

Nintendo Co. Ltd.

TICKER
TKS:7974

MARKET CAPITALIZATION
US\$53 billion

HEADQUARTERS
Japan

DISCLOSURES
UK Modern Slavery Act: Yes

TARGETS
None

California Transparency in Supply Chains Act: Not applicable

OVERALL RANKING

28 out of **49**

([2018 Rank](#): 24 out of 40)

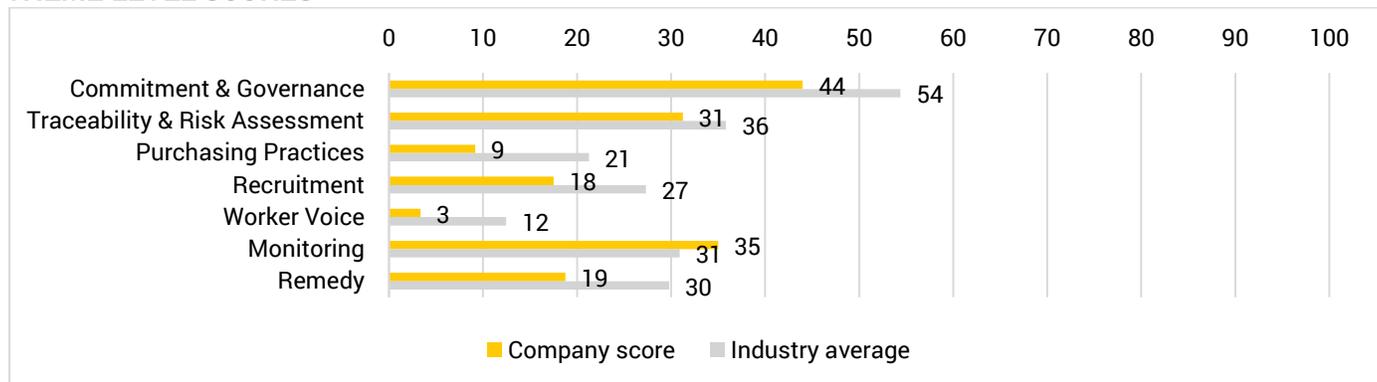
OVERALL SCORE

23 out of **100**

SUMMARY

Nintendo Co. Ltd. (Nintendo) ranks 28th out of 49 companies and discloses less information on its forced labor policies and practices than its peers. Since 2018, the company has improved by disclosing a policy prohibiting worker-paid recruitment fees, requiring employment agreements for supply chain workers in their native languages, and releasing some information on its teams responsible for relevant policies. The company's score decreased by two points, as the company did not improve its performance and disclosure across themes and because a strengthened methodology made it harder to achieve the same score. The company's score is based on some disclosure across all themes, including a higher-than-average score on the theme of Monitoring. The company has an opportunity to improve its performance and disclosure on the themes of Commitment & Governance, Recruitment, and Worker Voice.

THEME-LEVEL SCORES



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#). It includes an [allegation in the company's supply chains regarding forced labor of ethnic minorities transferred from Xinjiang to factories across other provinces in China](#), which falls outside of the research timeframe.

KEY DATA POINTS**SUPPLIER LIST**

No

NO-FEE POLICY

Yes

AVERAGE SUPPLIER SCORE

N/A

REMEDY FOR SUPPLY CHAINS WORKERS

No

HIGH-RISK SOURCING COUNTRIESChina¹

LEADING PRACTICES

None.

NOTABLE FINDINGS

Supplier Code of Conduct: Nintendo discloses its CSR Procurement Guidelines, which prohibit forced labor in its supply chains. It reports that the policy, which is integrated into supplier contracts, was most recently updated in August 2019.

Recruitment: The company's supply chain policy states that workers "will not be obligated" to pay recruitment or related fees for their employment. The policy also prohibits passport retention and requires that workers are provided with employment agreements in their native languages prior to employment.

Monitoring: Nintendo discloses its monitoring process for suppliers, which includes documentation relating to labor management, worker contracts, and wage slips. It reports that the process also includes interviews with workers and visits to factories, including production facilities and dormitories. It states that monitoring is conducted by both its own employees and external auditors "with extensive experience related to the detection and assessment of forced labor."

OPPORTUNITIES FOR IMPROVEMENT

Commitment & Governance: The company is encouraged to engage with relevant stakeholders on forced labor and human trafficking (e.g., policy makers, worker rights organizations, or local NGOs) in countries in which its suppliers operate. The company is also encouraged to participate actively in one or more pertinent multi-stakeholder or industry initiatives.

Recruitment: To avoid the exploitation of migrant workers in its supply chains, the company is encouraged to ensure that employment and/or recruitment agencies used in its supply chains are monitored. It may also consider providing details of how it supports responsible recruitment in its supply chains (for example, by sharing due diligence findings on recruitment fees with peers or by supporting the development of responsible recruitment schemes).

Worker Voice: To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in which workers in its supply chains are able to pursue alternative forms of organizing. In addition, to prevent forced labor in its supply chains, the company is encouraged to work with relevant stakeholders to engage with and educate workers in its supply chains on their labor rights.

ENGAGED WITH KNOWTHECHAIN

Yes ([Provided Additional Disclosure](#)).

¹ The US Department of Labor lists China as a country where electronics may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor](#)."