

Together with all people throughout the world, the Bandai Namco Group aims to create a future where people and other people, people and society, and people and the world are connected through the rich emotions created by entertainment, as represented by Bandai Namco’s Purpose of “Fun for All into the Future.” To fulfill our responsibility to respect the human rights of all stakeholders involved in the Bandai Namco Group’s business activities, we established the Bandai Namco Group Human Rights Policy in November 2023. Recognizing the impact that business activities can have on human rights, we consider it our corporate responsibility to respect the human rights of all stakeholders involved in the Group’s business activities. To that end, we are promoting initiatives in accordance with international frameworks such as the UN Guiding Principles on Business and Human Rights.

Bandai Namco Group Human Rights Policy

Together with all people throughout the world, the Bandai Namco Group aims to create a future where people and other people, people and society, and people and the world are connected through the rich emotions created by entertainment, as represented by Bandai Namco’s Purpose of “Fun for All into the Future.” In order to fulfill our responsibility to respect the human rights of all stakeholders involved in the business activities of the Bandai Namco Group, we hereby establish the Bandai Namco Group Human Rights Policy.

Scope of Applicability

This policy applies to directors, auditors, officers and employees of the Bandai Namco Group (meaning Bandai Namco Holdings Inc. and its subsidiaries; the same shall apply hereinafter). We also ask all of our business partners and suppliers to understand, support, and comply with this policy.

Commitment to Respecting Human Rights

The Bandai Namco Group understands that our business activities may impact human rights, and will fulfill our responsibility to respect the human rights of all stakeholders involved in our business activities.

Compliance with Laws and Regulations Related to Respecting Human Rights

The Bandai Namco Group will promote initiatives to respect human rights based on the United Nations Guiding Principles on Business and Human Rights and the Children’s Rights and Business Principles.

Furthermore, in each country and region where we conduct business, the Bandai Namco Group complies with the domestic laws and other regulations of the relevant countries, and respects internationally recognized human rights. When faced with conflicting requests, we will do our utmost to honor the principles of internationally recognized human rights.

Governance

We will place the President and Representative Director in charge of this policy, and the Chief Sustainability Officer (SCO) in charge of promoting this policy, and will promote initiatives to respect human rights in accordance with this policy.

Human Rights Due Diligence

The Bandai Namco Group will construct and continuously operate a human rights due diligence system to identify, prevent, and mitigate adverse human rights impacts related to the Bandai Namco Group’s business activities.

Remedy and Correction

If we identify that the Bandai Namco Group has caused or contributed to negative human rights impacts, we will take legitimate processes to remedy the situation and prevent a recurrence.

Education

The Bandai Namco Group will ensure that related policies, guidelines, and other necessary procedures reflect this policy, in order to embed this policy in all business activities. We also will provide appropriate education so that all directors, auditors, officers and employees understand this policy and implement it in their respective corporate activities.

Dialogue and Consultation with Stakeholders

For initiatives taken under this policy, the Bandai Namco Group will consult with independent external experts on human rights and engage in dialogue and consultation with relevant stakeholders.

Verification of Progress and Information Disclosure

The Bandai Namco Group will monitor and improve the status of compliance with this human rights policy continuously. We will disclose the progress of human rights initiatives based on this policy through media such as the official website and integrated reports of Bandai Namco Holdings Inc.

Date of Establishment: November 1, 2023

Masaru Kawaguchi

Group CEO

President and Representative Director

Bandai Namco Holdings Inc.

Governance

Recognizing the importance of social sustainability for its business activities, the Group has established the Group Sustainability Committee, chaired by the president and representative director, to more promptly formulate and implement sustainability-related activities.

The committee meets semiannually to discuss measures to respond to human rights countermeasures, which represent one of the Group’s important agenda items. After considering each

measure, the results are regularly reported to the Board of Directors, which deliberates the results and provides supervision accordingly. In addition, the Group Sustainability Subcommittee, which is a subordinate organization under the Group Sustainability Committee, is working to promote activities in line with the Bandai Namco Group Sustainability Policy and the Group’s material issues.

