

# **Nintendo Co., Ltd.**

## **Modern Slavery Transparency Statement**

**This statement summarizes the policies of Nintendo (Nintendo Co., Ltd. and its main subsidiaries) and the actions Nintendo has taken during the fiscal year ended 31 March 2019 to prevent modern slavery, including slavery, child labor, forced labor and human trafficking, in Nintendo's business and supply chain.**

**Nintendo is a manufacturer and seller of entertainment products, based in Kyoto, Japan. Nintendo employs a fables production model, meaning we do not own the facilities that manufacture our products. Thus, we establish policies and guidelines to prevent modern slavery, and we work with our subsidiaries and our production partners around the world to implement those policies.**

### **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., we have distributed the Nintendo Standards of Behavior to all employees. These Standards include the Nintendo Code of Conduct and the Nintendo DNA — the spirit and strength of our prized heritage.

These Standards emphasize the importance of respecting the rights of all people and outline the high standards Nintendo Co., Ltd. expects from its employees in the performance of their duties. We, at Nintendo Co., Ltd., 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., 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 recruitment 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 of the Standards or codes of conduct.
- 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., we have implemented an e-learning program designed to deepen employees' understanding of human rights.
- Training on human rights is also conducted at our subsidiaries. At Nintendo of Europe GmbH, human rights training and training on the UK Modern Slavery Act is part of the regular Code of Conduct training for all new employees. In addition, Nintendo Australia Pty Limited is preparing to implement training on the Australian Modern Slavery Act 2018, for new recruits and existing employees.
- At Nintendo of America Inc., work is underway to include the Nintendo Human Rights Policy in annual training for all employees, to be implemented alongside existing trainings on the Code of Conduct.
- 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 responsible and compliant manufacturing applies throughout our supply chain. Nintendo requires our production partners to adhere to our policies and guidelines prohibiting slavery, human trafficking, child labor or forced labor 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. has established the Nintendo CSR Procurement Guidelines, which are based on relevant laws, international standards and guidelines that focus on protecting human rights, prohibiting child and forced labor, ensuring workplace safety, promoting corporate ethics, safeguarding the environment and sourcing materials ethically. All production partners must agree to comply with these guidelines.

## **2-2 Due Diligence**

Nintendo Co., Ltd. requires each of its production partners to complete a written CSR compliance questionnaire each year.

Based on various selection criteria, including the results of the questionnaire and the production partner's role in the supply chain, we send personnel to conduct on-site inspections of selected production partners to ascertain the current on-site situation and improvement status. In fiscal year ended 31 March 2019, we visited 19 selected production partners. Along with revisions to the Nintendo CSR Procurement Guidelines to help realize responsible mineral procurement, the document, which was previously available in only Japanese and English, has also been translated into Chinese so that it can be understood easily by local employees. In addition, we conduct CSR training that includes an understanding of human rights appropriate for new recruits whose work relates to the supply chain.

Since fiscal year 2013, Nintendo has utilized third-party auditing to enhance transparency in the procurement process.

The third-party auditing team interviews managers and workers, reviews relevant documents, inspects production facilities and dormitories, and uses 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 safe working conditions, ensuring responsible sourcing, and avoiding modern slavery.

In fiscal year ended 31 March 2019, an independent third party audited four of our production partners with an emphasis on human rights and labor practices to ensure compliance with the Nintendo CSR Procurement Guidelines.

### **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 report on 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. on September 27, 2019.

Published: September 2019

A handwritten signature in black ink, reading "Shuntaro Furukawa", is positioned above a solid horizontal line.

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