

KONAMI DIGITAL ENTERTAINMENT B.V.

Modern Slavery Act, Transparency Statement

Financial Year: 2018/19

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015, and sets out the steps Konami Digital Entertainment B.V. (“Konami”) has taken during the year ending March 2019 to prevent human trafficking and modern slavery in its business and supply chains.

Introduction

Konami is a leading video game and trading card game publisher and distributor, active in the gaming industry throughout Europe. We are part of the Konami Group of Companies, and our parent company is Konami Holdings Corporation, headquartered in Tokyo, Japan. As of March 31st 2019, the Group operates across 22 consolidated subsidiaries and employs 10,392 people worldwide.

Konami understands that modern slavery, forced labour and human trafficking is a growing global issue, and one that affects every type of economy. Konami has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with integrity in all our business dealings and relationships.

Policies and Practices

Konami’s internal policies relevant and applicable to this issue include the following:

- (i) **Employee Handbook**: We prescribe an environment in which employees act ethically, honestly and with integrity. The handbook has been recently updated to provide accurate policies in place such as anti-bribery; the handbook is easily accessible to everyone employed by Konami.
- (ii) **Whistleblowing Policy**: Employees are encouraged to speak up and report any activities which are suspected to be in violation of the law (which would include any wrongdoing with regard to human rights violations, such as modern slavery), or company policy and which cannot be directly reported to a direct supervisor for a particular reason. All reports will be fully investigated, and appropriate remedial actions taken.
- (iii) **Anti-slavery and human trafficking policy**: In May 2019, we introduced a company Anti-slavery and human trafficking policy, which confirms that we will not tolerate or condone any abuse of human rights within any part of our business or supply chains and will promptly address with the utmost level of importance, any allegations that human rights are not respected. This is provided to all new employees during their induction process.
- (iv) **Konami Group Code of Business Conduct and Ethics**: Illustrates Konami’s policies on a number of important company matters such as prohibition of bribery, respect for human rights, fair dealings with suppliers as well as a healthy working environment.

Additionally, Konami includes obligations to comply with the Modern Slavery Act (and any local law equivalent thereof) and its Anti-slavery and human trafficking policy its standard services/supplier contractual terms. Suppliers who breach these obligations will face appropriate action, which could include termination of contracts.

Due Diligence

Konami's biggest exposure to modern slavery and human trafficking is in its manufacture/product supply chain.

We work with a limited number of suppliers in this field - one major manufacturer for our trading card game supplies, and each of the first party video gaming platforms (collectively "**Product Suppliers**").

We use a risk-based questionnaire, which we sent to each of our Product Suppliers and which aims to identify any areas of particular concern both in the Product Supplier's own manufacturing operations, and also in those of *its* suppliers and supply chains. We commit to re-sending this on an annual basis, to ensure any change in circumstances is captured.

We also ask for a commitment from our Product Suppliers that they have policies and processes in place, which mirror ours in terms of identifying and addressing any risks of modern slavery and/or human trafficking.

In the event of a third party failing to meet our expectations in this area or demonstrate an unwillingness to make any changes suggested by us, we may cease to engage them.

Furthermore, when Konami hires employees, we take the following steps to reduce the risk of modern slavery within the workplace:

- All Konami employees are bound by written employment contracts.
- Konami uses credible employment agencies to source its employees.
- We require our recruitment agencies to apply the same standard of anti-slavery precautions as we do as a company.

Training

Our Anti-Slavery and Human Trafficking Policy forms a part of the compulsory induction and training phase for any new employee of Konami.

Summary

We understand that the risk of modern slavery is ongoing (and, in certain economies, increasing) and as such Konami is committed to continuing its threefold approach to mitigating that risk in the year ahead, as follows;

- Education and Training
Ensuring that modern slavery is in the consciousness of all employees, and that every person is encouraged to speak up in the event that they suspect or are aware of any violation of human rights.

- Continuous monitoring of risk

We will revisit our questionnaire with our Product Suppliers on an annual basis to identify any new areas of risk.

- Accountability

We will be accountable for our business relationships, and work progressively to eliminate any vulnerabilities in our business and or supply chains. Where modern slavery or other abuses of human rights are suspected or identified, we will take prompt corrective action and work with suppliers to ensure future risk is eliminated.

This statement was approved by Konami Digital Entertainment B.V. on 23rd May 2019.

Signed:



Masami Saso
European President
May 2019.

