Statement on the UK Modern Slavery Act (the "**Statement**")

This Statement is made pursuant to Section 54 of the UK Modern Slavery Act (the "**Act**") and reports the measures taken during the financial year ended 31 March 2026 to prevent modern slavery, forced labour and human trafficking in the business activities and supply chain of the SEGA SAMMY Group (the "**Group**"). SEGA SAMMY HOLDINGS INC. (the "**Company**") is a holding company headquartered in Japan and the ultimate parent company of the reporting entities within the Group.

1. Business overview, organisational structure and supply chain

Business overview and organisational structure

The Group consists of the Company, 114 Group Companies and 14 Affiliated Companies and operates its business mainly through the following three businesses, with operations in Japan, Asia, Europe and the United States. As of 31 March 2026, the Group had 9,237 consolidated employees worldwide.

- Entertainment Contents Business
  Principal Group Companies: SEGA CORPORATION, SEGA FAVE CORPORATION, SEGA Europe Limited and SEGA of America, Inc.
  The Entertainment Contents Business is structured around three business areas: Consumer, Animation and AM&TOY. It plans, develops, produces, sells and operates a broad range of entertainment-related content, products and services globally, including game-related content for home video game consoles, smart devices, PCs and other platforms, amusement machines, animation, toys and licensed products.
  SEGA Europe Limited is located in the United Kingdom and serves as the headquarters for the Group's European business. It has subsidiaries in the United Kingdom, including SEGA Publishing Europe Limited, The Creative Assembly Limited and Sports Interactive Limited.

- Pachislot & Pachinko Machines Business
  Principal Group Company: Sammy Corporation
  This business handles the development, manufacture and sale of pachislot and pachinko machines.

- Gaming Business
  Principal Group Company: SEGA SAMMY CREATION INC.
  This business handles online gaming-related businesses, the operation of integrated resorts, and the development, manufacture and sale of gaming machines.

The Group has established the Group Sustainability Subcommittee (the "**Subcommittee**"), which handles sustainability-specific matters, including human rights issues within the Group Management Committee, which discusses, and reviews specific matters delegated by the Company's Board of Directors. The Subcommittee is chaired by the President and Group CEO and regularly holds management-level discussions on the formulation of Group policies and targets relating to the Group's environmental, social and governance matters, as well as the status of initiatives undertaken by Group Companies.

Human rights initiatives are shared with Group Companies and promoted through the Subcommittee based on policies determined by the Company's Board of Directors.

For more information on business overview, please refer to the following URL:
https://www.segasammy.co.jp/en/

Supply chain

The Group's supply chain includes business partners that provide a range of services, such as consulting, marketing, advertising services and office supplies. In the Entertainment Contents Business, the supply chain also includes contract manufacturers of prize merchandise and toy products, suppliers of software and hardware, and manufacturers of game packaging and related products.

2. Policies on preventing forced labour and human trafficking

The Group has established "Captivate the World -Making Life More Colorful-" as its group mission and purpose and defines its purpose as creating a society full of "captivating experiences" and "empathy" through entertainment and providing colour to the lives of people around the globe. To achieve this, the Group must respect the human rights of all people involved in its business activities, prevent and mitigate adverse human rights impacts, and appropriately address such impacts if they arise.

The Company has long promoted initiatives to respect the human rights of all people involved in the Group's business activities, including by signing the United Nations Global Compact ("**UNGC**") and declaring support for the UNGC's Ten Principles.

In September 2024, the Company established the SEGA SAMMY Group Human Rights Policy as the highest-level policy on human rights in the Group, to clarify the Group's approach to respecting human rights and promote related initiatives across the Group.

In addition, to prevent human rights violations such as forced labour, child labour and human trafficking, the Group has established and published the SEGA SAMMY Group Code of Conduct, the SEGA SAMMY Group Management Policy and the SEGA SAMMY Group Sustainable Procurement Guidelines as Group policies and guidelines. These policies and guidelines are published in multiple languages on the Company's corporate website.

- SEGA SAMMY Group Human Rights Policy
  https://www.segasammy.co.jp/en/sustainability/group-sustainabilitymateriality/human/humanrights/#001

- SEGA SAMMY Group Code of Conduct
  https://www.segasammy.co.jp/en/corp/conduct/

- SEGA SAMMY Group Management Policy
  https://www.segasammy.co.jp/en/corp/conduct/policy/

- SEGA SAMMY Group Sustainable Procurement Guidelines
  https://www.segasammy.co.jp/en/sustainability/group-sustainabilitymateriality/products-services/#002

3. Human rights due diligence processes and initiatives

Based on the SEGA SAMMY Group Human Rights Policy, from the financial year ended 31 March 2026, the Group has begun building a human rights due diligence framework to identify adverse human rights impacts associated with the Group's business activities, as well as to prevent, mitigate and address such impacts, monitor and evaluate the progress of its initiatives, report on that progress, and continuously improve its initiatives.

