

# Nintendo Co. Ltd. (Nintendo)

**TICKER**  
7974

**MARKET CAPITALIZATION**  
US\$51.6 billion

**HEADQUARTERS**  
Japan

## DISCLOSURES

[UK Modern Slavery Act:](#) Yes

[Australia Modern Slavery Act:](#)  
Yes (Disclosure of Subsidiary)

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

## OVERALL RANKING

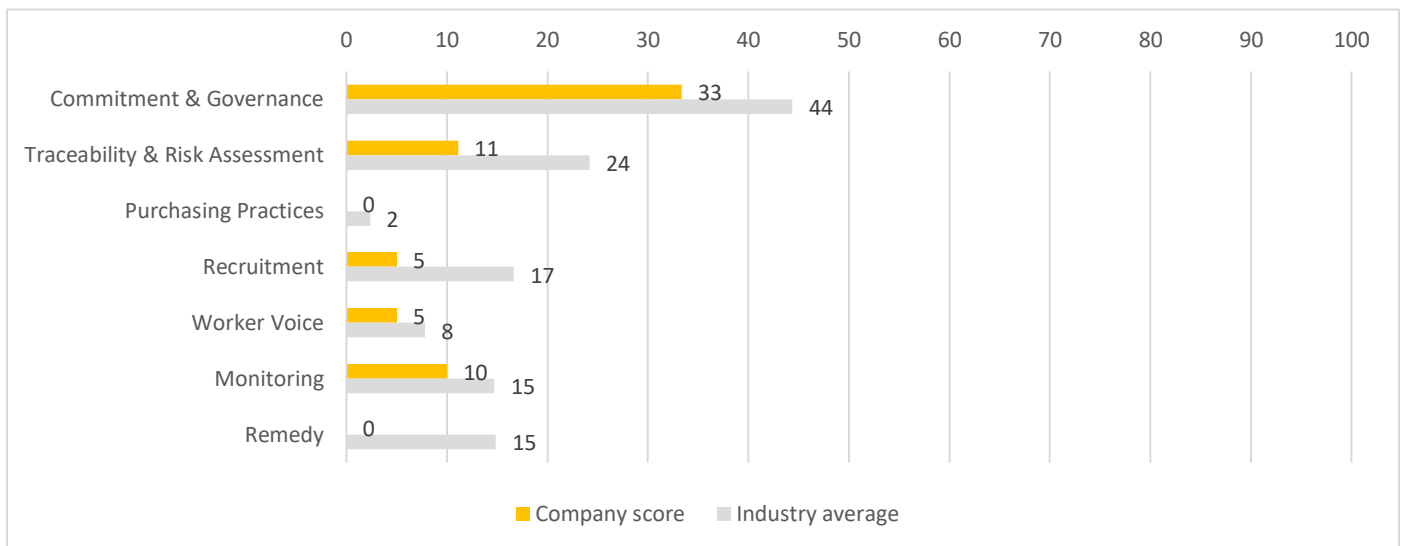
**41** out of **60**

([2020 Rank](#): 28 out of 49)

## OVERALL SCORE

**11** out of **100**

## THEME-LEVEL SCORES



## KEY DATA POINTS

### SUPPLIER LIST

No

### RISK ASSESSMENT

No

### ENGAGED WITH KNOWTHECHAIN<sup>1</sup>

Yes

### ALLEGATIONS OF FORCED LABOUR

Yes

### NO-FEE POLICY

Yes

### REMEDY FOR SUPPLY CHAIN WORKERS

No

### HIGH-RISK SOURCING COUNTRIES

China

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## SUMMARY

Nintendo Co. Ltd. (Nintendo) ranks 41<sup>st</sup> out of 60 companies. Since 2020, the company has improved on theme of Commitment & Governance by updating its supplier code of conduct to strengthen protection of the right to freedom of association and collective bargaining. However, the company did not improve disclosure or performance across other themes. The company performed particularly poorly on the themes of Purchasing Practices on Remedy. As such, the company's score has dropped by 12 points. KnowTheChain identified one allegation of forced labour in the company's supply chains.<sup>2</sup> The company is encouraged to improve its performance and disclosure on the themes of Traceability & Risk Assessment, Recruitment, and Remedy.

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## LEADING PRACTICES

None.

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## OPPORTUNITIES FOR IMPROVEMENT

**Traceability & Risk Assessment:** While the company discloses the use of self-assessment questionnaires to assess risk at suppliers, the company is encouraged to adopt and disclose a comprehensive risk assessment process that assesses forced labour risks across different tiers of its supply chains, including detail on sources used and stakeholders engaged. The company is further encouraged to disclose forced labour risks identified across supply chain tiers, and how it engages with relevant stakeholders to address forced labour risks identified.

**Recruitment:** The company discloses a policy prohibiting the charging of recruitment fees to supply chain workers, but it does not state who should bear the costs instead. The company is encouraged to require that such fees are paid by the employer ("Employer Pays Principle") and disclose how it ensures the implementation of this through the prevention of fees in its supply chains: such as through mapping of migration corridors and labour agencies used by suppliers, specialised monitoring for fees, and evidence of supplier payment of fees to labour agencies directly.

**Remedy:** The company may consider establishing a process to ensure that remedy is provided to workers in its supply chains in cases of forced labour and disclosing details on this process, such as responsible parties, approval procedures, timeframes, and, crucially, engagement with affected stakeholders. To demonstrate to its stakeholders that it has an effective remedy process in place, the company is encouraged to disclose examples of remedy provided to its suppliers' workers, including in the case of allegations.

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<sup>1</sup> For further details on high-risk raw materials and sourcing countries, see KnowTheChain's [2022 ICT benchmark findings report](#). Research conducted through June 2022 or through September 2022, 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](#).

<sup>2</sup> For more information on the allegations, and the disclosures the company made about its response to those allegations, see the full dataset [here](#).