

Modern Slavery Act Transparency Statement for FY2024

Pursuant to Section 54 of the United Kingdom's Modern Slavery Act 2015, Bandai Namco Holdings Inc. (hereinafter 'the Company') has prepared the following statement with respect to measures to prevent slavery, human trafficking, and other violations of human rights in the businesses and supply chains of the Bandai Namco Group (hereinafter, 'the Group').

1. The Group's Organisation Structure, Business Overview, and Supply Chain

In accordance with Bandai Namco's Purpose, 'Fun for All into the Future', the Company and the Group aim to work together with people around the world to continue creating a future for everyone where people and societies are connected with dreams, fun and inspiration.

In FY2024, the Group conducted business activities under the management of the Company (head office: Minato-ku, Tokyo, Japan), which is a pure holding company, and in accordance with the IP axis strategy, which aims to maximise the value of IPs (characters and other intellectual properties) by delivering the best products and services at the best possible times. These business activities were conducted through four business segments: the Digital Business, Toys and Hobby Business, IP Production Business, and Amusement Business, and through affiliated business companies, which mainly serve a supporting role for the business segments. In each business segment, the company designated as the business management company led the way in developing and implementing business strategies in Japan and globally.

Below is a summary of the main business activities in each of our business segments, as well as their business management companies (as of 31 March 2025).

- Digital Business (Business Management Company: Bandai Namco Entertainment Inc.)
Planning, development, and distribution of network content; planning, development, and sales of home gaming content, etc.
- Toys and Hobby Business (Business Management Company: Bandai Co., Ltd.)
Planning, development, manufacture, and sales of toys, capsule toys, cards, confectionery and food products, apparel, household goods, plastic models, giveaways, stationery, etc.
- IP Production Business (Business Management Company: Bandai Namco Filmworks Inc.)
Planning, production, and operation of animated works and other video and music content; management and operation of copyrights; discovery and development of artists; live entertainment business
- Amusement Business (Business Management Company: Bandai Namco Amusement Inc.)
Planning, development, production, sale, and after-sales service of amusement machines; planning and operation, etc., of amusement parks, indoor playgrounds, and other amusement facilities

The Group consists of the Company (headquartered in Japan), 100 subsidiaries, and 14 affiliated companies, and does business with offices located in 27 countries and regions around the world (as of 31 March 2025). In

addition, the number of consolidated employees of the Group, comprising the Company and 79 consolidated subsidiaries, is 10,248 (as of 31 March 2025).

For more information on the Group's organisational structure and business operations, please visit one of our websites below.

<https://www.bandainamco.co.jp/about/organization.html> (Japanese)

<https://www.bandainamco.co.jp/en/index.html> (English)

Suppliers of the Toys and Hobby Business are located in Japan, China, Vietnam, Thailand, Laos, South Korea, the Philippines, Indonesia, and Singapore. The final assembly plants of the Amusement Business are located in Japan and China.

We are currently working to gain a deeper understanding of the value chains of our core businesses through our tier one suppliers, with a view to complying with the EU's sustainability-related legislation. Looking ahead, we will clarify how the Bandai Namco Group is involved with society and the environment by collaborating with an even wider range of stakeholders as necessary, thereby promoting more effective initiatives.

2. The Group's Human Rights Policy

Policies Related to Working Conditions and Supply Chain Management

The Group is committed to the long-term development of society and the Company by fostering a work environment in which employees and all persons associated with the Bandai Namco Group have mutual respect and can work with joy and passion.

The Bandai Namco Group recognises that corporate business activities can have an impact on human rights, and we believe it is our corporate responsibility to respect the human rights of all stakeholders involved in the Bandai Namco Group's operations. The Group, guided by its Purpose 'Fun for All into the Future', which envisions a future in which entertainment enriches lives and connects people with each other, society, and the world, aims to create this future together with people all over the world. To fulfil our responsibility to respect the human rights of all stakeholders involved in our operations, we established and publicly released the 'Bandai Namco Group Human Rights Policy' in November 2023.

This policy applies to all officers and employees of the Bandai Namco Group, and it also requires the understanding, support, and compliance of all partner companies and suppliers. It emphasises promoting human rights initiatives based on the 'United Nations Guiding Principles on Business and Human Rights (UNGPs)' and the 'Children's Rights and Business Principles (CRBP)'. The policy also outlines key actions such as appointing the Chief Sustainability Officer (CSO) to oversee its implementation, establishing and continuously conducting human rights due diligence, providing appropriate education to all officers and employees, consulting with outside experts, engaging in dialogue and consultation with relevant stakeholders, and disclosing information.

