

Nintendo Co. Ltd.

TICKER
TSE:7974

MARKET CAPITALIZATION
US\$53 billion

HEADQUARTERS
Japan

COMPLIANCE

UK Modern Slavery Act: [Yes](#)

COMMITMENTS
[None](#)

California Transparency in Supply Chains Act: [Not applicable](#)

OVERALL RANKING

24 out of 40

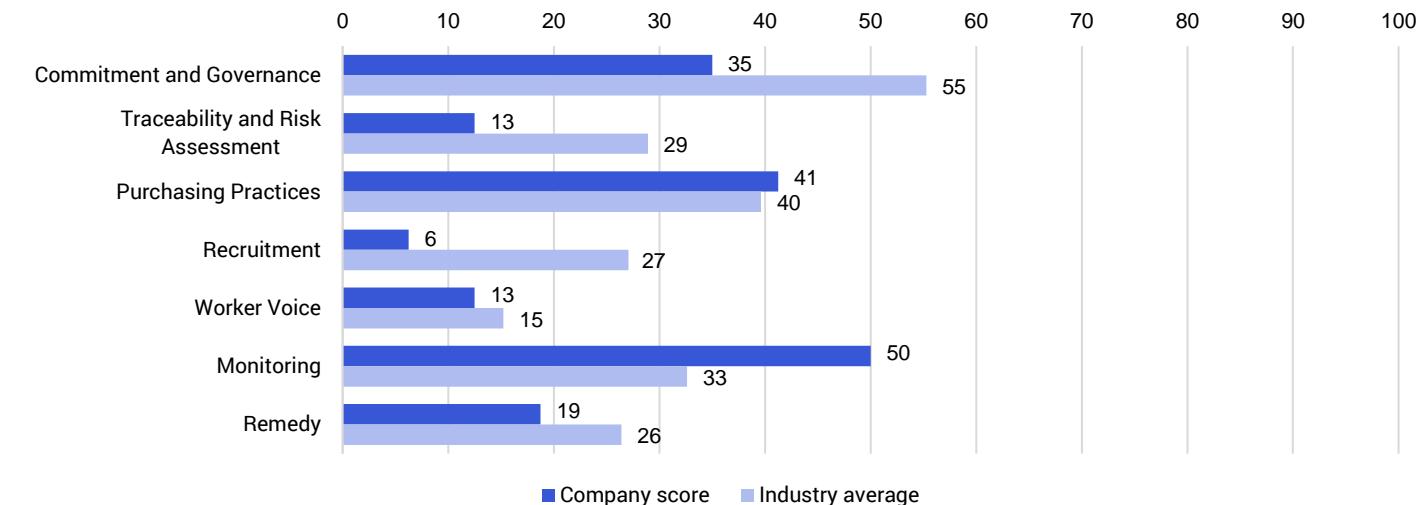
OVERALL SCORE

25 out of 100

SUMMARY

Nintendo Co. Ltd. (Nintendo) ranks 24th out of 40 companies, disclosing less information on its forced labor policies and practices than its peers on most themes. The exceptions are monitoring and purchasing practices where it discloses more information than its peers. The company's statement under the UK Modern Slavery Act is one of the few that is compliant with all three minimum requirements (director signature, board approval, link on homepage). Additional steps the company could take to address forced labor risks in its supply chains include strengthening its disclosure and practices on the themes of commitment and governance, traceability and risk assessment, and recruitment. For example, the company may consider engaging relevant stakeholders on forced labor and requiring that workers in its supply chains are not charged fees during any recruitment-related process.

THEME LEVEL SCORES



LEADING PRACTICES

None

NOTABLE FINDINGS

Commitment and Governance: Nintendo discloses that its Procurement Guidelines, which require its suppliers to uphold workers' fundamental rights and freedoms, have been communicated to 300 production partners during on-site inspections. It further states that it has continually had "conversations regarding [these] Guidelines, aiming to improve our production partners' awareness". In addition, the company states that it provided training to employees who carry out on-site inspections of production partners, including on its CSR Procurement Guidelines.

Purchasing Practices: Nintendo discloses that it is incorporating CSR-related requirements, including its CSR Procurement Guidelines (which cover forced labor and human trafficking), in its "Basic Partner Agreement". Further, the company's CSR Procurement Guidelines state that their requirements should be provided to "supporting suppliers and require these suppliers to apply them pervasively".

Monitoring: Nintendo discloses that it inspects its production partners to ensure CSR compliance in its supply chains. These inspections include on-site visits of production facilities and dormitories. The company also uses third-party audits, which include a review of documents such as employment contracts as well as interviews with workers. The company discloses that the third-party auditors it uses have expertise auditing labor issues and can speak with workers in their languages. In addition, the company discloses the number of audits undertaken, and notes that the scope of its monitoring includes "first tier and other upstream suppliers".

OPPORTUNITIES FOR IMPROVEMENT

Commitment and Governance: The company is encouraged to establish and disclose a managerial structure with clear responsibilities and accountability for the implementation of its supply chain policies and programs relevant to human trafficking and forced labor, both within the company and at the board level. Further, the company is encouraged to engage with relevant stakeholders on human trafficking and forced labor. This includes engagement with policy makers, worker rights organizations, or local NGOs in countries in which its suppliers operate, as well as actively participating in one or more relevant multi-stakeholder or industry initiatives.

Traceability and Risk Assessment: The company is encouraged to demonstrate a strong understanding of its supply chains by disclosing the names and addresses of its first-tier suppliers, the sourcing countries of raw materials at high risk of forced labor and human trafficking, and information on its suppliers' workforces. The company may further consider assessing and disclosing forced labor and human trafficking risks in different tiers of its supply chains.

Recruitment: To avoid exploitation of migrant workers in its supply chains, the company may consider requiring that workers in its supply chains are not charged fees during any recruitment-related process. The company is encouraged to require that such fees are paid by the employer ("Employer Pays Principle"), and where such fees have been paid by suppliers' workers, to ensure that fees are reimbursed to the workers.

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Yes](#)