KONAMI
Australia

Modern Slavery Statement

Financial Year 2025–2026

Prepared pursuant to the Modern Slavery Act 2018 (Cth)

1. Introduction

Konami Australia (KAP) is committed to operating ethically and with integrity across all aspects of our business and supply chain. KAP recognises that modern slavery is a serious global human rights issue that can occur in both domestic and international operations. Modern slavery includes forced labour, debt bondage, human trafficking, child labour, and other forms of exploitation.

This Modern Slavery Statement is made pursuant to section 16 of the *Modern Slavery Act 2018* (Cth) (the **Act**) and covers the reporting period 1 April 2025 to 31 March 2026. As a reporting entity under the Act, KAP acknowledges that there is a risk that modern slavery practices may be present in our operations and supply chains, either directly or indirectly, and that identifying and addressing those risks is an ongoing process.

This is KAP's first Modern Slavery Statement. As such, this reporting period has focused on establishing a foundation for KAP's modern slavery compliance framework, including developing policies, understanding our operations and supply chains, documenting existing controls and business practices, identifying areas of potential risk and considering appropriate measures to assess and address those risks in future reporting periods.

This Statement outlines the initial potential modern slavery risks identified by KAP and how KAP intends to address those potential risks, as well as the steps to be taken by KAP to strengthen our approach to modern slavery risk management through continuous improvement, increased supply chain visibility and the development of appropriate due diligence processes.

2. Reporting Entity

2.1 Company Overview

KAP is a company limited by shares, incorporated and domiciled in Australia.

KAP's registered office and principal place of business is located a Unit 1 & 2, 111 Vanessa Street, Kingsgrove, New South Wales, 2208, Australia.

KAP is engaged in the design, manufacture, and distribution of gaming machines, electronic gaming equipment, gaming enterprise management systems and related hardware and software (technology) products. KAP conducts its operations principally in Australia and

supplies products and services to customers within Australia and selected international markets.

Key company details are set out below:

- **ACN:** 076 298 158
- **ABN:** 83 076 298 158
- **Registered address:** Unit 1 & 2, 111 Vanessa Street, Kingsgrove NSW, 2208
- **Number of employees (approx.):** 118

2.2 Ownership and Group Structure

KAP is a wholly owned subsidiary of Konami Gaming, Inc. (**KGI**) which forms part of the broader Konami Group; a multinational entertainment and gaming company headquartered in Japan. KAP forms part of the Konami Gaming business of the Konami Group, which develops, manufactures, distributes, and supports gaming machines, casino management systems, and related gaming technologies across multiple jurisdictions.

For the purposes of this Statement, the operations and supply chains of only KAP have been outlined.

3. Operations and Supply Chains

3.1 Our Operations

KAP is one of Australia's leading designers, manufacturers and suppliers of electronic gaming machines, gaming enterprise management systems and has customers in Australia and internationally.

KAP's core operations span the full product lifecycle of gaming machines, gaming enterprise management systems, and related gaming technologies, including:

- Research, design, and engineering of electronic gaming machines (including related hardware and software) gaming enterprise management systems, and related gaming technologies
- Sourcing and procurement of electronic components, mechanical parts, and display units
- Assembly and manufacturing (conducted internally and/or through contracted manufacturers)
- Quality assurance and compliance testing
- Distribution and logistics to customers in Australia and international markets
- After-sales service, maintenance, and technical support
- Sales and Marketing
- Finance and administration

KAP has offices in Sydney, New South Wales and Brisbane, Queensland. KAP's domestic workforce is subject to Australian workplace laws and employment standards, including the *Fair Work Act 2009* (Cth). We engage a mix of direct employees and contracted service providers.

All of the above functions report into the General Manager, who in turn reports to the Board of Directors.

3.2 Our Supply Chains

KAP's supply chains are complex and comprise both direct and indirect suppliers, with significant procurement of components and finished goods sourced from overseas suppliers, particularly in the Asia-Pacific region.