Strategy

To further clarify the Bandai Namco Group’s stance and initiatives regarding human rights, we formulated the Bandai Namco Group Human Rights Policy in November 2023. We understand that corporate business activities have an impact on human rights,

and thus we consider it our responsibility as a company to respect the human rights of all stakeholders involved in the Bandai Namco Group’s business activities.

Risks and Opportunities in the Group’s Response to Human Rights-Related Issues

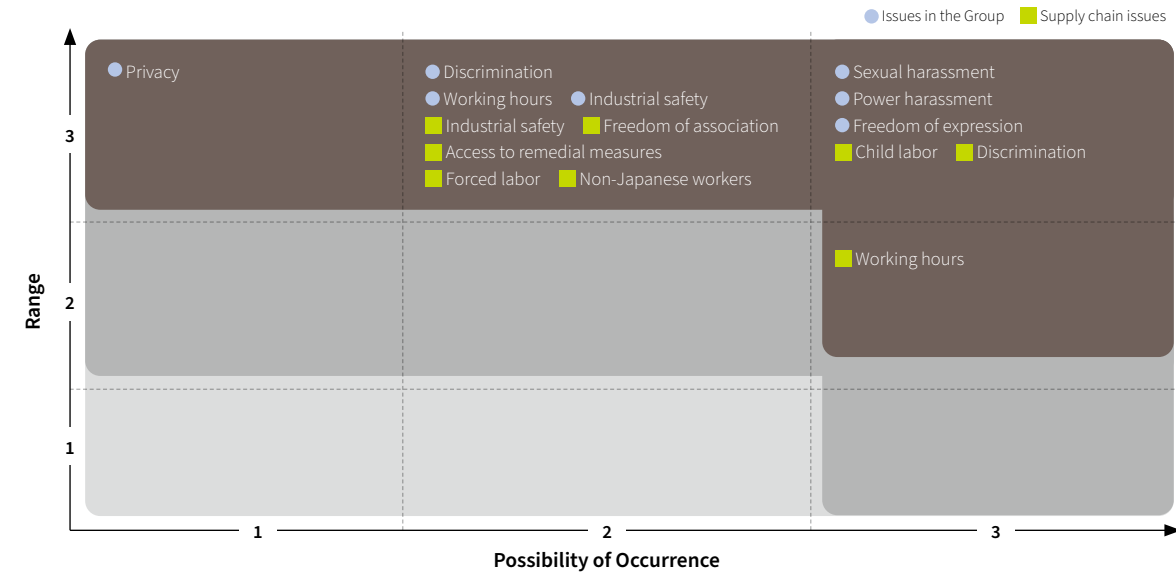
Risks	Opportunities
<ul style="list-style-type: none">Increased business risks due to a delayed response to ever-tightening laws and regulations across the globeDeclining productivity following the occurrence of human rights infringements in the supply chain	<ul style="list-style-type: none">Building of good relationships with business partners and increased productivityEnhanced engagement among Group employees

Risk Management

Mapping of Human Rights Risks

The Group analyzes the negative impact that its business activities have on human rights. With regard to anticipated human rights-related risks, the Group identifies risks that are particularly important from the perspectives of level of severity and likelihood of occurrence. In FY2024.3, we mapped out human rights issues that present risks in terms of the negative impacts of our business activities. We believe that the following items are human rights-related risks toward which we must prioritize our response.

We have therefore identified and evaluated these risks in terms of both actual and potential impacts on human rights, in accordance with our human rights due diligence process. We will carry out appropriate measures to reduce potential risks, and for actual impacts that we are having on human rights, we will strive to resolve issues so that we can eliminate these impacts. At the same time, we will implement appropriate remedial measures for all parties impacted, as necessary. Moving forward, we intend to revise this map on a continuous basis.



● Implement Human Rights Due Diligence

The Bandai Namco Group recognizes that its business activities could potentially affect human rights. We recognize our responsibility to respect the human rights of all our stakeholders, including employees, their families, and business partners. Toward this end, we promote an understanding of human rights across the entire supply chain.

