

UK Modern Slavery Act 2015 Transparency Statement

1. About the Statement

This statement is prepared on behalf of KOEI TECMO HOLDINGS CO., LTD., a company incorporated in Japan and its affiliated companies including KOEI TECMO EUROPE LIMITED, a company incorporated in England pursuant to Section 54 of the UK's Modern Slavery Act 2015.

2. About KOEI TECMO

The KOEI TECMO Group is a game software developer, publisher, distributor and entertainment content provider based in Yokohama, Japan and conducts business in most of the major markets around the world including England.

For more information on KOEI TECMO's activities, please visit the following link:
<https://www.koeitecmo.co.jp/e/>

3. KOEI TECMO's Ethos and Principles

In fulfilling our ethos of "Creativity and Contribution," the KOEI TECMO Group strives to enrich the lives of our customers by becoming the "World's No. 1 Entertainment Content Provider" through fair and sound business operations.

KOEI TECMO's Standard Rules of Conduct lay down a set of key commitments which form the basis of the Company's compliance and risk management systems.

4. Our Approach in Relation to Slavery and Human Trafficking

At the KOEI TECMO Group, companies employ all employees of their free will and none of the employees is subject to forced or bounded labour. Every employee has the right to leave the company following a notice period which is based on the governmental regulations in each country.

We recognize that the problems of modern slavery, human trafficking and global human rights abuses are of critical concern.

Our management team is committed to developing a comprehensive approach and best practice to combat slavery, human trafficking and forced labour in every aspect of our business.

5. Further Steps

We, KOEI TECMO, believe that it is important to maintain constant vigilance against any impacts associated with slavery and human trafficking throughout our global business operations and supply chains.

In recognition of the salience of these issues, we plan to implement the necessary steps to comply with the UK Modern Slavery Act and prevent slavery and human trafficking in our global business and supply chains, including an educational program for our group employees, as well as examining our supply chains and our contractual processes.

November 2016

A handwritten signature in black ink, reading "Yoichi Erikawa". The signature is written in a cursive, flowing style with a large initial 'Y'.

Yoichi Erikawa

President & CEO

KOEI TECMO HOLDINGS CO., LTD.