

Anti-Slavery and Human Trafficking Statement (the “Statement”)

September 2022

This statement is made on behalf of SEGA Europe Limited (“**SEGA**”) and SEGA Publishing Europe Limited (“**SPEL**”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) and constitutes our slavery and human trafficking statement. The Statement details the action taken by SEGA and SPEL (together the “**SEGA Companies**”) up to September 2022 to prevent modern slavery and human trafficking in the SEGA Companies’ business and supply chain.

Slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and related forms of workplace abuse. In this Statement, we use the terms “slavery and human trafficking” to include all forms of slavery, servitude and forced or compulsory labour, and human trafficking.

Our structure, business and operations

SEGA is a limited liability company registered in England and Wales (registered number 0166905). SPEL is a limited liability company registered in England and Wales (registered number 05562700). SPEL is a fully-owned subsidiary of SEGA and both companies are subsidiaries of SEGA Corporation, a Japanese video games company and part of the SEGA Sammy group of companies. As one of the leading interactive entertainment companies, the SEGA group cultivates creative talent worldwide with offices in America, Japan and our European HQ in London which was established in the 1980s.

SEGA distributes video game software in the UK and throughout EMEA and SPEL develops and publishes such software. Whilst our business is primarily PC game based, the SEGA Companies also has a manufacturing and distribution function, a merchandise licensing business related to our intellectual property portfolio, and also deals with hardware and packaging suppliers that manufacture the video game packaging and associated products for our published games. The SEGA Companies also contract with indirect suppliers that provide a range of services including marketing and advertising services, and office supplies.

In the UK, our Chief Executive Officer, a Director of the SEGA Companies is responsible for SEGA’s compliance with modern slavery legislation. Notwithstanding, taking a proactive approach to respond to identified risks, managing commercial relationships and implementing the SEGA Companies’ compliance programme is a duty that extends to the wider business and our supply chain partners.

Our Approach

We strive to work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. Our corporate social responsibility strategy aims to improve the positive impact of our business on society and the economies of the regions where we work.

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine the right to work in the UK. We expect all employees to conduct business with honesty and integrity and we have a zero-tolerance approach to bribery and corruption. We expect the same high standards from those we work with and are committed to ensuring that there is no slavery or human

trafficking in our supply chains, or in any part of our business. The SEGA Companies co-ordinate their approach on corporate social responsibility with the parent company, headquartered in Japan which is part of the wider SEGA Sammy group of companies.

Details of SEGA Sammy's CSR policies and strategies can be found on the main SEGA Sammy website and in our [Supply Chain CSR Development Guidebook](#); [Group Code of Conduct](#); and the [Group Management Policy](#).

Together the "**SEGA CSR Policies**".

The SEGA CSR Policies establish the SEGA Companies' commitment to respect the human rights of our employees, customers, suppliers and individuals in the communities in which we operate. This commitment is further described in SEGA Sammy's Group Code of Conduct. SEGA Sammy has been developing its CSR policies since 2006 and became a signatory to the UN Global Compact in 2014.

The SEGA CSR Policies define our values and continued commitment to ethical best practices and legal compliance. These policies operate to build and maintain trust and integrity through a corporate-wide commitment to ethical behaviour. Supplier responses to our pre-contract questionnaire are taken into consideration when short-listing and where we identify concerns or past risks of modern slavery, we look to our suppliers to showcase how modifications to their commercial practices have adequately resolved these matters. Should suppliers fail to live up to our expectations or be unwilling to make any changes we may terminate our arrangements with them until such time as improvements have been made.

SEGA Sammy has a global whistleblower system to enable anonymous reporting by employees about potential regulatory violations. Whether reported internally or to specified law firms, if any wrongdoing is reported, these matters will be swiftly investigated and rectified, and steps will be taken to prevent recurrence.

At UK level, our legal team works in conjunction with our HR, licensing and procurement functions to help ensure that the aims and provisions of the Act are complied with and to manage any concerns or breaches. Our Whistleblowing Policy, available through the staff intranet enables any member of staff with genuine concerns about any wrongdoings or breaches of law to raise these concerns in confidence without fear of disciplinary action. Since the launch of our first Modern Slavery Statement in September 2016, the SEGA Companies have not received any enquiries, complaints or allegations related to slavery or human trafficking.

