



## **Sony Group Statement on UK Modern Slavery Act**

We make this Statement pursuant to Section 54 of the United Kingdom (UK) **Modern Slavery Act 2015** (“Act”) to identify actions we have taken on a Sony Group-wide and global basis during the financial year ending March 31, 2024 to prevent slavery and human trafficking from occurring in our business operations and supply chains. This Statement covers all Sony companies operating in the United Kingdom required by the Act to publish a statement, including but not limited to, Sony Europe B.V., Sony Interactive Entertainment Europe Ltd., Sony Music Entertainment UK Ltd., Columbia Pictures Corporation Limited, Sony DADC UK Limited and other subsidiaries of Sony Group Corporation (sometimes collectively referred to as “**Sony reporting entities**,” “**we**,” “**our**,” or “**us**”). The list of Sony reporting entities covered by this Statement as of March 31, 2024 is available in the Annex.

This Statement discusses actions we have taken at a global level as all Sony companies are required to comply with applicable Sony policies.

### **Our Human Rights Commitment**

Slavery and human trafficking can occur in many forms, such as forced labor, child labor, 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 labor, and human trafficking.

Sony is committed to maintaining and improving systems and processes to help identify and address risks of human rights violations related to our business operations and supply chains throughout the world. At a global level, we invest significant resources and collaborate with stakeholders, suppliers, and industry associations to develop and implement programs designed to prevent slavery and human trafficking in our business operations and supply chains. We use a risk-based approach that prioritizes areas of highest risk as more fully described in Section 2 of this Statement.

***Sony Group Code of Conduct.*** Our commitment to human rights is embedded in the Sony Group Code of Conduct (“**Code of Conduct**”). The Code of Conduct applies to all Sony directors, officers, and employees. The Code of Conduct has been communicated to all Sony personnel, is available at <https://www.sony.net/code/>, and has been translated into 22 languages.

The Code of Conduct reflects ethical principles set out in various global guidelines including the following:

- Organization for Economic Co-operation and Development (**OECD**) Guidelines for Multinational Enterprises (the “**OECD Guidelines**”)
- The United Nations Global Compact
- The United Nations Universal Declaration of Human Rights (the “**UDHR**”)
- The Guiding Principles on Business and Human Rights (the “**Guiding Principles**”)
- Sustainable Development Goals (the **SDGs**)

The Code of Conduct prohibits any form of forced, involuntary or child labor in our operations. It requires all Sony companies to adopt sound labor and employment practices and treat their employees in accordance with applicable laws. Each Sony company must take appropriate steps to assure compliance with the Code of Conduct, including establishing appropriate disciplinary procedures for violations, which may include termination of employment.

All Sony suppliers and contractors are expected to adhere to Sony’s ethical values and comply with Sony policies concerning compliance with laws, respect for human rights, and fair labor and employment practices.

**Human Rights Policy.** Sony’s commitment to upholding fundamental human rights principles such as the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work (the “**ILO Declaration**”) and to respecting internationally recognized human rights of people potentially affected by Sony’s business operations throughout Sony’s value chain is embedded in the Sony Group Human Rights Policy, effective as of March 29, 2024, available at

[https://www.sony.com/en/SonyInfo/csr\\_report/humanrights/humanrightspolicy\\_en.pdf](https://www.sony.com/en/SonyInfo/csr_report/humanrights/humanrightspolicy_en.pdf).

The Human Rights Policy applies to all Sony companies and also provides an overview of our actions related to human rights-related due diligence, remedies, employee trainings, and other stakeholder engagement.

## 1. Description of Our Operations and Supply Chains

**Our Operations.** Sony is engaged in the development, design, manufacture, and sale of various kinds of electronic equipment, instruments and components for consumer, professional and industrial markets such as game hardware, televisions, audio and video recorders and players, still and video cameras, mobile phones, and image sensors (collectively, our “**electronics products**”). There are 12 Sony-operated manufacturing sites for our electronics products located across Japan, China, South Korea, Thailand, Malaysia, and the UK. Sony also contracts with third parties to manufacture certain electronics products on our behalf.

In addition to electronics products, Sony is engaged in the development, sales, production,

distribution and licensing of game software, content and network services. Sony is also engaged in the development, production, manufacture, and distribution of recorded music and the management and licensing of the words and music of songs as well as the production and distribution of animation titles, including game applications based on animation titles. Sony is also engaged in the production, acquisition and distribution of motion pictures and television programming and the operation of television and digital networks. Each of the Reporting Entities engages in certain of the activities described above. The activities of the Reporting Entities are further described in the Annex to this Report.