In accordance with the human rights due diligence cycle, the Group has first been identifying and assessing human rights issues associated with its business activities. Starting with the Entertainment Contents Business, the Group has been conducting a gap analysis based on international standards and various guidelines, including the UN Guiding Principles, the OECD Guidelines for Multinational Enterprises, the OECD Due Diligence Guidance, the International Bill of Human Rights, the ILO Core Labour Standards and the RBA Code of Conduct, and others as well as a double materiality analysis using the European Sustainability Reporting Standards ("ESRS").

As examples of initiatives already implemented in response to business characteristics, in the Entertainment Contents Business, primarily in the AM&TOY business area, the Group requires that contract manufacturers of prize merchandise and toy products respect human rights and comply with the SEGA SAMMY Group Sustainable Procurement Guidelines through contracts, memoranda or similar documents when engaging them for manufacturing. In addition, with the support of a third-party organisation, the Group provides explanations of the Guidelines and checks the status of legal compliance, including items relating to forced labour and child labour. The quality control department in the same business also periodically checks conformity status and provides guidance.

In addition, in the European business locations of the Entertainment Contents Business, including those in the United Kingdom, the Group leverages insights from due diligence reviews conducted on product manufacturing outsourcing agreements and licensing agreements to enhance visibility of potential risks that may exist across multi-tier supply chains. The Group also deepens its understanding of business-specific risks through engagement with industry organisations and by learning from the best practices of other companies.

Going forward, based on the results of the ongoing Group-wide risk identification and assessment, the Group will strengthen our efforts in priority risk areas, while utilising the insights obtained in advance across each region and business.

4. Grievance mechanisms and remediation

The Group responds to reports and consultations from employees of Group Companies and from business partners.

To enable self-correction within the Group and prevent violations of laws and regulations and other misconduct, the Group has established an internal whistleblowing system for employees. The system provides investigations of reported matters, corrective measures, measures to prevent recurrence, and protection of whistleblowers, and is communicated to all employees through the company intranet and posters.

In Japan, the Group has also established a dedicated reporting channel for business partners to report misconduct or violations of laws and regulations by Group executives, employees and other personnel, as well as misconduct or violations of laws and regulations by business partners in relation to the Company's business. Both channels allow anonymous reports to be made to a third-party organisation and are designed to strictly protect the privacy of whistleblowers.

If it becomes clear that the Group has caused or contributed to adverse human rights impacts, the Group will promptly conduct investigations and provide remedy and will take corrective measures to prevent recurrence.

Since September 2016, when SEGA Europe Limited published the Group's first statement under the UK Modern Slavery Act, as far as the Group is aware, the Group has not received any enquiries, complaints or allegations related to forced labour or human trafficking.

5. Training

The Group conducts education and awareness-raising activities in accordance with the laws and regulations of the regions in which it operates and the characteristics of each business.

In Japan, in the financial year ended 31 March 2025, the Group provided E-learning using training videos featuring external experts for executives and employees of the Group, as part of general knowledge acquisition on the prevention of forced labour, child labour and human trafficking, the SEGA SAMMY Group Human Rights Policy and the Group's initiatives. Since March 2026, these training videos have been made available to view at any time.

In Europe, considering local laws and regulations and social expectations, multiple internal functions, including Learning and Development, Legal, Compliance and Sustainability, are collaborating and sharing knowledge while working to develop more structured training programmes with a view to roles that may have greater exposure to forced labour risks.

In addition, the Company holds an annual sustainability briefing session for major suppliers in the Entertainment Contents Business and the Pachislot & Pachinko Machines Business, at which it explains the Group's initiatives, including its UK Modern Slavery Act statement and the SEGA SAMMY Group Human Rights Policy.

For contract manufacturers of prize merchandise and toys in the Entertainment Contents Business, the Group provides explanations of the SEGA SAMMY Group Sustainable Procurement Guidelines through a third-party organisation and encourages initiatives to respect human rights, including the prevention of forced labour and human trafficking.

Regarding amusement machines, the Group shares its approach to respecting human rights based on the SEGA SAMMY Group Human Rights Policy through the SEGA AM Machines and Products Chemical Substances Management Standard, which is distributed to business partners, and encourages their understanding and compliance.

6. Future plans

As a future step, the Group will continue to build a human rights due diligence framework based on a risk-based approach, utilising the findings from the human rights gap analysis and double materiality analysis that commenced in the financial year ended 31 March 2026.

In building this framework, the Group will strengthen collaboration within the Group, promote the sharing of Group policies and the use of insights from each location, and work to respond effectively to priority risk areas.

The Group will continuously monitor the effectiveness of the various measures it implements to respect the human rights of all people involved in its business activities, make improvements based on such evaluations, and disclose the progress and results of its initiatives to stakeholders in a transparent manner.

This Statement has been approved by the Board of Directors of the Company, which oversees the Group as a whole, and by the Board of Directors of SEGA Europe Limited.

September 30, 2026

Haruki Satomi
President and Group CEO
SEGA SAMMY HOLDINGS INC.