forced to work either through coercion, mental or physical threat.
- owned or controlled by an 'employer' through mental or physical abuse, or the threat of abuse.
- dehumanised by being treated as a commodity or bought and sold as 'property'.
- physically constrained or have unlawful restrictions placed on their freedom of movement.

Policies and Procedures

DDL has suitable provisions contained in its due diligence and risk assessment processes detailing risk management, safeguarding and also whistleblowing.

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DDL is aware of the responsibilities that the company has towards its service users, suppliers and staff and encourages staff to report any concerns.

In safeguarding DDL's commitment to help contribute to the eradication of modern slavery, the company has also reflected it in a number of DDL Policies, commercial contracts and in a number of DDL's day to day business practises, which have been established with national and international safeguarding legislation and guidance in mind. A number of safeguarding training sessions are to be scheduled throughout 2019 to include further information on modern slavery awareness and recognizing suspected human trafficking victims.

Due Diligence

To identify and mitigate the risks of modern slavery and human trafficking in DDL's own business and its supply chain, DDL:

- conducts pre-employment checks on staff and consultants that DDL employs, confirming their identities and right to work in the United Kingdom. DDL also ensure agencies are on approved contractual frameworks.
- is fully supported by local specialized recruitment firms to ensure that workers willingly desire to be appointed, are above the minimum working age and legally permitted to work in the applicable country.
- Consults and actively cooperates with trade unions (where applicable) on any proposed changes to employment terms and conditions.

Procurement

DDL's Human Resources department, Legal as well as their Compliance Teams have been trained to assess the risks through a number of processes, taking the responsible lead for compliance in the service supply chain; the relevant Modern Slavery Act 2015 clauses will be inserted into supplier terms and conditions prior to signature. It is DDL's aim that its staff become more and more alert to the issues of modern slavery and human trafficking and are able to take action, should concerns ever arise. When procuring services, DDL additionally apply the DDL terms and conditions, the DDL standard contract or relevant provisions. Both require suppliers to comply with relevant anti-slavery legislation.

The Modern Slavery Act 2015 and its explanatory notes are available at:

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

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