Previously, we implemented risk management for each business segment. However, in order to identify, prevent, and mitigate negative impacts on human rights related to the Group's business activities, we will build a human rights due diligence mechanism

and continuously manage risks using a risk-based approach. In October 2022, we engaged a third party to conduct human rights due diligence covering our main businesses. This third party identified high-potential human rights risks in the manufacturing sector in East Asia and Southeast Asia among the Group's businesses. In FY2024.3, we implemented a risk analysis of all our businesses both in Japan and overseas. Moving forward, we will strive to prevent the occurrence of potential human rights issues and address any issues we have already identified.



● Status of Main Initiatives at Group Companies

Bandai Co., Ltd. and Bandai Spirits Co., Ltd. conduct Bandai Factory Audits (BFAs), which integrate quality audits and Code of Conduct (CoC) audits, at nearly all overseas final packaging plants that manufacture products for the Japanese market (approximately 300 companies in fiscal 2023). Additionally, we verify CoC items through reports from third-party CoC standards such as the Sedex Members Ethical Trade Audit (SMETA) and the International Council of Toy Industries (ICTI). The basic policy for BFAs is the Bandai CoC Declaration, which calls for strict observance of standards concerning forced labor, child labor, working hours, wages and allowances, punitive action, and discrimination. Audits are conducted in accordance with our original BFA manual. Additionally, we hold supplier conferences to share information with our business partners, working together to improve legal compliance and working conditions, including the prevention of forced labor and modern slavery. Bandai Spirits conducts audits of factories that have not been certified based on BFAs or third-party standards in accordance with its own Bandai Spirits Minimum Requirements Audit Report to confirm human rights requirements.

Additionally, Bandai Shenzhen Co., Ltd., which provides production and quality management for major products destined for Europe and North America, conducts transactions with factories certified by third-party organizations such as the ICTI Ethical Toy Program and SMETA. These certifications include prohibitions on forced labor, human trafficking, and child labor. All primary factories for products for Europe and North America that Bandai Shenzhen transacted with in fiscal 2023 were certified.

Bandai Namco Amusement Inc. carries out transactions only with suppliers for which it has confirmed the absence of illegal acts in the areas of forced labor, child labor, working hours, wages and allowances, punitive action, discrimination, and environmental protection. Also, regarding plants that assemble arcade game products with which we initiate a new business relationship, we conduct interviews on confirmation items including the working environment. We also conduct audits of new and existing factories that we do business with, as necessary.



Bandai Factory Audits

● Activities to Raise Awareness of Human Rights

To inform and disseminate the Group's philosophy and approach to human rights among employees, including Group officers, we conduct awareness-raising activities as appropriate.

To ensure compliance with laws, ethical behavior, and internal regulations, the Bandai Namco Group has established the Bandai Namco Group Compliance Charter, which serves as a code of conduct for directors and employees of the Company and its subsidiaries. We have distributed in-house posters across the entire Group, including overseas locations, clearly stating the Compliance Charter. At the same time, we distribute the Bandai Namco Group Compliance Book, a practical guide, to all directors and employees.



Executive workshop

Additionally, the Group conducts compliance awareness surveys for directors and employees and works to disseminate the philosophy outlined in the charter through various in-house training programs, including e-learning and new employee training.

Furthermore, believing that promoting executive management's understanding is vital to strengthening human rights measures in the Group, we hold study sessions on human rights for directors of Bandai Namco Holdings. We also hold seminars and e-learning for employees on topics such as sustainability, work-life balance, the LGBTQ community, and disabilities to raise awareness of human rights and foster a culture of sustainability within the Group.



e-learning for employees (available in multiple languages)

● Consultation Hotline for Human Rights Issues

The Bandai Namco Group accepts whistleblowing and consultations on human rights issues through various hotlines and

accepts complaints and reports related to human rights issues from a wide range of stakeholders through external platforms.

Whistleblowing Hotline for Employees

We have established a whistleblowing system at Group companies in Japan and overseas that allows employees to consult at any time about human rights issues that arise within the Group by e-mail, telephone, in person, or via other means.

Consultations are also accepted anonymously, and we respond promptly after thoroughly protecting the consuler so that they will not be treated unfairly as a result of their consultation.

Whistleblowing Hotline for External Stakeholders

Inquiries from stakeholders regarding human rights issues can be made via the Banda Namco Holdings corporate website.