For more information on the Bandai Namco Group Human Rights Policy, please visit one of our websites below.

<https://www.bandainamco.co.jp/sustainability/human-rights/index.html> (Japanese)

<https://www.bandainamco.co.jp/en/sustainability/human-rights/index.html> (English)

Additionally, as an update from the previous fiscal year's statement, the Group published the Bandai Namco Group Code of Conduct in March 2025 to continue creating a future that is connected by 'Dreams, Fun and Inspiration' together with all people around the world.

The Bandai Namco Group Code of Conduct contains the principles of conduct that we expect not only all executives and employees but also all business partners to adhere to. It describes compliance requirements in business operations, with the goal of resolving issues related to sustainable procurement throughout the entire supply chain.

The Code of Conduct reflects our recognition that fulfilling social responsibilities by complying with all laws and their letter, regardless of country or region, pursuing profits through fair and free competition, and contributing to society at large through corporate activities are universal and important missions imposed on a company that builds relationships of trust with society and plays a leading role in realising a sustainable society. It also clearly states that the lives and bodies of employees must be prioritized, and that a safe and comfortable working environment must be provided. The presidents of all operating companies within the Group have submitted a pledge to the Company's president regarding compliance with the Code of Conduct.

As part of our efforts to raise awareness within the Group, we hold seminars and e-learning sessions for our Group employees to promote understanding of the Code of Conduct and its prohibitions on forced labour, child labour, and inhumane treatment.

To further promote awareness of the Code of Conduct, during FY2025 we plan to create explanatory videos and posters, translate them into multiple languages, and distribute them to executives and employees as well as stakeholders around the world.

We have also established and publicly released the 'Bandai Namco Group Guidelines for Business Partners' as a guide for our business partners to implement the Bandai Namco Group Code of Conduct.

We disclose documents on our website and provide explanations at supplier conferences and other events in an effort to prevent human rights violations, such as forced labour and human trafficking, in the Group's businesses and supply chains.

These guidelines, based on the Responsible Business Conduct Guidelines of the Japan Electronics and Information Technology Industries Association (JEITA) and others, clearly state the prohibition of forced labour, slavery, and human trafficking.

For more information on the Bandai Namco Group Code of Conduct and the Bandai Namco Group Guidelines for Business Partners, please visit one of our websites below.

<https://www.bandainamco.co.jp/sustainability/management/supply-chain/index.html> (Japanese)

<https://www.bandainamco.co.jp/en/sustainability/management/supply-chain/index.html> (English)

3. Due Diligence Initiatives for Businesses and Supply Chains

Systems Established

The Group has established a Group Sustainability Committee chaired by the President and Representative Director and comprised of full-time directors and presidents of business management companies, etc. The committee is responsible for formulating and promoting policies and strategic objectives related to sustainability issues, including human rights, for the Company and the Group.

In addition, we have appointed a director in charge of sustainability within the Company and have established a Sustainability Management Department to oversee sustainability activities across the entire Group, in an effort to promote activities related to sustainability issues, including human rights. Reports on implemented activities and future policies are given regularly to the Company's Board of Directors, and discussions are held during their meetings in order to assess and improve these efforts.

Regarding human rights, the President and Representative Director are designated as the person responsible for the Group's Human Rights Policy, while the Chief Sustainability Officer (CSO) serves as the officer in charge of promoting the policy. Together, they lead efforts to respect human rights in accordance with this policy.

Further, the Group has appointed a director in charge of compliance within the Company to manage overall compliance. Moreover, in the event of a compliance violation or the potential for a violation within the Group, the Group Compliance Committee, chaired by the President and Representative Director and comprised of full-time directors (including Audit & Supervisory Committee members) and others appointed by the chairperson, immediately discusses and determines the most appropriate response to the situation. Five global regional management companies also provide compliance support in various regions.

In addition, as countermeasures for compliance violations, each Group company has established internal regulations, and each Group company has established and operates a whistle-blowing system. These efforts are based on the 'Bandai Namco Group Policies', which span the Group laterally. If any type of compliance violation, including such violations of human rights as forced labour or child labour, comes to light through its whistleblowing system, each company responds in a manner appropriate to the matter based on each Group company's compliance regulations.

Status of Efforts for Maintaining and Improving Supply Chain Management at Each Group Company

The Group applies measures in each business segment to maintain and improve supply chain management, and implemented the following examples of measures in FY2024.