Our key supply chain categories include:

- Electronic components (semiconductors, PCBs, displays, sensors) primarily sourced from suppliers in China, Taiwan, South Korea, Japan, Mexico and the United States of America.
- Mechanical and cabinet components (metal fabrication, plastic moulding, cabinetry) sourced from domestic and overseas manufacturers including China and Australia.
- Gaming enterprise management systems components (servers, software, SYNK Box parts, networking equipment, IOT devices & development resources) primarily sourced from China, India, Malaysia, Taiwan, United States of America and South America.
- Software and technology services including third-party developers and licensed technology and service providers from United States of America and Taiwan.
- Logistics and freight chains consist of domestic and international freight forwarders and customs brokers.
- Facilities and professional services such as cleaning, security, labour hire, and professional services are engaged locally.

We acknowledge that supply chains of this nature, particularly those extending into manufacturing regions across Asia, carry elevated inherent risks of modern slavery. This recognition forms the foundation of our risk assessment approach and informs the steps to be taken to develop a more detailed understanding of our supply chains, documenting our existing controls and business practices, and implementing appropriate measures to address any identified risks.

4. Modern Slavery Risks

4.1 Risk Assessment Approach

As this is KAP's first reporting period, KAP has focused on establishing a baseline understanding of its operations and supply chains, including to improve visibility over supplier relationships (and the supply chains of those suppliers) and to identify and assess any modern slavery risks in that context.

During the reporting period, KAP undertook an initial assessment of modern slavery risks across its current operations and supply chains. This assessment drew on publicly available risk indices, industry guidance from the Attorney-General's Department, and engagement with key internal stakeholders including procurement, operations, and human resources.

Our risk assessment considered the following factors:

- Geography: countries of operation or sourcing with known risks of forced or child labour
- Industry sector: sectors with documented vulnerability to exploitation, including electronics manufacturing, construction, and hospitality
- Product type: goods associated with high-risk supply chains (e.g. raw materials, electronics, garments)
- Supplier relationships: the nature, depth, and transparency of our supplier relationships
- Worker vulnerability: categories of workers at heightened risk, including migrant and temporary workers

4.2 Identified Risk Areas

Based on our assessment, we have identified the following areas as presenting potential modern slavery risks:

Tier 1 & 2 Electronics Suppliers

KAP sources electronic components for gaming machines from suppliers located in China, Taiwan, South Korea, Japan and Mexico. The electronic manufacturing industry involves complex and multi-tiered supply chains extending across multiple jurisdictions with varying labour standards. Workers within these supply chains may be vulnerable to excessive working hours, restricted freedom of movement, debt bondage associated with recruitment fees, and use of student or juvenile labour, particularly in electronics manufacturing hubs in China and Southeast Asia. KAP recognises that visibility beyond its direct suppliers remains limited at this stage, and that risks may be more difficult to identify in more indirect parts of the supply chain. Further supply chain mapping will continue in future reporting periods.

Contract and Labour Hire Workers

KAP's operations and supply chains include labour hire providers, logistics operators, freight providers, cleaning and security services, and other outsourced service providers. Labour hire and subcontracting arrangements engaged through third-party labour hire agencies, including those working in our facilities or in contracted services such as cleaning and security, may be vulnerable to exploitation due to reduced visibility over employment and workplace practices. This risk applies domestically as well as in overseas manufacturing contexts.

International Logistics and Freight

International freight and logistics networks, particularly those operating through ports in high-risk jurisdictions, may involve workers subject to unsafe or exploitative conditions such as short-term contracting, migrant labour, and insecure work. Vulnerable groups include outsourced labourers, migrant and temporary visa workers, and young people.

5. Actions Taken to Address Modern Slavery Risks

5.1 Current State

KAP acknowledges that this is the first reporting period in which we have formally commenced assessment and documentation against our modern slavery risks. As such, we do not yet have a comprehensive modern slavery risk management framework in place.

