

# **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 March 31, 2023 (FY 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 “fables” 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:

- We enter into written employment contracts with all employees.
- We use reputable employment agencies to hire 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.

All employees are notified of the Nintendo Human Rights Policy, which is included in the codes of conduct and compliance manuals for each country. It is also introduced to new employees of Nintendo Co., Ltd. (Japan), as part of their training. Training on human rights is also conducted at our overseas subsidiaries. For example, at Nintendo of America Inc., employees receive annual training on our Code of Business Conduct. Nintendo of America Inc. also conducts 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 GmbH. Nintendo Australia Pty Limited regularly implements training on the Australian Modern Slavery Act for all employees involved in procurement.

### **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**

With our basic procurement policy, throughout all of our procurement-related activities, Nintendo is committed to complying with laws, regulations and social standards, as well as to advancing the consideration of human rights and the global environment. Under this policy, we also work with our business partners for their understanding of and cooperation with our policies. To facilitate these

efforts, we have established the Nintendo CSR Procurement Guidelines and promote CSR procurement activities. The division in charge of procurement created the Nintendo CSR Procurement Guidelines (in Japanese, English and Chinese) to further ensure that we fulfill our social responsibility throughout the supply chain, with an emphasis on deepening mutual understanding and building trust with our production partners. These guidelines, created with the advice of external specialists, adopt the standards of the Responsible Business Alliance (RBA). They provide specific guidance based on relevant international laws, regulations and standards that address topics such as human rights, sustainability and ethical procurement, including the prohibition of forced labor, respect for workers' rights and occupational health and safety. Nintendo places great importance on respect for human rights and includes this as the first item in our CSR Procurement Guidelines. We prohibit the use of forced labor, child labor, prison labor, slave labor, human trafficking and other forms of involuntary labor in all parts of our supply chain. If forced labor were ever discovered, our policy is to require remediation and to discontinue the manufacturing or procurement relationship if the situation is not remedied.

## **2-2 Due Diligence**

Nintendo Co., Ltd. (Japan) requires all first-tier suppliers to report annually on their CSR efforts, as well as on their operation status, using the Business Status Survey. This ensures that we are aware of the CSR promotion status of our production partners. We receive these reports from all first-tier suppliers. In the Business Status Survey, we also confirm that our production partners appropriately share the Nintendo CSR Procurement Guidelines or equivalent standards with their own production partners, and that this information is made known to their workers. Additionally, to understand the status of CSR promotion at each factory of our production partners, we ask them to report on the status of CSR efforts at the factory level, using the Factory Status Survey. The Factory Status Survey includes items related to human rights, such as whether management systems and checks are in place to prevent forced labor, child labor and discrimination. It also asks about working hours, wages, protection of pregnant and nursing workers and young workers, and other health and safety questions. We also check that there is an internal reporting mechanism that allows workers to file complaints.

The division in charge of procurement at Nintendo conducts CSR Factory Verifications of our production partners selected on the basis of their responses to the Business Status Survey and Factory Status Survey, business criticality, changes in the environment and other such factors. During these CSR Factory Verifications, we examine relevant documents and inspect the production sites and dormitories. Sampling checks are conducted for the respect of human rights, labor contracts, prohibition of discrimination, child labor and forced labor, compliance with legal wages, management of working hours, health and safety of the work site, and the dissemination of this information to the workers. Through these efforts, we work to understand the state of the production sites and what improvements have been made. The CSR Factory Verifications not only serve to help us learn about the current situation, but they also offer a valuable opportunity to encourage a deeper understanding of the Nintendo CSR Procurement Guidelines, and to foster mutual understanding through direct conversation about our production partners' thoughts on CSR activities. Since the beginning of the COVID-19 pandemic, related circumstances prevented us from conducting our usual factory visits. However, we have worked to understand the status of CSR activities through communication efforts, such as increasing the frequency of video conferences with our production partners. In FY 2021, we also verified the CSR status at some production partners through written CSR Factory Verification Surveys, which incorporated details reviewed during our on-site CSR Factory Verifications in the past. We later conducted video conferences with production partners to confirm the content of the survey responses. During these video conferences, we asked about health and human rights, occupational health and safety, nursing rooms as well as other considerations for pregnant and nursing workers, internal reporting (hotline) systems, implementation of disaster drills, frequency of health checkups, the environment for waste disposal, security measures and other relevant initiatives. Since FY 2022, we have been conducting CSR Factory Verifications that formally incorporate the CSR Factory Verification Survey and video conferences as part of our procedure. In addition, we conducted on-site visits to some production partners in-scope for the FY 2022 CSR Factory Verification cycle.

In addition to the CSR Factory Verifications described above, we conduct third-party audits, focusing on further improving the transparency of our CSR procurement. With emphasis on the human rights and labor management

aspects of the Nintendo CSR Procurement Guidelines, third-party auditors make visits to certain major production partners, who are selected on the basis of prior CSR Factory Verifications, past third-party audit records, our business transactions and other such factors. During third-party audits, the auditors interview managers and workers employed at the production site in their native language, review relevant documents and inspect production facilities and dormitories. The team uses a sampling method to validate compliance in areas including respect for human rights, employment contracts, prohibition of discrimination, child labor and forced labor, compliance with legal minimum wages, management of working hours and the health and safety of the work site. In consideration of the impact of COVID-19, we implemented remote audits for our FY 2020 and FY 2021 audit cycles. We conducted on-site audits for the FY 2022 cycle.

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>

This Statement was reviewed and approved by the Board of Directors of Nintendo Co., Ltd. (Japan) at its meeting held on September 28, 2023.

Issued: September 28, 2023

A handwritten signature in black ink, appearing to read "Shuntaro Furukawa", is written over a solid horizontal line.

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