Bandai Co., Ltd. (the business management company in charge of the Toys and Hobby Business) and the main company Bandai Spirits Co., Ltd. (both wholly owned subsidiaries of the Company), conducted Bandai Factory Audits (BFA), which combine a 'Quality Audit' and a 'Code of Conduct (CoC) Audit', or confirmed CoC items using Sedex Members Ethical Trade Audits (SMETA), International Council of Toy Industries (ICTI) reports, or other 'thirdparty CoC standards reports', at almost all global final packaging plants that manufacture products for the Japanese market (about 310 plants in FY2024). BFAs were conducted using a proprietary 'BFA Manual', with the Bandai CoC Declaration, which declares compliance with criteria related to forced labour, child labour, working hours, wages and allowances, disciplinary actions, discrimination, etc., as the basic policy. Supplier conferences are also held to share information with partner companies, etc., and efforts are made to ensure that suppliers

comply with laws and regulations and take measures to improve working conditions, including the prohibition of forced labour and modern slavery, etc.

In the case of plants that have not passed the aforementioned BFA or acquired third-party certification, Bandai Spirits Co., Ltd., conducts audits in accordance with the stipulations of their proprietary 'Bandai Spirits Minimum Requirements Audit Sheet'. These audits verify requirements related to human rights.

Bandai (Shenzhen) Co., Ltd., which provides production and quality guidance regarding major products for Europe and the U.S., conducts its business mainly in accordance with the unified standards set by ICTI for toy manufacturers. These standards include prohibitions against forced labour, human trafficking, and child labour, as part of the 'ICTI Ethical Supply Chain Program'. In addition, Bandai (Shenzhen) Co., Ltd. conducts business with plants certified by third-party organisations such as Sedex Members Ethical Trade Audit (SMETA). (All primary plants involved in the production of products for European and U.S. markets in FY2024 have been certified.)

Bandai Namco Amusement Inc. (a wholly owned subsidiary of the Company), the business management company in charge of the Amusement Business, only does business with suppliers that have been confirmed to be free of illegal activities with respect to forced labour, child labour, working hours, wages and allowances, disciplinary actions, discrimination, and environmental protection, which are evaluated before doing business with any supplier. The Company interviews arcade game product assembly plants with which it is starting a new transactional relationship, regarding any matters requiring verification, including the working environment. In addition, as necessary, the Company conducts audits of plants with which the Company is starting new transactions or currently engages in transactions. (In FY2024, we conducted three audits of plants with which the Company started new transactions.)

For more information on FY2024 measures regarding the working environment in the supply chain, please visit one of our websites below.

https://www.bandainamco.co.jp/sustainability/materiality/workplace/supply-chain_labor.html (Japanese)

https://www.bandainamco.co.jp/en/sustainability/materiality/workplace/supply-chain_labor.html (English)

4. Risk Assessment and Countermeasures of Businesses and Supply Chains

The Group has long been engaged in efforts to identify and assess negative impact on human rights, including the risk of modern slavery, within our key business operations and supply chains as part of our human rights due diligence. These efforts have been carried out with the support of third-party organisations.

In the fiscal year ended March 2024, we mapped out the human rights issues that should be prioritized for the Group across all of our Japan and global businesses. We have analysed that human rights issues such as child labor, forced labour, and the rights of foreign workers are of high priority in relation to modern slavery risks.

In the future, to promote human rights due diligence initiatives encompassing the Group using a risk-based approach, we will continue to develop and implement a human rights due diligence system based on dialogue and consultation with relevant stakeholders, aimed at identifying, preventing, and mitigating negative impact on

human rights related to our business activities.

Bandai Co., Ltd., the business management company in charge of the Toys and Hobby Business, and the main company Bandai Spirits Co., Ltd. conduct audits, such as the previously mentioned BFA, or similar audits, once a year at global final packaging plants. Furthermore, in addition to conducting audits, Bandai Spirits Co., Ltd., separately gathers information about countries and regions with potential risks, and interviews are conducted at plants in those areas. The results of the audits indicated that there have been no reports of problems related to modern slavery or human trafficking.

5. Effectiveness of Methods Established to Prevent Slavery and Human Trafficking in Operations or Supply Chains

Bandai Co., Ltd., the business management company in charge of the Toys and Hobby Business, and the main company Bandai Spirits Co., Ltd. conduct the aforementioned BFAs or similar audits once a year to ensure that human rights violations do not occur and that measures remain effective.

Bandai Namco Amusement Inc., the business management company in charge of the Amusement Business, conducts regular supplier audits to ensure that human rights violations do not occur and that measures remain effective.

