Nintendo Co., Ltd.
Modern Slavery Transparency Statement

This statement summarizes the policies of Nintendo (Nintendo Co., Ltd. (Japan) and its main subsidiaries) and the actions we have taken during the fiscal year ended 31 March 2022 to prevent modern slavery, including slave labor, forced labor, child labor, prison labor, and human trafficking, in our business and supply chain.

Nintendo is a developer, manufacturer and seller of entertainment products, based in Kyoto, Japan. Nintendo employs a “fabless” production model for our main products, including gaming systems and accessories, meaning we do not own the facilities that manufacture those products. Thus, we establish policies and guidelines to prevent modern slavery, and we work with our subsidiaries and production partners around the world to ensure compliance.

1. Nintendo Business Overview
As a global company with the ultimate goal of “Putting Smiles on the Faces of Everyone It Touches”, Nintendo realizes that consumer trust depends upon our commitment to conduct business in a socially responsible and legally compliant manner.

1-1 Policy
Nintendo supports and adheres to international human rights principles and standards, such as the International Bill of Human Rights and the Guiding Principles on Business and Human Rights, both from the United Nations, and the Declaration on Fundamental Principles and Rights at Work, from the International Labour Organization (ILO). Based on these principles and standards, Nintendo has established the Nintendo Human Rights Policy. The Policy was created through consultation with related internal departments and external specialists. The Policy applies to everyone employed by Nintendo, and it articulates Nintendo’s commitment to respecting human rights in accordance with our corporate vision and codes of conduct. The Policy also extends to the Nintendo supply chain, where we continuously engage with our business partners to help ensure they are conducting socially responsible operations.
In addition, to ensure fulfillment of the Policy, Nintendo has established and implemented region-specific internal codes of conduct to prevent modern slavery within our business operations.

At Nintendo Co., Ltd. (Japan), we have distributed the Nintendo Standards of Behavior to all employees, which was created based on both the Nintendo Code of Conduct and the Nintendo DNA — the spirit and strength of our cherished heritage. These Standards emphasize the importance of respecting the rights of all people and outline the high standards we expect from our employees in the performance of their duties. We take these values seriously, are committed to ensuring a proper and full understanding of human rights issues, and enact measures to prevent any human rights violations.

Our subsidiaries have implemented equivalent codes of conduct, which have been adapted to the laws, regulations, and cultures of their respective countries or territories, but which all seek to promote and protect the universal standards of behavior expected by Nintendo.

1-2 Structure and Responsibility
At Nintendo Co., Ltd. (Japan), the General Manager of the Human Resources Department ensures that Nintendo employees in Japan receive training about, and comply with, all relevant laws and regulations, the Nintendo Standards of Behavior and human rights. Similarly, each of our subsidiaries has appointed a department or person who is responsible for educating employees to ensure compliance with laws and regulations, and the respective codes of conduct.

1-3 Due Diligence
When Nintendo hires employees, we take the following measures to reduce the risk of modern slavery:

- All employees are bound by written employment contracts.
- We use reputable employment agencies to source temporary workers.
- We require each employment agency we use to provide the terms on which workers will be engaged by them, including minimum wages to be paid, before accepting employees from those agencies.
- We periodically review our terms with employment agencies and require all agencies to confirm their compliance status with all related laws and
regulations. We have a procedure employees can use to report any legal violations or suspected issues, including a violation of the Nintendo Standards of Behavior or codes of conduct.

