

Anti-Slavery and Human Trafficking Statement (the “Statement”)

September 2025

This statement is made on behalf The Creative Assembly Limited (“**TCAL**”) pursuant to section 54(1) of the Modern Slavery Act 2015 (the “**Act**”) and constitutes our slavery and human trafficking statement. The Statement details the action taken by TCAL up to September 2025 to prevent modern slavery and human trafficking in TCAL’s business and supply chain.

Slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and related forms of workplace abuse. In this Statement, we use the terms “slavery and human trafficking” to include all forms of slavery, servitude and forced or compulsory labour, and human trafficking.

Our structure, business and operations

TCAL is a limited liability company registered in England and Wales (registered number 03425917). TCAL is a fully owned subsidiary of SEGA Europe Limited and an affiliate of SEGA Publishing Europe Limited and Sports Interactive Limited (collectively, the “**SEGA Companies**”). The SEGA Companies are subsidiaries of SEGA Corporation, a Japanese video games company and part of the SEGA Sammy group of companies. TCAL is one of the UK’s leading video game development studios engaged in the development of world-renowned partnerships for the creation of video game content. Unless expressly stated otherwise, a reference to “TCAL”, “SEGA”, “we”, “our”, or “us” refers to the SEGA Companies, including SEGA group entities around the world.

As one of the leading interactive entertainment companies, the SEGA group contributes to the advancement of gaming culture around the world through the development of unique products and experiences that delight our ever-growing global audience. SEGA’s gaming business is centred on the development, distribution and publishing of video game software around the world. The games that TCAL develops are published and distributed in the UK and EMEA by the SEGA Companies.

SEGA also has a Transmedia business which has as its aim the expansion of its iconic game franchises through movies, series, games, products, partnerships and experiences. Alongside the development and publishing business, the SEGA Companies also deal with hardware and packaging suppliers that manufacture the video game packaging and associated products for the games. Additionally, the SEGA Companies contract with indirect suppliers that provide a range of services including consultant contractors, marketing and advertising services, and office supplies.

In the UK, the Chief Operating Officer, a Director of TCAL, is responsible for the SEGA Companies’ compliance with modern slavery legislation. However, SEGA’s position is that taking a proactive approach to respond to identified risks, managing commercial relationships and implementing the SEGA Companies’ compliance programme and delivery on SEGA’s CSR Policies (defined below) is a duty that extends to the wider business and SEGA’s supply chain partners.

Our Approach

We strive to work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. Our corporate social responsibility strategy aims to improve the positive impact of our business on society and the economies of the regions where we work.

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine the right to work in the UK. We expect all employees to conduct business with honesty and integrity, and we have a zero-tolerance approach to bribery and corruption. We expect the same high standards from those we work with and are committed to ensuring that there is no slavery or human trafficking in our supply chains, or in any part of our business. The SEGA Companies co-ordinate their approach on corporate social responsibility with our parent company, headquartered in Japan which is part of the wider SEGA Sammy group of companies.

Details of SEGA Sammy's CSR policies and strategies can be found on the main SEGA Sammy website and in our [Group Sustainable Procurement Guidelines](#); [Group Human Rights Policy](#); [Group Code of Conduct](#); and the [Group Management Policy](#).

Together the **"SEGA CSR Policies"**.

SEGA Sammy has been developing its CSR policies since 2006 and became a signatory to the UN Global Compact in 2014. The SEGA CSR Policies establish the SEGA Companies' commitment to respect the human rights of our employees, customers, suppliers and individuals in the communities in which we operate. This commitment is further described in SEGA Sammy's Group Code of Conduct. In 2024, SEGA Sammy launched its Group Human Rights Policy which outlines the SEGA group's commitment to respecting and promoting human rights across all its operations and partnerships. It demonstrates how SEGA seeks to embed human rights principles into internal policies and training programmes for staff and partners.

The SEGA CSR Policies define the SEGA group's values and continued commitment to ethical best practices and legal compliance. These policies operate to build and maintain trust and integrity through a company-wide commitment to ethical behaviour. As part of operationalising the SEGA CSR Policies, SEGA takes into consideration supplier responses to our pre-contract questionnaire(s) when short-listing and where we identify concerns or past risks of modern slavery, we engage with our suppliers to agree modifications to their commercial practices. Should suppliers fail to live up to our expectations or be unwilling to make any changes, we may terminate our arrangements with them until such time as improvements have been made.

SEGA Sammy's whistleblower system enables its employees to anonymously report potential regulatory violations. Should any wrongdoing be reported, these matters will be swiftly investigated and rectified, and steps will be taken to prevent recurrence.

