

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, 2026 (FY 2026) 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 dedicated video game systems and accessories, which means that 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 production partners 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 adopted by a Board of Directors decision after receiving advice from external experts. 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 provide each employee with the Nintendo Standards of Behavior, which constitute the policy for all actions at Nintendo. These guidelines include both the Nintendo DNA and the Nintendo Code of Conduct – basic rules our employees should uphold.

Our subsidiaries outside Japan have also implemented their own codes of conduct for employees.

1-2 Structure and Responsibility

At Nintendo Co., Ltd. (Japan), the Senior Director 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 subsidiaries outside Japan. For example, at Nintendo of America Inc., employees receive annual training on the 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 SE, 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 SE. Nintendo Australia Pty Limited annually conducts training on the Australian Modern Slavery Act, which is mandatory 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, Nintendo is committed to complying with laws, regulations, and social standards as well as to advancing human rights and global environmental considerations throughout all of our procurement activities. We also work with our production partners to gain their understanding of and cooperation with these policies. To facilitate these efforts, we have established the Nintendo CSR Procurement Guidelines and promote CSR procurement activities. The Sustainability Coordination Team and the division in charge of procurement publish 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 the respect for human rights and includes this as the first item in our 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.

2-2 Due Diligence

Nintendo carries out supply chain due diligence in order to assess human rights, environmental and other risks and work to reduce them. As part of these efforts, to understand how CSR is being promoted by our production partners, we ensure their awareness of the Nintendo CSR Procurement Guidelines, confirm the state of CSR through written surveys, conduct interviews and on-site visits to understand the current status, and follow up to make improvements. In addition, since July 2024, Nintendo has been a member of the RBA, an industry alliance dedicated to advancing social responsibility in global supply chains.

2-2-1 Confirmation by Written Survey

Nintendo conducts a written Business Status Survey and Factory Status Survey once a year to confirm the level of CSR procurement at our production partners.

In the Business Status Survey, we verify business conditions and other items such as the following (all first-tier suppliers respond to this survey):

- Compliance of first-tier suppliers with the Nintendo CSR Procurement Guidelines
- First-tier suppliers' confirmation of second-tier supplier compliance with the Nintendo CSR Procurement Guidelines or equivalent standards

The Factory Status Survey checks the status of CSR procurement of our production partners at a factory level. The survey includes items related to human rights, such as whether management and checks are implemented to prevent forced labor, child labor and discrimination, as well as questions covering working hours, wages, and health and safety topics including the protection of pregnant and nursing workers and young workers. We also confirm that there is an internal reporting mechanism that allows workers to file complaints.

2-2-2 Confirmation of Current Site Status

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 business environment and other such factors. To further enhance the transparency of our CSR procurement, a third-party firm also carries out audits of our main production partners selected based on the business relationship status and other factors.

CSR Factory Verifications and third-party audits confirm the actual situation at production sites with regard to the items covered in the CSR Procurement Guidelines, such as promoting respect for human rights and legal compliance (including labor contracts, prohibition of discrimination, child labor and forced labor, compliance with legal wages, and management of working hours) and ensuring occupational health and safety. During a CSR Factory Verification, we hold video conferences with our production partners after reviewing answers to a questionnaire provided in advance about various CSR topics. Following this, as a general principle, we visit the sites ourselves to confirm the situation directly. At video conferences and on-site visits, we work to fully understand the actual conditions at each site, confirming that the Nintendo CSR Procurement Guidelines are being upheld by checking the status of health and safety at production sites and dormitories, wages, working hours, protections for young workers and pregnant and nursing workers, and various other items via a sampling method.

CSR Factory Verifications go beyond understanding the situation at each site by creating important opportunities to deepen mutual understanding about CSR through dialogues with our production partners.

During third-party audits, auditors review relevant documents and perform a sampling check to verify wages, working hours and other items. Auditors also confirm that the human rights of workers are respected and their health and safety ensured through interviews with managers and workers employed at the production sites in their native language and observation of production sites and dormitories.

2-2-3 Follow-Up for Improvement

We share the topics identified by the CSR Factory Verifications and third-party audits with our production partners and request corrective actions based on the follow-up guidelines for each item that needs to be improved. The corrective actions taken are then confirmed by either visiting the site or through a video conference.

For example, issues indicated by our CSR Factory Verifications and third-party auditing have included occupational health and safety and labor issues. Occupational health and safety issues included inadequate emergency and evacuation exit signs, insufficient emergency lighting and fire extinguishers, and fire alarm buttons installed in places that are difficult to access. From a labor perspective, the reviews also noted long overtime. During our on-site follow-up verifications, we have confirmed improvements that meet our expectations to the fire extinguishers, emergency lighting and other installations mentioned above. Also, in addition to checking via the follow-up verification process, we are continuing to confirm the status of working hours through other means of communication to ensure that the issue is properly addressed. The responsible parties in our division in charge of procurement make the final decision about whether to continue business with a production partner based on the results of various written surveys, video conferences, CSR Factory Verifications, and third-party audits carried out as part of our supply chain due diligence. If serious issues, such as those involving human rights or the environment, are discovered, we will require that the issue or issues be addressed, and the responsible parties at Nintendo may make the final decision to cease business with a production partner if our requirements are not met. In FY 2026, we did not identify any serious issues through our supply chain due diligence efforts that would lead to ceasing business with a production partner.

Nintendo's Sustainability Commitment

To find out more about Nintendo's sustainability efforts, please read the Sustainability section of our corporate website:

Europe/Australia

<https://www.nintendo.co.jp/sustainability/en-gb/index.html>

U.S.

<https://www.nintendo.co.jp/sustainability/en-us/index.html>

This Statement was reviewed and approved by the Board of Directors of Nintendo Co., Ltd. (Japan) at its meeting held on August 28, 2026.

Issued: September 30, 2026



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