**Supply Chains.** Sony has global supply chains for certain lines of business. As described in Section 2 below, we determined that our highest risk supply chain is our electronics products supply chain. Sony procures materials and component parts for Sony’s electronics products from suppliers located throughout the world including Japan, Asia-Pacific, Europe, and other areas.

See Responsible Supply Chain Section in our Sustainability Report 2024 for more details about our supply chains. This report is available at:

[https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

## **2. Risks of Slavery and Human Trafficking in our Operations and our Supply Chains**

Sony has worked with Business for Social Responsibility (“**BSR**”) since 2012 to conduct group-wide human rights impact assessments to evaluate risks of slavery and human trafficking in our diverse businesses and supply chains. BSR is an independent, non-profit, global organization devoted to building a just and sustainable world.

Using information from the BSR risk assessments, our processes and controls, and from NGO reports, we determined that Sony’s electronics products manufacturing business and its supply chain has a higher risk for potential human rights abuses than other Sony’s business segments or their supply chains.

Sony’s risks of slavery and human trafficking in our own business operations, including our electronics products manufacturing business, have been mitigated by robust employment policies, training, and other controls.

We utilize a risk-based approach and prioritize our group-wide efforts to mitigate our areas of highest risk which is our electronics products manufacturing business and supply chain. These efforts are described in more detail in this Statement.

### 3. **Actions taken to assess and address slavery and human trafficking risks for electronics products manufacturing including due diligence and remediation processes**

#### (i) *Identifying and assessing actual and potential human rights impacts*

##### *(a) Sony-Owned Manufacturing Sites*

Sony-owned manufacturing sites are operated by Sony employees, service suppliers and on-site contractors. These sites are required to comply with the standards of the Code of Conduct and the Sony Supply Chain Code of Conduct (“**Supply Chain Code**”). Sony internal procedures require implementation of an improvement plan in the event of any areas of non-compliance. Assessments and audits to confirm compliance with these standards are an integral part of our processes.

**Self-assessments.** All Sony-owned electronics products manufacturing sites conduct an annual self-assessment utilizing the Responsible Business Alliance (“**RBA**”) Self-Assessment Questionnaire (“**RBA Questionnaire**”) to monitor adherence to the Code of Conduct and the Supply Chain Code. The RBA Questionnaire was completed by all Sony manufacturing sites for fiscal year 2023. The RBA Questionnaire results were reviewed and analyzed internally. All Sony-owned manufacturing sites were deemed to be low risk.

**Audits.** Selected Sony-owned manufacturing sites also regularly conduct the RBA Validated Assessment Program (VAP) or equivalent audits.

##### ***Enhanced Assessments to Determine Labor Conditions for Foreign Workers in Japan.***

In light of recent reports that foreign and immigrant workers are at risk of forced labor conditions throughout the world, including in Japan. Sony also assesses all Sony manufacturing sites located in Japan to determine if the site directly or indirectly employs foreign or immigrant workers. If they do, Sony conducts a survey to determine the actual terms of employment and working conditions for these workers. Since 2020, Sony has also conducted document assessments of on-site subcontractors at a number of manufacturing sites to verify their hiring processes for technical intern trainees in Japan and the countries in which they were hired, as well as the labor conditions of trainees. The results of these surveys and additional document assessments for technical intern trainees show that manufacturing sites in Japan are taking required steps to ensure compliance with the labor standards set out in the Supply Chain Code.

##### *(b) Within Our Supply Chain*

All new and existing electronics products production suppliers are required to comply with

the Supply Chain Code which is described in Section (ii) (a) below. As explained below, assessments and audits to ensure compliance with the Supply Chain Code are an integral part of our supply chain management.

***New Suppliers:*** Sony conducts an initial assessment of all new OEM/ODM suppliers, all new raw materials/parts suppliers, and their manufacturing facilities to determine the suppliers' risk level. Risk level is based on such factors as the country and region in which they are located, size of business, industry, and type of business.

Higher risk suppliers are subject to additional more comprehensive assessments utilizing the RBA Questionnaire or a more focused questionnaire developed by Sony ("Sony Questionnaire"). These questionnaires evaluate compliance with the Supply Chain Code, including issues related to forced labor among foreign, migrant and immigrant workers, which has become a serious issue worldwide. Completed questionnaires are analyzed to identify potential risks.

***Existing Suppliers:*** All existing OEM/ODM suppliers that do a sizable business with Sony are subject to annual assessments using the RBA questionnaire. If the assessment indicates a high risk, that OEM or ODM supplier is subject to an on-site audit, which may be conducted by an independent third-party auditor.

