Nintendo Human Rights Policy

Nintendo (Nintendo Co., Ltd. and its consolidated subsidiaries) strives to respect the human rights of everyone. It is our mission to "Put Smiles on the Faces of Everyone Nintendo Touches," and respecting the rights of others and acting in an ethical manner are critical elements to achieving this mission.

1 . Position Statement

Nintendo supports and adheres to international human rights principles and standards, such as the International Bill of Human Rights*1 and the Guiding Principles on Business and Human Rights, both from the United Nations, and the Declaration on Fundamental Principles and Rights at Work*2, from the International Labour Organization (ILO). Based on these principles and standards, Nintendo hereby establishes this Nintendo Human Rights Policy.

This Policy also articulates Nintendo's commitment to respecting human rights in accordance with our corporate vision and codes of conduct.

- *1: The International Bill of Human Rights is a collective name for the Universal Declaration of Human Rights, adopted by the United Nations and the International Covenants on Human Rights (the International Covenant on Civil and Political Rights)
- *2: The Declaration on Fundamental Principles and Rights at Work includes eight conventions, broken down into four categories: Freedom of Association and the Effective Recognition of the Right to Collective Bargaining, Elimination of All Forms of Forced or Compulsory Labour, Effective Abolition of Child Labour, and Elimination of Discrimination in Respect of Employment and Occupation. Those conventions are positioned as core labor standards requiring compliance, at minimum, around the world.

2 . Applicable Scope

This Policy applies to everyone employed by Nintendo. This 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.

3 . Responsibility to Respect Human Rights

This Policy has been approved by the Nintendo Co., Ltd. Board of Directors.

Our efforts for human rights have been incorporated into compliance processes throughout Nintendo.

4. Compliance With Laws and Regulations

Nintendo complies with all laws and regulations in the countries and regions where we conduct business. We will also respect international human rights standards to the maximum extent possible.

5. Education

Nintendo educates everyone employed by Nintendo about this Policy to ensure effective integration and implementation into every aspect of our business activities.

6. Human Rights Due Diligence

To consider ways to advance our human rights due diligence, Nintendo advances discussions at the global level and involves opinions from external experts.

In the event that through the process of identifying and evaluating human rights risks, and addressing prioritized issues, it becomes clear that Nintendo has negatively affected human rights through our business activities, or been involved in activities in this regard, we will act to rectify the situation.

7 . Stakeholder Dialogue and Consultation

Nintendo strives to communicate with related stakeholders through a variety of means, and incorporates opinions from external experts to ensure that our activities do not negatively affect human rights in the countries and regions where we conduct business.

8 . Mechanisms for Responding to Complaints

In addition to having consumer service channels in place to respond to the wide range of inquiries we receive from our consumers, Nintendo handles internal reports and inquiries regarding human rights issues for those employed by Nintendo through internal consultation and investigation.

9. Information Disclosure

Based on the Policy, Nintendo will report on our human rights initiatives through various media, including the Nintendo Corporate Social Responsibility Report.

September 28, 2018

Shuntaro Furukawa

Representative Director and President

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Nintendo Co., Ltd.