

**Sony Joint Modern Slavery Statement - *Modern Slavery Act*  
2018 (Cth)**

**Reporting Period: 1 April 2020 – 31 March 2021**

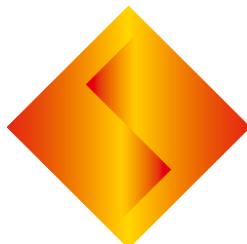
**Reporting Year: Year 2**

**Submission Date: 29 September 2021**

**SONY**



**SONY MUSIC**



**Sony  
Interactive  
Entertainment**

# Sony Joint Modern Slavery Statement - Modern Slavery Act 2018 (Cth)

## Summary: Addressing the Mandatory Criteria of the *Modern Slavery Act 2018 (Cth)*

Section of Act	Obligation	Where the obligation is addressed in the Joint Statement
16(1)(a)	Identify the reporting entities	Pages 2-3
16(1)(b)	Structure, Operations and Supply Chains	Pages 4-8
16(1)(c)	Risks of modern slavery practices in the operations and supply chains of the reporting entities and any entities the reporting entity owns or controls	Pages 8-10
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### Mandatory Criterion 1 – Identify the reporting entities

This joint modern slavery statement (“**Joint Statement**”) meets the requirements for approval and signature set out in section 14 of the Commonwealth *Modern Slavery Act 2018 (Cth)* (the “**Australian Modern Slavery Act**”).

This Joint Statement covers all Sony companies operating and carrying out business in Australia, who are required by the Australian Modern Slavery Act to publish a modern slavery statement (collectively referred to in this Joint Statement as “**Australian Sony reporting entities**”, “**we**” or “**us**”). The list of Australian Sony reporting entities covered by this Joint Statement as of 31 March 2021 is available in the Annex.

This Joint Statement covers the reporting period between 1 April 2020 to 31 March 2021 and addresses each of the mandatory criteria for content set out in section 16 of the Australian Modern Slavery Act.

Although not all Sony Group companies (“**Sony**”) are subject to the Australian Modern Slavery Act, all Sony companies throughout the World (including the Australian Sony reporting entities) are required to comply with applicable global Sony policies and procedures, so we make references to actions taken at a global level in this Joint Statement together with additional steps the Australian Sony reporting entities have taken in the relevant reporting period.

The Australian Sony reporting entities note the supporting guidance provided by the Australian Government set out in the *Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities* (“**Australian Government Guidance**”) together with the supplementary guidance subsequently released by the Australian Government. The Australian Sony reporting entities have used the Australian Government Guidance to help prepare this Joint Statement and to more generally inform and guide the steps we are taking and our approach to compliance with the Australian Modern Slavery Act.

## **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 Joint Statement, we use the terms “slavery” and “human trafficking” or “**modern slavery**” to include all forms of slavery, servitude and forced or compulsory labor, and human trafficking in a manner consistent with the definition of “modern slavery” in the Australian Modern Slavery Act.

Globally, 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.

Since the introduction of the Australian Modern Slavery Act, the Australian Sony reporting entities have also invested significant resources to understand the requirements of the Australian Modern Slavery Act and the expectations of the Australian Government as set out in the Australian Government Guidance, as well as considering further guidance issued by the Australian Government. This body of work includes working closely with “Global HQ” stakeholders in Legal, Compliance and CSR at Sony Group Corporation on an ongoing basis to develop and refine our approach to

addressing this important and complex human rights issue.

Sony's global, prioritised, risk-based approach aligns with the approach taken by the Australian Government, however, the Australian Sony reporting entities have also taken additional steps and measures where required as set out in this Joint Statement.

## **Mandatory Criterion 2 – Our Structure, Operations and Supply Chains**

### *Structure*

All of the Australian Sony reporting entities form part of the Sony group. Sony Group Corporation (Organisation number 134 059 582) (“**Sony Group Corporation**” or “**Global HQ**”), incorporated in Japan, is the ultimate parent company for all of the Australian Sony reporting entities.