Sony has also strengthened its activities for existing raw materials/parts suppliers over time. Existing raw materials/parts suppliers, and their manufacturing facilities are regularly categorized by risk level, based on such factors as the country and region in which they are located, size of business, industry, and type of business to determine if they fit criteria for assessment. Higher risk raw materials/parts suppliers must complete an assessment using the RBA Questionnaire or the Sony Questionnaire. Their responses are analyzed to identify any potential risks. If Sony does not deal directly with the manufacturing facility, the assessments are conducted through the trading company or manufacturer that is the primary supplier.

If a supplier is suspected of violating the Supply Chain Code, a remote or on-site assessment is conducted, and employees and managers are interviewed to verify the suspected violation. If the suspected violation is confirmed, we issue guidance as to how to remedy the violation. We then continue to monitor and evaluate the situation to ensure the violation has been remedied as instructed. Sony's policy is to review its business relationship with a supplier if a serious violation of the Supply Chain Code (such as forced labor, child labor, inhumane working conditions, unlawful discrimination, lack of an emergency and disaster action plan, presence of risks that cause a serious life-threatening accident to a worker, significant environmental pollution issues) were to occur or if a supplier fails to cooperate fully in an investigation or audit.

For higher risk suppliers, we use a third-party auditing company to confirm compliance with the Supply Chain Code. Employee interviews are also included as part of this audit. Employees are required to directly verify whether they are responsible for employment fees, the site's health and safety conditions, and other relevant issues. The audits also include verification of relevant documents related to employment contracts, working hour data, policies and procedures and local health and safety conditions.

**Assessment Results and Remediation:** In fiscal year 2023, we conducted a total of 235 document-based assessments for new and existing supplier plants. We also conducted remote/on-site assessments and interviews at 12 plants. The results of these assessments are as follows:

- **New Supplier Plants.** The document-based assessments identified 5 plants with minor concerns such as excessive working hours. Sony issued instructions to these suppliers and is monitoring their remedial actions. We also conducted remote or on-site assessments at 8 supplier plants suspected to be in violation, pointing out issues and issuing instructions for improvement. In either case, suppliers are asked to plan for improvement, manage progress and show evidence-based results.
- **Existing Supplier Plants.** The 179 document-based assessments identified plants with minor concerns such as excessive working hours. Sony issued instructions to these suppliers and is monitoring their remedial actions. We also conducted remote or on-site assessments at 4 supplier plants suspected to be in violation, pointing out issues and issuing instructions for improvement. In either case, suppliers are asked to plan for improvement, manage progress and show evidence-based results.
- There was no definitive evidence of forced labor identified at any of the suppliers assessed in 2023. However, we did identify areas of noncompliance with the Supply Chain Code, such as employees working more than 60 hours per week. Sony contacted the relevant suppliers and required them to develop a corrective action plan for each violation and to submit the plan to Sony.

See also page 79 in our Sustainability Report 2024 available at:

[https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

**(c) Incorporating Findings from the Media and NGO Report.** If an NGO report or other media report indicates possible violations of the Supply Chain Code, Sony works with the identified supplier and may request a third-party RBA audit of the supplier's manufacturing site to confirm the accuracy of the report and necessary corrective action.

*(ii) Integrating our findings across the group and taking appropriate action to address impacts*

*(a) Supplier Compliance Procedures and Adherence to Our Values*

**Supply Chain Codes.** Sony is committed to working with its suppliers and other stakeholders to better understand potential areas of risk and increase transparency. Sony also seeks to use its influence to help mitigate any negative impacts identified.

Sony is a founding member of the RBA, a non-profit coalition comprising electronics, retail, automotive and toy companies committed to supporting the rights and well-being of workers and communities affected by the global supply chain. Sony has adopted the Supply Chain Code for Sony's electronics products suppliers. The Supply Chain Code, which incorporates the RBA Code of Conduct, establishes standards designed to, among other things, ensure that human rights of workers are upheld and that workers are treated with respect and dignity by suppliers. In particular, the Supply Chain Code prohibits the use of forced, bonded or indentured labor, involuntary prison labor, slavery and human trafficking. The provisions of the Supply Chain Code are derived from internationally recognized standards including the OECD Guidelines, Guiding Principles, ILO Declaration, ILO Fundamental Conventions, and UDHR.

The Supply Chain Code is available at:

[https://www.sony.com/en/SonyInfo/csr\\_report/sourcing/Sony\\_Supply\\_Chain\\_CoC\\_E.pdf](https://www.sony.com/en/SonyInfo/csr_report/sourcing/Sony_Supply_Chain_CoC_E.pdf).

