



Sony Group Statement on U.K. Modern Slavery Act

We make this Statement pursuant to Section 54 of the United Kingdom (UK) **Modern Slavery Act 2015** (the “**Act**”) to identify actions we have taken on a Sony Group-wide and global basis during the financial year ending March 31, 2020 to prevent slavery and human trafficking from occurring in our business operations and supply chains. Not all Sony Group¹ companies (“**Sony**”) are subject to the Act. However, all Sony companies throughout the world are required to comply with applicable Sony policies, so we discuss the actions we have taken group-wide at a global level in this Statement. This Statement covers all Sony companies operating in the United Kingdom who are 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 Europe Limited and other subsidiaries of Sony Corporation (collectively referred to as “**Sony reporting entities**”, “**we**” or “**us**”). The list of Sony reporting entities covered by this Statement as of March 31, 2020 is available in the Annex.

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 have invested significant resources and have collaborated 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, particularly in our electronics manufacturing supply chain, which, as noted below, is an area at higher risk of slavery and human trafficking.

Sony Group Code of Conduct. Our commitment to human rights is set out in the Sony Group Code of Conduct, which is applicable to all Sony directors, officers, employees and relevant third-party staff (the “**Code of Conduct**”). The Code of Conduct is available at <https://www.sony.net/code/>. It has been translated into 23 languages and has been communicated to all Sony personnel.

¹ For this purpose, a Sony Group company is any company where 50% or more of the voting rights are directly or indirectly controlled by Sony Corporation.

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

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

The Code of Conduct prohibits any form of forced, involuntary or child labor in our operations, requires all Sony companies to adopt sound labor and employment practices and requires all Sony companies to 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 of the Code of Conduct which may include termination of employment.

In addition, in accordance with the Code of Conduct, 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.

1. Our Operations and Supply Chains

Operations. Sony is engaged in the development, design, manufacture and sale of various kinds of electronic equipment, instruments and devices for consumer, professional and industrial markets such as network services, game hardware and software, televisions, audio and video recorders and players, still and video cameras, mobile phones, and image sensors (collectively, our "electronics" products). There are 14 Sony-operated manufacturing sites for our electronics products located in Japan, China, South Korea, Thailand, Malaysia, UK and Brazil. Sony also contracts with third parties to manufacture certain electronics products on our behalf.

In addition to electronics, Sony is 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. Further, Sony is also engaged in various financial services businesses, including life and non-life insurance operations through its Japanese insurance subsidiaries and banking operations through a Japanese internet-based banking subsidiary.

Supply Chains. Sony procures materials and component parts for Sony’s electronics products from suppliers located throughout the world including China, Japan, Asia-Pacific (India, South Korea, Oceania), Europe (UK, France, Germany, Russia, Spain, Sweden), the US and other areas (Middle East, Brazil, Mexico and Canada.)

*See https://www.sony.net/SonyInfo/csr_report/sourcing/ and our Sustainability Report 2020, page 77 for more details, available at https://www.sony.net/SonyInfo/csr_report/.

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

Sony employs rigorous hiring procedures and has implemented robust employment policies and other controls to mitigate the risk of slavery and human trafficking in our own business operations.

We engaged BSR, an independent, non-profit, global organization devoted to building a just and sustainable world, to reevaluate risks of slavery and human trafficking in our business operations and related supply chains. From that assessment, and from our processes and controls, we understand that our electronics manufacturing supply chain is at higher risk for potential human rights abuses than any other Sony company business operations or the supply chains of our non-electronics business segments. We therefore prioritized our electronics manufacturing supply chains in our group-wide efforts.

3. Actions taken to assess and address slavery and human trafficking risks, including due diligence and remediation processes

i. Identifying and assessing actual and potential human rights impacts.