6. Relief Measures in Our Businesses and Supply Chains

Each company in the Bandai Namco Group has established its own internal regulations and operates its own whistleblowing system as a consultation point for employees. If an employee discovers a violation of laws and/or regulations, they are required to consult with their supervisor or report it to an external consultation point, an internal consultation point, or an Audit & Supervisory Committee member through the whistleblowing system (hotline). In accordance with the Whistleblower Protection Act and other laws, we take care to ensure that employees do not suffer any disadvantage for reporting.

In addition, with regard to relationships with parties other than Group employees, we have established a Compliance Hotline to accept reports from all parties involved in the Bandai Namco Group's supply chain, including business partners, workers in the supply chain, and customers. This serves as a contact point for external stakeholders to provide specific information on cases where officers or employees of Bandai Namco Group companies have engaged in legal violations or misconduct, or in conduct that deviates (or may deviate from) the Bandai Namco Group Code of Conduct or the Bandai Namco Group Human Rights Policy during the course of the Group's business activities. In case a report is received, we will implement corrective and remedial measures for any negative impacts as necessary.

Through these measures, the Group is promoting human rights relief and remediation efforts.

For more information on the whistleblowing system and Compliance Hotline in FY2024, please visit one of our

websites below.

Internal Whistleblower Systems:

<https://www.bandainamco.co.jp/sustainability/governance/risk/compliance.html#anchor-internalsystem>

(Japanese)

<https://www.bandainamco.co.jp/en/sustainability/governance/risk/compliance.html#anchor-internalsystem>

(English)

Compliance Hotline:

<https://www.bandainamco.co.jp/cgi-bin/sustainability/index.cgi/complianceHotline/index> (Japanese)

<https://www.bandainamco.co.jp/cgi-bin/sustainability/index.cgi/en/complianceHotline/index> (English)

7. Training

To ensure awareness of the Bandai Namco Group Code of Conduct, we conducted e-learning for all Group officers and approximately 14,000 employees, and posted the Code of Conduct on our Group information sharing website, along with videos that clearly explain its contents. We are also working to ensure that the Code of Conduct is widely understood within the Group by displaying informative posters in our offices both in Japan and globally as well as through other means. In addition, the presidents of all operating companies within the Group have submitted a pledge to the Company's president regarding their compliance with the Code of Conduct.

Furthermore, in FY2024, we held e-learning courses on compliance five times a year for all Group officers and approximately 14,000 employees, with a total of approximately 70,000 people having taken part to date. In parallel, we conducted various in-house training programmes, including training for new employees, as part of efforts to raise awareness of compliance.

In March 2025, Bandai Namco Holdings held a briefing session for its employees in Japan on the Bandai Namco Group Code of Conduct and the Bandai Namco Guidelines for Business Partners, where we distributed the Code of Conduct, explained how to educate business partners, and outlined our future human rights due diligence efforts.

As for supplier training, Bandai Co., Ltd., the business management company in charge of the Toys and Hobby Business, holds quality study sessions for suppliers four times a year. It also holds a conference for suppliers specifically focused on BFA once a year. In FY2025, the company will communicate information about BFA and provide explanations of the Bandai Namco Group Code of Conduct and the Bandai Namco Group Guidelines for Business Partners. It will also distribute posters of the Code of Conduct and screen and share explanatory videos, thereby further promoting this initiative.

Bandai Spirits Co., Ltd. holds communication meetings for suppliers focusing on quality and related matters twice each year. In addition, the company holds annual exhibitions related to quality, etc., both in Japan (one location) and globally (two locations), where it exhibits and shares information related to human rights as needed.

Further, Bandai Namco Amusement Inc., the business management company in charge of the Amusement

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Business, actively promotes the acquisition of Japan Amusement Industry Association (JAIA) Youth Advisor certification, with the aim of deepening knowledge and ensuring appropriate measures for the healthy development of young people. Currently, 99% of employees assigned to amusement facilities have obtained this certification.

8. Going Forward

We will build a human rights due diligence mechanism within the Group to identify, prevent, and mitigate negative impact on human rights related to the Group's business activities. This mechanism will take a risk-based approach and will be continuously implemented.

9. Approval by the Board of Directors

I, Yuji Asako, hereby certify that the information contained in the above 'Modern Slavery Act Transparency Statement for FY2024' is factual and has been approved by the Company's Board of Directors.

30 September 2025

President and Representative Director
Bandai Namco Holdings Inc.