Compliance activities in 2021-2022

1. **Supplier Management:** internal operational changes have reduced the number of licensing partners that the SEGA Companies onboard, however, where we are engaging new licensee and commercial partners, we continue to implement a range of supply management tools that enable us to more closely examine our supply chain arrangements. Where we identify new measures that may complement our supply management tools, we will also seek to incorporate these into our existing programme. This year, the SEGA Companies have:
 - a. As part of the procurement and onboarding process, we continue to vet all our new suppliers. We carry out a risk analysis of the Tier 1 and Tier 2 suppliers based on the nature and values of the product or service. By calling for greater transparency we can ensure that the SEGA Companies and our suppliers are more accountable for the

standards that they set and that we can take collaborative action in response to any identified risks.

- b. Continued to engage with our suppliers to reinforce our commitment to continuously improving our practices to identify and eliminate any slavery and human trafficking in our supply chains. We share all our key policy documentation, which includes the SEGA Sammy Supply Chain CSR Development Guidebook and our annual modern slavery statement with each of our suppliers that enter into a contract with the SEGA Companies.
 - c. Although we have not identified modern slavery risks, should a risk be identified, we will work with our partners and suppliers to improve the standards in a way that does not have a detrimental impact on workforces.
2. **Risk Mapping:** alongside implementation of our Supplier Management tools, we are continuing to risk-map our supply chain, and are monitoring for key territorial risks which may be highlighted in resources such as the Global Slavery Index, HM Government's Annual Report on Modern Slavery, as well as making use of other resources and guidance issued from International Human Rights Organisations such as Anti-Slavery¹ and The Modern Slavery Helpline.
 3. **Contractual Obligations:** our suppliers must agree to certain contractual obligations when doing business with the SEGA Companies. Our suppliers are required to: (i) provide compliance related information; (ii) provide contractual warranties that slavery and human trafficking is not taking place in their businesses; (iii) take remedial actions for breach of the obligations related to modern slavery compliance; and (iv) provide indemnities and agree to SEGA's right to terminate for breach of the SEGA CSR Policies.
 4. **Global Engagement:** The SEGA Sammy Group in Japan continue to publish their global report on the UK Companies' efforts to tackle modern slavery, which acts to raise the profile of the measures and procedures in place across the business to promote proper business practices in compliance with the laws relating to modern slavery and human trafficking. The SEGA Sammy Group statement can be found [here](#).
 5. **Voluntary Standards and Recognition:** we continue to value and prioritise suppliers and partners that have voluntarily or contractually signed up to ethical trade programmes such as:
 - a. The Supplier Ethical Data Exchange (Sedex);
 - b. Sedex Members Ethical Trade Audit (SMETA);
 - c. BSCI (Business Social Compliance Initiative);
 - d. Worldwide Responsible Accredited Production (WRAP);
 - e. Fair Labour Association; and
 - f. Responsible Supplier Charters.

Future Plans

1. Internal engagement and reformulation of our supplier onboarding programme to take account of regional policies and legislation in the territories that we operate within. We will be providing tailored e-learning to licensing and procurement teams on how to recognise and deal with modern slavery in the workplace and business supply chain.

¹ <https://www.antislavery.org/about-us/>

2. We will continue to extend the scope of our due-diligence measures by working closely with our suppliers to understand lower tier risks, and the wider operation of their businesses and to include non-stock suppliers and service providers in our supply chain mapping strategy.
3. We continue to review our entire procurement and licensing processes and will be introducing further specific measures where relevant to ensure that our obligations under the Act are passed through our supply chain.
4. The SEGA Companies have signed up to the government's Contacts Database in order to utilise guidance to support the continued improvement of our activities in this area and follow the passage of the Modern Slavery (Amendment) Bill in parliament.
5. Where we identify additional training needs for our staff, we will ensure that they understand the implications of the modern slavery laws and can assist us with implementing the requirements of the Act effectively.
6. We will monitor legislative and/or policy developments in the United Kingdom that recommend new areas of best practice for anti-human trafficking and modern slavery compliance programmes.



Gary Dale
Director and Chief Executive Officer
SEGA Europe Limited and SEGA Publishing Europe Limited

30 September 2022