

KONAMI DIGITAL ENTERTAINMENT B.V.

Modern Slavery Act, Transparency Statement

Financial Year: 2022/23

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 2023 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 2023, the Group operates across 24 consolidated subsidiaries and employs 8,857 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.

- 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 15 June 2023.

Signed:



Naoki Morita
European President
June 2023