

Nintendo of America's Code of Business Conduct (Summary)

Overview

Nintendo of America Inc. has adopted a Code of Business Conduct that applies to all of its employees, officers, and directors. As set forth in its Code of Business Conduct, Nintendo expects those working for and representing the company to maintain a high standard of conduct, to treat others with respect, and to conduct themselves in an ethical and professional manner. Nintendo emphasizes courtesy, dignity, respect, and safety as corporate values, and seeks to create an atmosphere of mutual respect for all Nintendo employees, temporary workers, contractors, vendors, customers, and visitors.

Conflicts of Interest

It is Nintendo's policy to conduct its business affairs ethically, fairly, and impartially. It is the responsibility of all employees, officers, and directors to avoid situations that are, or could be construed as, conflicts of interest or inappropriate attempts to influence business decisions. To that end, Nintendo prohibits its employees from accepting any gift of more than nominal value or entertainment that is more than a routine social amenity in that it could be, or could appear to be, an attempt to influence the recipient into favoring a particular customer, vendor, consultant, or other outside entity.

Insider Trading

It is against Nintendo's policy for one of its employees, officers, or directors to be involved in any way in the purchase or sale of securities of another company about which they may become aware, during the course of their employment, of confidential information that could affect the value of the securities of Nintendo or other companies with whom Nintendo does business.

Antitrust

Nintendo employees are required to comply with all antitrust laws and to always act in accordance with Nintendo's Antitrust Policy.

Foreign Corrupt Practices Act

Nintendo employees are required to comply with foreign legal requirements and United States laws that apply to foreign operations, including the Foreign Corrupt Practices Act, which generally makes it unlawful to give anything of value to foreign government officials, foreign political parties, party officials, or candidates for public office on behalf of Nintendo.

Bribery, Kickback, and Fraud

No funds or assets of Nintendo shall be paid, loaned, or otherwise disbursed as bribes, "kick-backs," or other payments designed to influence or compromise the conduct of the recipient, and no employee, officer, or director of Nintendo shall accept any funds or other assets (including those provided as preferential treatment to the employee for fulfilling their responsibilities) for assisting in obtaining business or for securing special concessions from Nintendo.

Compliance

All Nintendo employees, officers, and directors are expected to comply with Nintendo's Code of Business Conduct and to perform their work with honesty and integrity in any areas or ways not specifically addressed by the Code of Business Conduct.

If you know of or suspect a violation of any of the above policies, please notify us by email (you must include the word "Complaint" in the subject line) at codeofconduct@noa.nintendo.com. All reported information will be acted upon promptly, including reasonable steps being taken to keep confidential the identity of anyone reporting information for investigation, consistent with appropriate evaluation and investigation.