During the reporting period, KAP conducted a structured process to identify, assess and address modern slavery risks within our operations and supply chains. KAP focused on improving visibility over our supply chains, strengthening governance arrangements, and developing the foundations for ongoing due diligence and remediation processes. The actions described below represent the initial steps undertaken by KAP during the reporting period to establish and develop our modern slavery risk management framework.

KAP will continue to progress and develop our modern slavery risk management framework, which will be reflected in future Statements.

5.2 Actions Underway

The following actions have been initiated or are planned for implementation during and immediately following the reporting period for this Statement:

a) Supply Chain Mapping

We have commenced mapping our Tier 1 electronics suppliers to improve understanding of the goods and services procured by KAP, the location of our suppliers, and the countries from which products and materials supplied to KAP originate. This mapping process is targeted for completion by March 2027.

This process will form part of our broader due diligence processes and will enable the identification and assessment of modern slavery risks associated with suppliers, products, services and geographic regions. As our understanding of our supply chain develops, this mapping will extend to Tier 2 suppliers in the next reporting period, with priority given to higher risk categories and areas where visibility is currently limited.

b) Supplier Due Diligence

Questionnaire

KAP has commenced development of a modern slavery supplier questionnaire to support the assessment of modern slavery risks within our supply chain.

The questionnaire is designed to collect information from our suppliers regarding:

- supplier's business operations, products and services, geographic footprint, workforce composition and role within KAP's supply chains;
- supplier's internal policies, risk management practices, governance frameworks and management systems relating to modern slavery, human rights, ethical sourcing, grievance mechanisms, and labour standards;
- labour practices within the supplier's operations, including worker recruitment, wages, working conditions, freedom of movement, child labour controls and protections for vulnerable worker groups
- supplier's processes for identifying, assessing and managing modern slavery risks within its own operations and supply chains, including due diligence, audits and site inspections;
- identification and explanation of modern slavery incidents, labour-related complaints, regulatory investigations or remediation measures identified within the supplier's operations or supply chains;

- training provided to the supplier's employees, contractors and subcontractors regarding labour standards, human rights, and modern slavery risks; and
- whether the supplier agrees to comply with KAP's Modern Slavery Policy and Supplier Code of Conduct (once implemented) or maintains equivalent policies and standards.

The questionnaire will form part of our supplier onboarding and periodic review process. KAP intends to distribute the questionnaire to priority Tier 1 suppliers by March 2027.

Third Party Due Diligence Services

KAP is considering the future implementation of compliance software provided by an independent third party to further support supplier due diligence. If implemented, the software would complement KAP's existing supplier questionnaire and strengthen its supplier due diligence processes.

c) Policy Development

During the reporting period, we commenced development of our Modern Slavery Policy (the **Policy**) and Supplier Code of Conduct (the **Code**). The Policy and the Code will be finalised and implemented by March 2027– each of the Policy and the Code will be provided to all current and future employees, directors, contractors, suppliers and other personnel involved in the conduct of our business.

The Policy will set out our commitment to identifying, addressing and preventing modern slavery risks in our business. The Policy will apply to all KAP employees, directors, contractors, labour hire personnel and suppliers, and will set out our responsibilities in relation to modern slavery risk management, supply chain due diligence, employee awareness, grievance reporting and remediation processes. It will also outline KAP's expectations regarding ethical employment practices, supplier engagement, reporting of concerns and ongoing compliance with appliable laws and human rights standards.

The Code will communicate clear expectations of suppliers, subcontractors and business partners. The Code will establish minimum standards relating to forced labour, child labour, wages and working conditions, freedom of association, workplace health and safety, non-discrimination, human rights, supply chain transparency, grievance mechanisms and ethical business conduct. The Code will also require suppliers to assist KAP in its due diligence processes, disclose relevant supply chain information and take reasonable steps to ensure equivalent standards are applied within their own supply chains.

