

SEGA SAMMY Group Human Rights Policy

1. Commitment to Respect for Human Rights

The SEGA SAMMY Group provides entertainment under our group mission and purpose: “Captivate the World -Making Life More Colorful-.” In order to continue our business operations, we need to take into account the human rights impact of such activities and address the negative impacts. The SEGA SAMMY Group has established the SEGA SAMMY Group Human Rights Policy (the “Policy”) and is determined to continue to promote initiatives to respect the human rights of all people involved in our business activities in order to ensure that the SEGA SAMMY Group is a corporate group that is and will continue to be trusted, needed, and respected by society. The Policy is positioned as the highest-level policy on human rights of the SEGA SAMMY Group.

2. Compliance with Laws, Regulations, and Norms related to Respect for Human Rights

In light of the laws and regulations of each country and region, the SEGA SAMMY Group respects human rights in accordance with the United Nations' Guiding Principles on Business and Human Rights.

We comply with the laws and regulations applicable in countries and regions in which we operate, and respect internationally recognized human rights. Where there is a conflict between national and regional laws and internationally recognized human rights, we will pursue respect for human rights based on whichever is more stringent under the circumstances.

3. Scope of Application

The Policy applies to all executives and employees of the SEGA SAMMY Group (SEGA SAMMY HOLDINGS INC. and its group companies).

We also expect all business partners, including suppliers, to understand the Policy and work to respect human rights.

4. Promotion System

The President and Group CEO is responsible for the Policy, and the head of the Corporate

Planning Division of SEGA SAMMY HOLDINGS INC. is responsible for its promotion. The Group Sustainability Subcommittee, chaired by the President and Group CEO, has been established within the Group Management Committee to promote initiatives to respect human rights in accordance with the Policy.

5. Education

The SEGA SAMMY Group will reflect the Policy in its related policies, codes, and regulations so that it is firmly established in all corporate activities.

The SEGA SAMMY Group will also conduct appropriate education and awareness activities for all executives and employees of the Group and strive to promote understanding among business partners, including suppliers.

6. Human Rights Due Diligence

The SEGA SAMMY Group will establish and continuously promote a human rights due diligence mechanism to identify and prevent or mitigate negative impacts on human rights. We will also monitor and evaluate the progress of our initiatives to eliminate negative human rights impacts and continuously improve the same.

7. Remedies

In the event it is found that the SEGA SAMMY Group has caused or been involved in negative human rights consequences, we will work to remedy the matter through appropriate procedures.

8. Dialogue and Consultation with Stakeholders

The SEGA SAMMY Group consults with experts on human rights within and outside the Group and engages in dialogue and consultation with potentially affected stakeholders.

9. Disclosure of Information

The SEGA SAMMY Group will disclose its initiatives to respect human rights via its corporate

website and integrated reports.

The Policy was approved by the Board of Directors of SEGA SAMMY HOLDINGS INC. on September 30, 2024.

September 30, 2024
SEGA SAMMY HOLDINGS INC.
Haruki Satomi, President and Group CEO