1-4 Training
At Nintendo, we conduct the following training to inform employees about human rights topics:

- We conduct online and/or face-to-face training for employees to ensure a full understanding of the Standards or codes of conduct, and take appropriate measures to address any violation.
- If there is any suspected misconduct, we investigate these incidents in a timely manner and take all necessary steps to mitigate risks.
- At Nintendo Co., Ltd. (Japan), we conduct harassment training for all employees and human rights training for new employees.
- Training on human rights is also conducted at our subsidiaries. For example, at Nintendo of America Inc., employees receive annual training on our Code of Business Conduct. We also conduct ongoing training and education on human rights for employees engaged with our supply chain and business partners. At Nintendo of Europe GmbH, all new employees receive training on the Code of Conduct, which includes sections on protecting human rights, compliance with the UK Modern Slavery Act and non-discrimination and equal treatment. Refresher trainings on these subjects are conducted periodically for all employees of Nintendo of Europe. In addition, Nintendo Australia Pty Limited implemented training on modern slavery which the company made compulsory for all employees involved in procurement in 2022. The objective of this training was to explain to those staff our commitment to compliance with the Australian Modern Slavery Act 2018, as well as their responsibility to consider the risk of modern slavery in the supply chain when selecting a new vendor.
- We are collaborating on a global level to ensure a consistent training framework for the Nintendo Human Rights Policy.

2. Nintendo Supply Chain
Nintendo’s commitment to legal compliance and responsible manufacturing applies throughout our supply chain. Nintendo requires our production partners
to adhere to our policies and guidelines prohibiting slave labor, forced labor, child labor, prison labor, and human trafficking in sourcing, manufacturing and labor practices.

2-1  Policy
To ensure the continued fulfillment of our social responsibility throughout our supply chain, Nintendo Co., Ltd. (Japan) has established the Nintendo CSR Procurement Guidelines, which are based on relevant laws, international standards and guidelines that focus on protecting workers’ human rights, prohibiting child, forced and prison labor, ensuring workplace safety, promoting corporate ethics, safeguarding the environment and ethical sourcing. All production partners must agree to and comply with these guidelines. In the event that forced labor were to be discovered, our policy is to require remediation and to discontinue the manufacturing or procurement relationship if the situation is not remedied. We have created Japanese, English and Chinese versions of the Guidelines, which we provide to our production partners.

2-2  Due Diligence
Nintendo Co., Ltd. (Japan) requires each of its production partners to complete a written questionnaire on CSR and compliance each year.

Based on various selection criteria, including the results of the questionnaire and the production partner’s role in the supply chain, representatives from our division in charge of procurement conduct CSR Factory Verifications of selected production partners to ascertain the current on-site situation and improvement status.
In fiscal year 2021, as in fiscal year 2020, we remained unable to visit factories due to the impact of COVID-19, but we worked to understand the status of CSR activities through communication efforts such as holding more video conferences with our production partners. We also verified the CSR activities of 39 factories by creating the CSR Factory Verification Survey (68 items, 195 questions), which incorporated details checked by Nintendo during on-site inspections. We are continuously promoting these activities even during the spread of COVID-19.

Since fiscal year 2013, Nintendo has utilized third-party auditing to enhance transparency in the procurement process. In consideration of the impact of
COVID-19, we began implementing remote audits with our fiscal year 2020 audit cycle. We have also continued to conduct audits remotely for the fiscal 2021 cycle.

The third-party auditing teams generally interview managers and production site workers, review relevant documents, inspect production facilities and dormitories, and use a sampling method to verify employment contracts and policies to ensure that production partners comply with the Nintendo CSR Procurement Guidelines and its goals of providing occupational health and safety in the workplace, ensuring responsible sourcing, and avoiding modern slavery.

We share the risks identified through the CSR Factory Verifications and third-party audits with our production partners and ask them to make improvements regarding essential matters. We cooperate with our production partners to make these improvements and verify them via on-site inspections.

**Nintendo’s Global Corporate Social Responsibility Commitment**

Nintendo’s commitment to social responsibility extends beyond the manufacturing and supply chain process. To find out more about our CSR efforts, please read the CSR Information section of our corporate website: [https://www.nintendo.co.jp/csr/en/index.html](https://www.nintendo.co.jp/csr/en/index.html)

This Statement was reviewed and approved by the Board of Directors of Nintendo Co., Ltd. (Japan) at its meeting held on September 29, 2022.

Issued: September 30, 2022

Shuntaro Furukawa  
Representative Director and President  
Nintendo Co., Ltd.