

DeNA Group Human Rights Policy

September 26, 2022

Preamble

“We delight people beyond their wildest dreams” is the Mission of DeNA Co., Ltd. and all its subsidiaries (hereinafter referred to as the “DeNA Group”). The DeNA Group cooperates appropriately with a variety of stakeholders to bring Delight to many areas and create a world where people’s individuality can shine.

Under the DeNA Promise (our social promise) in Value, the DeNA Group promotes cooperation & prosperity for all, diversity, and other sustainable corporate activities. The DeNA Group also has “Respect Diversity” in DeNA Quality, the cornerstone for employee judgment to provide Delight. The DeNA Group Code of Conduct also establishes a respect for all fundamental human rights and an appreciation of cultural and/or regional differences and diversity in business operations.

Based on the above, the DeNA Group has formulated the “DeNA Group Human Rights Policy” (hereinafter the “Policy”) as the guideline promoting respect for human rights throughout the DeNA Group, and the Policy was adopted through a board of directors resolution.

The Policy applies to all officers and employees of the DeNA Group. We sincerely appreciate the understanding and cooperation of our business partners, suppliers, and other business operators with the intent and content of this Policy so that the Group can fulfill our commitment to human rights in our business activities.

1. Fundamental Principles

The DeNA Group supports human rights as set forth in international norms such as the International Bill of Human Rights (including the Universal Declaration of Human Rights), the ILO Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights, and the Ten Principles of the UN Global Compact.

2. Appreciation for Diversity and Prohibition of Harassment/Discrimination

The DeNA Group shall conduct its business operations with appreciation for regional and cultural differences and diversity, and will not tolerate any type of harassment, including, but not limited to, sexual harassment, or discrimination based on race, religion, gender, sexual orientation, gender identity, age, nationality, origin, disease, disability and/or other factors.

In addition, the Group will always strive to ensure equal opportunity, etc. in our recruitment activities and in the treatment of executives and employees.

3. Prohibition of Forced Labor/Child Labor

The DeNA Group shall not require its employees to work involuntarily, and shall not use child labor under any circumstances.

4. Management of Working Hours and Wages

The DeNA Group shall comply with all labor-related laws and regulations applicable in the countries in which it operates, and shall strive to pay appropriate wages that exceed the minimum wage, prevent overwork, and provide appropriate days off.

5. Respect for Freedom of Association and the Exercise of the Right to Collective Bargaining

The DeNA Group respects the right of employees to form labor unions and to bargain collectively in labor-management relations.

6. Safety and Health

The DeNA Group will provide a safe and healthy workplace environment for its officers, employees, and visiting partners, etc.

7. Freedom of Expression and Consideration for Privacy

The DeNA Group respects freedom of expression and privacy in transmissions and internet communications, and takes the utmost care to ensure that there is no infringement thereof.

8. Education and Training

The DeNA Group will provide its officers and employees with ongoing education and training necessary to put this Policy into practice.

9. Structure for Respecting Human Rights

The DeNA Group has established a whistleblowing hotline for consultation or report on human rights issues that arise internally. The Group Code of Conduct and internal rules specify anonymity and confidentiality for the person who made a report and prohibition on retaliatory treatment of said person. In the event of a report to the whistleblowing hotline, a summary of the report is also provided to directors, corporate auditors, the Board of Directors, and the head of the compliance and risk management department. Appropriate action will be taken against violations of laws, regulations, and internal rules including this Policy, such as correcting the violation, punishing the violator, and introducing measures to prevent recurrence.