The Policy and the Code will form the basis of our modern slavery risk management framework to identify, assess and address modern slavery risks within our operations and supply chains by incorporating modern slavery expectations into supplier onboarding and review processes and related contractual protections in new and renewed supplier agreements. It will assist KAP in taking steps to improve visibility over our supply chains, strengthening governance arrangements, and developing and maintaining ongoing due diligence and remediation processes that our supplier's management processes and business practices.

d) Internal Awareness and Training

KAP has identified employee awareness and capability strengthening as important elements of our modern slavery risk management framework.

We will deliver modern slavery awareness training for all employees, with targeted training for those involved in procurement, supply chain, and senior management, with initial training to be completed by March 2027. These training initiatives will focus on improving KAP's employees understanding of modern slavery risks, identifying, assessing and addressing those risks (including indicators), our due diligence processes, and our internal escalation pathways. It will also address more generally KAP's modern slavery obligations (including reporting obligations) and the steps being taken by KAP to identify, assess, manage and address modern slavery risks in our operation and supply chains.

e) Grievance and Reporting Mechanisms

KAP recognises the importance of accessible reporting mechanisms and appropriate remediation processes as part of an effective response to modern slavery risks and has commenced considering how these arrangements may be incorporated into our developing modern slavery framework.

KAP is reviewing our existing grievance and whistleblower channels to ensure that workers – both employees and contractors of KAP, as well as workers indirectly involved in our supply chain – have accessible, safe, and confidential means of reporting concerns about modern slavery or other labour rights violations. KAP will update existing internal reporting pathways, including grievance and whistleblower channels, by March 2027.

6. Assessing the Effectiveness of Our Actions

As this is our first modern slavery statement, the actions described in this Statement were commenced during the reporting period and are in an early stage of development and implementation. KAP does not yet have sufficient historical data to assess the effectiveness of these actions in the context of its modern slavery risk management framework. We recognise this as a priority area for development.

During the next reporting period, KAP intends to establish baseline formal key performance indicators (**KPIs**) and metrics relating to its modern slavery risk management framework, as well as processes and procedures, to monitor the effectiveness of the framework in practice. In this regard, KAP intends to establish and monitor the following KPIs and metrics:

- confirming that the Policy and the Code has been provided to all current employees, directors, contractors, suppliers and other personnel involved in the conduct of our business;
- percentage of Tier 1 suppliers mapped and assessed;
- number of suppliers who have completed and returned the supplier questionnaire;
- proportion of new supplier contracts incorporating modern slavery clauses;
- number of staff who have completed modern slavery awareness training; and
- number of concerns raised through internal reporting mechanisms and outcomes of investigations.

In the next reporting period, KAP will include information in our Statement regarding these KPIs and metrics in the context of our modern slavery risk management framework and use the results to refine and strengthen our approach.

7. Consultation

This Statement was prepared in consultation with key internal stakeholders, including members of the executive leadership team, procurement, legal, and human resources functions.

7.1 Internal Development Process

This Statement was developed through a structured cross-divisional consultation process involving an internal modern slavery working group of representatives from KAP's (internal and external) executive leadership team, procurement, legal and compliance, human resources, and operations.

As this is KAP's first reporting period, the working group sought to:

- review KAP's obligations under the Modern Slavery Act 2018 (Cth) and relevant guidance issued by the Australian Government;
- establish a baseline understanding of KAP's operations and supply chains;
- identify and assess any modern slavery risks in KAP's operations and supply chains; and
- establish and develop a modern slavery risk management framework – this includes determining the measures to be implemented by KAP to support the framework for future reporting periods with the aim of improving visibility over our supply chains, strengthening governance arrangements, and developing the foundations for ongoing due diligence and remediation processes (all of which are set out above).

The working group was responsible for commissioning the initial risk assessment, drafting this Statement, and overseeing the development of our Modern Slavery Policy and Supplier Code of Conduct.