At UK level, TCAL's legal team works with the HR, licensing and procurement functions to help ensure that the aims and provisions of the Act are complied with and to manage any concerns or breaches. Since the launch of TCAL's first Modern Slavery Statement in September 2018, the SEGA Companies have not received any enquiries, complaints or allegations related to slavery or human trafficking. SEGA remains committed to continuous improvement and will update our approach and policies and practices as needed, including in response to government and legislative changes.

Compliance activities in 2024-2025

1. This year, the SEGA Companies have:
 - a. Reviewed our approach to provision of our Transparency in Supply Chains Statement against the refreshed UK Home Office Guidance. We have conducted a gap analysis and identified action areas that can be addressed through a coordinated strategy and unified compliance framework which blends operational governance, cultural intelligence, and wider efforts to reduce the risk of forced labour and modern slavery taking place in our business.
 - b. Further embedded the ESG/Sustainability function to support our initiatives in this area.
 - c. Identified additional formalised training providers that can complement our organisational training efforts.
 - d. Scoped out the potential for improved ethical supply chain management within SEGA Europe's updated supplier onboarding system. This review, conducted in collaboration with the Compliance and Legal teams, identified specific opportunities to integrate ethical supply chain questions into the vendor onboarding programme. This review has also enabled the business units to explore the most appropriate channels for sharing relevant documentation (such as SEGA's CSR Policies) with targeted suppliers being onboarded. The aim is to ensure the longevity of these due diligence checks, enhance transparency, and improve alignment with suppliers who demonstrate an understanding of ethical supply chain practices and can support our intent to mitigate associated risks. As the system rollout is still underway, SEGA will reflect upon the progression of this activity in future years.
2. **Risk Mapping:** The SEGA Companies have begun to lay the groundwork for a Double Materiality assessment; an exercise which will involve reviewing the impacts, risks, and opportunities (IROs) associated with environmental, social, and governance (ESG) metrics. These IROs will be considered across core operations and mapped throughout the company's value chain. Additionally, SEGA Sammy is planning a global Human Rights Due Diligence review. Together, these two initiatives will provide an updated view of the SEGA group's key risks and opportunities, which will be used to update and enhance risk management practices related to modern slavery.
3. **Contractual Obligations:** our suppliers must agree to certain contractual obligations when doing business with the SEGA Companies. Our suppliers are required to: (i) provide compliance related information; (ii) provide contractual warranties that slavery and human trafficking is not taking place in their businesses; (iii) take remedial actions for breach of the obligations related to modern slavery compliance; and (iv) provide indemnities and agree to SEGA's right to terminate for breach of the SEGA CSR Policies.
4. **Global Engagement:** The SEGA Sammy Group in Japan continue to publish their global report on the UK Companies' efforts to tackle modern slavery, which acts to raise the profile of the measures and procedures in place across the business to promote proper business practices in compliance with the laws relating to modern slavery and human trafficking. The SEGA Sammy Group statement can be found [here](#).
5. **Voluntary Standards and Recognition:** we continue to value and prioritise suppliers and partners that have voluntarily or contractually signed up to ethical trade programmes such as:
 - a. The Supplier Ethical Data Exchange (Sedex);

- b. Sedex Members Ethical Trade Audit (SMETA);
- c. BSCI (Business Social Compliance Initiative);
- d. Worldwide Responsible Accredited Production (WRAP);
- e. Fair Labour Association; and
- f. Responsible Supplier Charters.

Future Plans

1. Integrate a revitalised global ethical supply chain framework into our corporate due diligence processes. Through a cross-territory working group, we will seek to drive the implementation of a coordinated and centralised approach to the monitoring and management of business risks in alignment with our compliance obligations.
2. Continue to support and work alongside SEGA Sammy and SEGA Corporation on the Double Materiality Impact assessment and Human Rights Due Diligence review. Leverage this collaboration to improve our understanding of associated risks and improve the Group's overall response to modern slavery legislation
3. Incorporate refreshed training objectives for procurement and operations teams.
4. Continue collaboration across Legal and Compliance departments to integrate ethical supply chain monitoring touchpoints within SEGA Europe's onboarding system.
5. Collaborate with SEGA Corporation to continually improve our processes and work towards a unified approach to managing suppliers.
6. Monitor legislative and/or policy developments in the United Kingdom that recommend new areas of best practice for anti-human trafficking and modern slavery compliance programmes.



Jurgen Post

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The Creative Assembly Limited

29 September 2025