

Modern Slavery Act Transparency Statement

1. INTRODUCTION

SQUARE ENIX HOLDINGS CO., LTD respects workers' human rights and strives to ensure that every worker in our business and supply chains is provided with good working conditions, fair treatment and reasonable pay.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and sets out the steps we took during the financial year 2019 ending 31 March 2020.

2. CORPORATE STRUCTURE

SQUARE ENIX HOLDINGS CO., LTD is a holding company of the Square Enix group, which provides video games and other entertainment products and services around the world including the United Kingdom (the "**Square Enix Group**").

The Square Enix Group takes our social responsibility very seriously to address the issues of slavery and human trafficking and takes a group-wide approach to combat these issues. All or part of the steps set out in this statement, therefore, have been taken by all of the companies in the Square Enix Group.

3. POLICIES

We are committed to preventing slavery or human trafficking in every part of our business or supply chains.

The code of conduct adopted by the Square Enix Group (the "**Code of Conduct**") requires our directors and employees to conduct our business with high professional and ethical standards and in compliance with applicable laws of the jurisdictions where we conduct our business.

The Code of Conduct also requires us to consider suppliers' financial conditions and track-records to ensure that contract terms between

us and suppliers are fair. It also requires us to provide a healthy and comfortable working environment to our employees and treat them fairly.

Our Group also has a whistleblowing system in place which encourages employees to report any wrongdoing including slavery and human trafficking.

A copy of the Code of Conduct is available at:

<http://www.hd.square-enix.com/eng/company/philosophy.html>

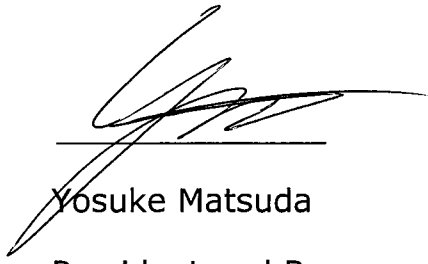
4. DUE DILIGENCE PROCESSES

Our current view is that the risk of slavery or human trafficking in our supply chains is low. We therefore are not currently conducting due diligence on our suppliers in terms of slavery or human trafficking. However, we will consider taking measures with increased scrutiny, such as audit or third party verification processes, if we find any signs of higher risks on any of our suppliers. If we suspect that a supplier is involved in slavery or human trafficking, we will investigate the supplier immediately and, if necessary, take remedial action or terminate our relationship with the supplier.

5. ACTIONS

We have introduced new provisions into the Outsourcing Management Rule to make it clear that we assure, through our compliance check, that our outsourcing vendors do not engage in slavery, child labour and human tracking. The internal audit has already started per such provisions.

This statement was pre-approved by the Board of Directors of SQUARE ENIX HOLDINGS CO., LTD.

A handwritten signature in black ink, consisting of several fluid, overlapping strokes, positioned above a horizontal line.

Yosuke Matsuda

President and Representative Director

SQUARE ENIX HOLDINGS CO., LTD

24 April 2020