Although we have assessed the risk of slavery and human trafficking in our recorded music, motion pictures and television businesses as low, Sony is committed to enhancing Sony Group's responsible supply chain activities in the entertainment industry and has been working to strengthen its supplier program standards for human rights, ethical business practices, safety and environment in our recorded music, motion pictures and television businesses.

Sony Pictures Entertainment established the Code of Conduct for Suppliers to Sony Pictures Entertainment Inc. and Sony Music Entertainment established its Supplier Code of Conduct. Additionally, Sony Interactive Entertainment recently established its Business Principles and is working to raise the standards of all the business partners it works with. These documents are based on principles similar to those of the Supply Chain Code.

The Code of Conduct for Suppliers to Sony Pictures Entertainment Inc. is available at:

<https://supplier.sonypictures.com/codeofconduct.php>.

The Sony Music Supplier Code of Conduct is available at:

<https://supplier.sonymusic.com/>.

The Sony Interactive Business Principles is available at:

<https://sonyinteractive.com/en/impact/responsible-supply-chain/>.

***Responsible Sourcing of Minerals:*** As part of its commitment to avoid contributing to environmental concerns, conflicts, or human rights abuses through its sourcing practices, Sony identified certain minerals sourced from high-risk areas (“High-Risk Minerals”) that are essential to the manufacture of electronics products. In addition to the Supply Chain Code, Sony established the Sony Group Policy for Responsible Supply Chain of Minerals. In this Policy, Sony pledges to avoid contributing to conflicts or serious human rights abuses through its sourcing practices, and pledges to refrain from knowingly purchasing any products, components or materials that contain High-Risk Minerals that contribute to conflicts or serious human rights abuses. Sony is also working with its suppliers to address issues related to human rights, labor conditions, health and safety, and environmental protection at High-Risk Mineral production sites and in its procurement of these High-Risk Minerals.

See more details in page 82 in our Sustainability Report 2024 available at:

[https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

***Contract Terms for Electronics Products Suppliers:*** Compliance with the Supply Chain Code is included in contracts signed when Sony begins doing business with electronics products raw materials/parts suppliers. All electronics products raw materials/parts suppliers are provided with the Supply Chain Code upon signing a new contract and are kept informed of changes through updated documents. Further, Sony regularly reminds suppliers of their responsibilities and obtains a declaration of compliance from them.

When starting new business dealings with suppliers, Sony requests compliance with the Supply Chain Code not only from the primary supplier, but also from plants supplying materials and parts to Sony through the primary supplier. Furthermore, if a primary supplier is a trading company, Sony acquires a compliance consent from the parts manufacturer and manufacturing sites through the trading company and confirms that compliance is implemented.

Sony also distributes the Supply Chain Code to our own supply chain, requesting compliance by indirect suppliers through our direct suppliers.

***(b) Internal Leadership***

Sony’s Sustainability Department at its headquarters takes the lead in promoting efforts toward a responsible supply chain in cooperation with procurement and other relevant



functions at the corporate head office and within the various business units.

The Sustainability Department is led by the Senior Executive in charge of Sustainability. The Sustainability Department also assesses external trends and communicates with stakeholders, drawing on both to formulate basic company-wide supply chain management policy.

The Senior Executive in charge of Sustainability appoints management in each relevant business unit responsible for overall operational compliance within the business unit, including compliance with the Supply Chain Code, risk assessments, regular monitoring and remedial measures.

The Sustainability Department provides an annual report to the Sony Group Corporation's Board of Directors on all key aspects of Sony's sustainability initiatives including addressing and mitigating the risks of forced labor. The Sustainability Department also provides the Board with quarterly updates on relevant topics. Senior executives and department heads may also provide regular reports to the Board for review, as necessary.

***(iii) Tracking our performance by checking the impact we are making***

Sony issues improvement instructions to any supplier that it suspects of being in violation of the Supply Chain Code and then verifies whether those improvement instructions have been completed as requested. If deficiencies are discovered through third-party audits of a supplier's manufacturing site, Sony requires the supplier to develop an improvement plan and monitors the supplier's performance by conducting follow-up audits.

***(iv) Publicly communicating what we are doing***

Sony publicizes its work to address human rights impacts through its Responsible Supply Chain section in our Sustainability Report 2024 at:

[https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

***(v) Remediation***

***Grievance Mechanism.*** Sony employees are encouraged to raise any concerns and have multiple channels to do so, including the Sony Ethics & Compliance Hotline which is available in different local languages and staffed by independent third-party operators. Sony protects reporters from retaliation. The Sony Ethics & Compliance Hotline is also available to suppliers to report concerns regarding possible violations of the law or Sony policies.