7.2 Involvement of Other Entities

KAP does not own or control any entities and is the only entity within the broader Konami Group that is a *reporting entity* for the purposes of the Act. Accordingly, no related entities were required to be consulted in the preparation of this Statement. KAP did, however, draw on guidance from external sources in developing its practices, including the Attorney-General Department's reporting guidance, the United Nations Guiding Principles on Business and Human Rights, and International Labour Organisation Core Labour Standards.

7.3 Assessing Risks in Our Operations and Supply Chains

To assess the risks of modern slavery in our operations and supply chains, KAP conducted a structured risk assessment using a likelihood-and-impact methodology. Each supply chain category was evaluated against key risk factors including the geographic location of suppliers, the nature of the sector and workforce, the complexity and depth of sub-contracting arrangements, and the presence or absence of existing controls. This assessment was informed by publicly available risk indices – including the Global Slavery Index and the Walk Free Foundation's country risk data – as well as sector-specific research on labour risks in electronics manufacturing and contracted services. The outputs of this assessment have been documented in our Supply Chain Risk Register, which assigns inherent and residual risk ratings to each category and identifies priority actions.

7.4 Engagement with Suppliers and Third Parties

As part of our consultation process, KAP commenced direct engagement with key suppliers and third-party business partners. KAP will continue to progress its engagement with suppliers and third-party business partners to strengthen this consultation process, which will be reflected in future Statements.

KAP's engagement with suppliers and third-party business partners includes:

- the development of our Modern Slavery Supplier Questionnaire – in the next reporting period, the Questionnaire will be provided to priority Tier 1 suppliers in high-risk categories, including electronics component manufacturers and cabinet fabricators operating in China and Southeast Asia, and the results will be reflected in future Statements;
- the development of the Policy and the Code – once finalised in the next reporting period, the Policy and the Code will be shared with key suppliers and third-party business partners, and compliance with such documents will be incorporated into all new and existing (renewed) commercial contracts; and
- notifying domestic third-party service providers – including labour hire agencies, cleaning, and security contractors – of our modern slavery expectations and requesting confirmation of their compliance with applicable employment laws.

7.5 Future Consultation

KAP recognises that consultation is an ongoing and iterative process, not a one-off exercise. As our modern slavery risk management framework develops, we intend to deepen and broaden our consultation activities in the following ways:

- Internally, we will transition from a project-based working group model to embedding modern slavery oversight within our permanent internal governance structure, with a named compliance owner and regular reporting to the Board.
- Expand supplier engagement to cover all Tier 1 suppliers and, progressively, Tier 2 suppliers in high-risk categories.
- Review and follow up supplier questionnaire responses as part of our annual supplier performance cycle.
- Engage specialist external advisers and independent auditors to provide assurance over our supply chain practices.
- Explore opportunities for industry collaboration and engagement – for example, through industry associations or multi-stakeholder initiatives relevant to the gaming technology sector.

These evolving consultation activities will be documented and reported in future Statements.

8. Monitoring Regulatory Developments

8.1 Monitoring Australian Modern Slavery Guidance

KAP recognises that modern slavery compliance is an evolving process. As part of our commitment to continuous improvement, KAP will be establishing the following monitoring practices during the next reporting period:

1. KAP will monitor guidance and publications issued by the Australian Government relating to the Act, including materials published by the Attorney-General's Department and information published through the Modern Slavery Statements Register.
2. KAP will monitor communications from the Department of Home Affairs and the Commonwealth Modern Slavery Register for any changes to reporting requirements or thresholds. KAP will track relevant developments through membership of, and engagement with, industry bodies and associations active in the gaming technology and manufacturing sectors, which increasingly publish sector-specific modern slavery guidance.
3. KAP will monitor decisions and published statements from the Australian Human Rights Commission, parliamentary inquiries relevant to modern slavery and supply chain transparency, and reports from non-government organisations such as the Business & Human Rights Resource Centre and Walk Free. Where material regulatory updates occur – such as proposed amendments to reporting thresholds, changes to mandatory criteria, or new enforcement guidance – KAP will monitor these updates.
4. Any changes to the regulatory framework relating to modern slavery compliance under the Act will be considered by KAP's cross-functional working group and reported to the Board. Any changes will be reflected in future Statements.