Self-assessments. Assessments and audits are an integral part of our overall supply chain management process. Each year, all Sony-owned electronics manufacturing sites conduct a self-assessment utilizing the Responsible Business Alliance (RBA) Self-Assessment Questionnaire ("**RBA Questionnaire**") to monitor adherence to the Code of Conduct and the Sony Supply Chain Code of Conduct (the "**Supply Chain Code**", discussed in 3.ii (a) below). The RBA Questionnaire completed by all Sony manufacturing sites for 2019 did not identify any areas of major non-conformance to Sony’s standards. Pursuant to Sony’s internal procedures, if any non-conformance had been identified, our affiliates would have been required to put an improvement plan in place to ensure conformance to the standards set by these Codes.

Assessment of Labor Conditions for Foreign Workers Employed at Manufacturing Sites. In response to increasing concerns over labor conditions of migrant workers, Sony affiliates

operating in Japan began conducting risk assessments in 2017 to determine which manufacturing sites have the highest risk of directly or indirectly engaging foreign workers. These assessments identified several manufacturing sites in Japan where our on-site business partners employ foreign workers. Sony asked these on-site business partners to survey their foreign workers to ensure that appropriate hiring processes were used to engage such foreign workers at these sites. In 2019, a number of manufacturing sites also conducted in-person interviews of their on-site subcontractors to verify that the hiring processes for technical intern trainees complied with applicable laws both in Japan and the countries in which they were hired, and that the labor conditions of such trainees complied with applicable fair labor and employment laws.

Supply Chain Assessments and Audits. Since 2008, Sony has also conducted assessments of all direct electronics suppliers utilizing the RBA Questionnaire and risk assessment tool to help Sony identify suppliers in its electronics manufacturing supply chain who may pose a risk of slavery and human trafficking and to determine if Sony needs to take further actions with any of these suppliers. In 2019, Sony completed assessments for 162 suppliers and identified 8 suppliers for on-site inspections. Sony completed its assessment of all 8 suppliers' facilities in 2019.

Media and NGO reports. Sony also reviews media and NGO reports to help determine Sony's highest-risk suppliers. In cases where any possibility of violations of the Sony Supply Chain Code is reported via external sources such as NGOs or media reports, Sony cooperates with the supplier in question to confirm the facts of the case expeditiously and objectively. Specifically, Sony may request that the supplier's manufacturing site undergo a third-party RBA audit.

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 Code. Sony is committed to working with its suppliers and other stakeholders to better understand potential areas of risk and increase transparency. Sony seeks to use its influence to help mitigate any negative impacts identified. Sony is a founding member of the Responsible Business Alliance (the "RBA", formerly known as Electronic Industry Citizenship Coalition), 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 electronics supply chain and has adopted the Sony Supply Chain Code of Conduct (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 forced, bonded or indentured labor, involuntary prison labor, slavery and human trafficking. The Supply Chain Code is available at https://www.sony.net/SonyInfo/csr_report/sourcing/.

The Supply Chain Code is aligned with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the UN Declaration of Human Rights.

Contract Terms. Compliance with the Supply Chain Code is included in contracts signed when Sony begins doing business with a supplier. Suppliers are kept informed of changes to the Supply Chain Code and receive updated documents. To further ensure that suppliers are taking action to comply with the Supply Chain Code, Sony regularly reminds suppliers of their responsibilities and obtains a written confirmation of compliance from suppliers.

In 2018, as part of Sony's continued efforts to strengthen its supply chain management and prevent use of forced labor in our supply chains, Sony sent a written reminder to its suppliers stressing the importance of compliance with the Supply Chain Code. Sony's communication included the latest information on applicable human rights related laws and regulations, common industry findings related to forced labor and the latest self-assessment tools. In 2019, Sony reminded all suppliers bound by the Supply Chain Code of their obligations under this Code. These obligations include allowing workers to choose employment freely, receive humane treatment, and not face discrimination. Sony also requested these suppliers to enhance their own supply chain management to prevent forced labor by Sony's indirect suppliers.

(b) Ongoing Monitoring and Assessment of Electronics Manufacturing Operations and Supply Chain

Internal Leadership. Sony's corporate social responsibility ("CSR"), procurement and production groups at the head office take the lead in promoting Sony's responsible sourcing practices, including practices designed to prevent slavery and human trafficking. Our head office's CSR group communicates with external stakeholders to monitor trends and best practices while our procurement and production groups are responsible for overall policy implementation for Sony's electronics manufacturing operations.