Sony also operates the Grievance System for Sony Group Electronics Supply Chain for relevant stakeholders in the electronics supply chain, including manufacturers and suppliers

of parts, raw materials, manufacturing equipment, etc., their employees, and other related parties to report violations or possible violations of the Supply Chain Code and the Sony Group Policy for Responsible Supply Chain of Minerals. Submitted grievances are received and investigated by an organization that is not directly involved in the matter.

Sony investigates allegations expeditiously and objectively. If a violation by a supplier is confirmed, Sony requires the supplier to take corrective action. If a supplier refuses to cooperate with the investigation or fails to take requested corrective action, Sony will reconsider the business relationship. If the violation involves an indirect supplier, the relevant Sony affiliate will work with its direct supplier to obtain corrective action from such indirect supplier.

In addition, examples of remedial guidance for violations identified during on-site audits can be found in page 79 in our Sustainability Report 2024 available at:

[https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

#### **(vi) Training**

All Sony employees are required to receive initial and periodic refresher training on the Code of Conduct to help ensure that they understand Sony's commitment to its core ethical values and internal policies.

In fiscal year 2023, all General Managers and above in our electronics manufacturing operations procurement department received additional training on human rights in the supply chain and Sony's initiatives for sustainability. We also conducted training for all personnel in our procurement department to enable them to better understand Sony Group initiatives aimed at achieving a responsible supply chain. In addition, all personnel who are the contact point for raw materials/parts suppliers received training on the human rights violation risks identified in our supplier assessment and our improvement processes as well as the necessary measures to take in the event that risks materialize.

In fiscal year 2023, we distributed a video to larger raw materials/parts suppliers to deepen their understanding of our policy of sustainable procurement. The video explains Sony's approach to sustainability, our Supply Chain Code of Conduct, and our Responsible Minerals Sourcing Policy. In this video we also request our suppliers' cooperation to help us achieve our goal of sustainable procurement by complying with our requirements.

#### **4. How Sony assesses the effectiveness of its actions to assess and address modern slavery risks**

Sony conducts assessments and audits of its electronics suppliers as described above. Sony tracks overall supplier performance with the Supply Chain Code by comparing the year over year results of the number of assessments using questionnaires, improvements requested, and remote/on-site visits.

The Sustainability Department also assesses external trends and communicates with stakeholders to help gauge the effectiveness of actions taken.

## 5. Approval of Statement

Pursuant to the delegation of authority approved by the Sony Group Corporation's Board of Directors, this Statement has been approved by Shiro Kambe, Senior Executive Vice President and Corporate Executive Officer in charge of Legal, Compliance and Sustainability.



Shiro Kambe  
Senior Executive Vice President  
Corporate Executive Officer  
Officer in charge of Legal, Compliance and Sustainability  
September 2024

## Annex

- AWAL Digital Limited
- AWAL Recordings Limited
- Bad Wolf (TWK)LTD
- BB Limited
- Black Butter Limited
- Bleeding Fingers Inc.
- Broccoli Content Limited
- Ceremony of Roses UK Limited
- Century Media Records Limited
- Columbia Pictures Corporation Limited
- Crunchyroll, LLC
- Essential Music & Marketing Limited (t/a The Orchard)
- Extreme Music Library Limited
- FIRESPRITE LIMITED
- Hawk-Eye Innovations Limited
- K.P.M. Music Limited
- LBPTV2 Limited
- LBP Outlander 6 and 7 Limited
- Left Bank Pictures (Television) Limited
- Ministry Of Sound Recordings Limited
- MSM Asia Limited
- Now That's What I Call Music LLP
- Pulse Innovations Limited
- Raymond Gubbay Limited
- Robots and Humans Music Ltd
- Royal Share Limited
- Senbla Limited
- SMEIL Digital Limited
- Somethin Else Group Limited
- Sony Music Publishing (UK) Limited
- Sony DADC UK Limited
- Sony Europe B.V.
- SONY INTERACTIVE ENTERTAINMENT DIRECT EUROPE LIMITED
- Sony Interactive Entertainment Europe Ltd.
- Sony Interactive Entertainment Network Europe Limited
- Sony Interactive Entertainment UK Limited
- Sony Mobile Communications AB
- Sony Music Entertainment UK Ltd.
- Sony Music Entertainment Ireland Limited
- Sony Music Entertainment International Limited
- The Orchard, EU Limited
- Uploader Limited
- Whisper Films Limited
- Whoniverse 1 Limited
- Whoniverse 2 Limited