8.2 Monitoring International Compliance Obligations

Given the global nature of our operation and supply chain, KAP recognises that modern slavery compliance obligations are not limited to Australia. A number of international frameworks are directly relevant to our operations and will be monitored as part of our broader compliance program.

As part of its broader compliance framework, KAP intends to:

1. Monitor significant international legislative and policy developments relevant to modern slavery risk management and responsible supply chain practices, including developments in key markets connected to KAP's supply chain and customer base. Particular attention will be given to developments affecting the electronics manufacturing sector, cross-border supply chains and expectations regarding supplier due diligence, supply chain transparency and responsible sourcing; and
2. Monitor international guidance and frameworks relevant to human rights due diligence and responsible business conduct to assist in understanding evolving stakeholder expectations and emerging best practice. This will include legal and regulatory frameworks in the United States, the UK, Europe and Japan.

Where a relevant regulatory development is identified – whether in Australia or internationally – KAP will assess its implications for our supply chain practices and update our approach accordingly.

9. Our Commitments for the Year Ahead

KAP is committed to continuous improvement in our approach to modern slavery. In the next reporting period, we will focus on implementing the foundational measures developed during this reporting period.

During the next reporting period, KAP intends to:

- Complete supply chain mapping for Tier 1 suppliers and commence Tier 2 mapping for high-risk categories by March 2027.
- Finalise and implement our Modern Slavery Policy and Supplier Code of Conduct by March 2027– each of the Policy and the Code will be provided to all current and future employees, directors, contractors, suppliers and other personnel involved in the conduct of our business.
- Issue and collect supplier questionnaires from all key suppliers to support the assessment of modern slavery risks within our supply chain, with questionnaires issued by March 2027.
- Deliver modern slavery awareness training for all employees, with targeted training for those involved in procurement, supply chain, and senior management, with initial training to be completed by March 2027.
- Review and consider independent third-party businesses that provide compliance software services related to supplier due diligence. If this proceeds, it is likely to be implemented by the end of the March 2027 – April 2028 reporting period.
- Review and update existing internal reporting pathways, including grievance and whistleblower channels to ensure accessibility for supply chain workers, by March 2027.
- Establish measurable baseline KPI and metric indicators to begin tracking and assessing effectiveness of KAP's modern slavery framework, as well as processes and procedures, to monitor the effectiveness of the framework in practice.
- Review and update this statement annually to reflect progress made and any changes to our operations or supply chains.

We recognise that addressing modern slavery risks is an ongoing process and we are committed to taking meaningful steps each year to strengthen our practices.

10. Approval

After due consideration of KAP's modern slavery risks and mitigation actions, this modern slavery statement was approved by the board of Directors of Konami Australia Pty Ltd in their capacity as principal governing body on 29 September 2026.

The directors consider this Statement to be a true and fair account of KAP's modern slavery risks and mitigation actions.

This Statement is signed by Gerard Crosby in his role as a Director and Company Secretary of Konami Australia Pty Ltd, a responsible member of its board, being the principal governing body of Konami Australia Pty Ltd.

GERARD CROSBY
Director and Company Secretary of Konami Australia Pty Ltd

Date: 29 September 2026

Annexure – Mandatory Criteria – Page Reference Index

Please see below the sections of this Statement that addresses each of the mandatory criteria in section 16 of the Act:

#	Mandatory Criterion	Section
a)	Identify the reporting entity.	Section 2
b)	Describe the reporting entity's structure, operations and supply chains.	Sections 2–3
c)	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Section 4
d)	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Section 5
e)	Describe how the reporting entity assesses the effectiveness of these actions.	Section 6
f)	Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	KAP does not own or control any other entities.
g)	Any other information that the reporting entity, or the entity giving the statement, considers relevant.	Sections 7–9