Assessment of Labor Conditions for Foreign Workers Employed at Manufacturing Sites. Where necessary, Sony asked its business partners to improve compliance with the Supply Chain Code. Sony also continues to monitor labor conditions at these manufacturing sites.

iii. Tracking our performance to check the impact we are making.

To check whether impacts are being addressed, Sony issues improvement instructions to any supplier that it suspects to be in violation of the Supply Chain Code and then verifies that those improvement instructions have been completed as requested. If deficiencies are discovered through third-party RBA 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 what it is doing to address human rights impacts through its Responsible Supply Chain webpage at https://www.sony.net/SonyInfo/csr_report/sourcing/.

v. Remediation.

Grievance Mechanism. Sony employees are encouraged to raise any concerns and have multiple channels to do so, including an ethics hotline that is available in the local language and staffed by independent third-party operators. Sony protects reporters from retaliation. Sony also operates a hotline for external stakeholders to report violations of the Supply Chain Code.

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.

Training. All Sony employees are required to receive initial and periodic refresher training on the Code of Conduct to help ensure that they understand our internal policies. Our procurement staff for our electronics manufacturing operations receives additional training on the Supply Chain Code standards, how to identify risks of slavery and human trafficking, and how to conduct an effective supplier assessment.

During on-site supplier assessments, Sony's staff provide training to the suppliers on the Supply Chain Code and share Sony's experience on how socially responsible practices benefit business operations, citing for example, increased productivity and lower staff turnover.

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

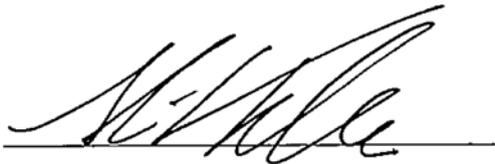
Sony conducts assessments of its electronics suppliers. Sony has tracked overall supplier performance with the Supply Chain Code by comparing year over year results of the annual number of (i) assessments completed, (ii) documents reviewed, (iii) improvements requested, and (iv) on-site visits.

*See https://www.sony.net/SonyInfo/csr_report/sourcing/ and our Sustainability Report 2020, page 77 for more details, available at https://www.sony.net/SonyInfo/csr_report.

Under the supervision of the Senior Executive Vice President in charge of Sustainability, the CSR group at Sony's head office assesses external trends and communicates with stakeholders.

5. Approval of Statement

Pursuant to the delegation of authority approved by the Board of Directors of Sony Corporation, this Statement has been approved by Ichiro Takagi, Senior Executive Vice President in charge of Manufacturing, Logistics, Procurement and Engineering Platform, and Shiro Kambe, Senior Executive Vice President and Corporate Executive Officer in charge of Legal, Compliance and Sustainability.

A handwritten signature in black ink, appearing to read 'S. Kambe', is written over a horizontal line.

Shiro Kambe
Senior Executive Vice President
Corporate Executive Officer in charge of Legal, Compliance and Sustainability
September 2020

Annex

- Black Butter Limited
- Bleeding Fingers Inc.
- Broccoli Content Limited
- Columbia Pictures Corporation Limited
- EMI Production Music
- Essential Music & Marketing Limited (t/a The Orchard)
- Extreme Music Library Limited
- Funimation Global Group, LLC
- Hawk-Eye Innovations Limited
- Kontraband Limited
- Left Bank Pictures Limited
- Ministry Of Sound Recordings Limited
- Now That's What I Call Music LLP
- Promised Land Recordings Limited
- Pulse Innovations Limited
- Raymond Gubbay Limited
- Senbla Limited
- Sony/ATV Music Publishing UK
- Sony DADC Europe Limited
- Sony Europe B.V.
- 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 International Limited
- Sony New Media Solutions UK Limited
- Stackhouse Music Management Limited
- Syco Entertainment Limited
- Three Six Zero Recordings Limited