- **Sony Australia Limited (ACN 001 215 354)** is an Australian public company, limited by shares. It has approximately 197 employees and its registered office is 165 Walker Street, North Sydney NSW 2060. In terms of its corporate structure, it does not control any other entities and its Dutch holding company (Sony Overseas Holding BV) owns 100% of the issued shares in Sony Australia Limited.
- **Sony Music Entertainment Australia Pty Ltd (ACN 107 133 184)** is an Australian proprietary company, limited by shares. It has approximately 135 employees and its registered office is 11-19 Hargrave St Darlinghurst NSW 2010. In terms of its corporate structure, its immediate parent entity is SBME Holdings (Australia) Pty Limited. It owns and controls some local Australian music businesses.
- **SBME Holdings (Australia) Pty Ltd (ACN 107 132 329)** is an Australian proprietary company, limited by shares. In terms of its corporate structure, its immediate parent entity is Sony Music Entertainment, incorporated in the United States of America and it owns or controls BMG Australia Pty Limited and Sony Music Entertainment Australia Pty Ltd.
- **Sony Interactive Entertainment Australia Pty Limited (ACN 077 583 183)** is an Australian proprietary company, limited by shares. It has approximately 61 employees with registered office at 64 – 76 Kippax Street, Surry Hills NSW 2010. In terms of its corporate structure, its parent company is Sony Interactive Entertainment Europe Ltd; it is a wholly owned subsidiary of Sony Interactive Entertainment Europe Ltd and it does not control any other entities.
- **Sony Interactive Entertainment Network Europe Ltd (Company number 06020283)** is a private company, limited by shares, with a registered office in the UK. In terms of its corporate

structure, its parent company is Sony Interactive Entertainment Europe Ltd; it is a wholly owned subsidiary of Sony Interactive Entertainment Europe Ltd and it does not control any other entities.

### ***Operations.***

To understand the specific operations of the Australian Sony reporting entities, it is useful first to understand how Sony operates at the global level. Globally, 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**”). Globally, there are 12 Sony-operated manufacturing sites for our electronics products, which are located in Japan, China, South Korea, Thailand, Malaysia, and UK. Sony global affiliates also contracts with third parties to manufacture certain electronics products on Sony’s 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.

The Australian Sony reporting entities specifically undertake the following functions, activities and operations:

- **Sony Australia Limited (ACN 001 215 354)**
  - Sony Australia Limited is a local sales and marketing company in Australia for electronics manufactured by Sony. We do not manufacture any electronics. Our core business is divided into consumer products and professional products and solutions. Sony Australia Limited’s key consumer products are televisions, home theatre and solutions, Blu-ray disc and DVD players, headphones and earphones, MP3 players, wireless speakers, cameras, video cameras and memory cards. These products are sold through a range of retail partners across Australia and also directly by Sony Australia Limited through our online store (<https://store.sony.com.au/>) and retail stores located in Castle Hill, Chatswood and Parramatta (Sydney).

- Sony Australia Limited also provides to the Australian market a range of professional products and solutions for the broadcast and production, sports, entertainment, education, corporate and healthcare sectors. Professional products include studio and broadcast cameras, digital cinema cameras, camcorders, professional monitors and projectors, optical disc archiving, and imaging cameras and monitors.
  - Our professional solutions also include integrated solutions for outdoor broadcast vans (OBVs) and sports tracking technologies through our Hawk-Eye business across Australia.
- **Sony Music Entertainment Australia Pty Ltd (ACN 107 133 184)**
    - Sony Music Entertainment Australia Pty Ltd is the Australian affiliate of Sony Music Entertainment.
    - The principal continuing activities of Sony Music Entertainment Australia Pty Ltd are the sale and licensing of pre-recorded music, compact discs, records, DVDs and associated merchandise and the sale of music via digital channels. In addition, the company is involved in sponsorships and endorsements, concert promotion and artist management.
    - The company has played a pioneering role in music history and nurtured some of music’s most iconic artists and produced some of the most influential recordings of all time. The company supports a diverse roster of superstars, developing and independent artists and visionary creators, with a local artist roster consisting of over 70 Australian artists.
    - Sony Music Entertainment Australia Pty Ltd is also involved in the operations of the local Australian music businesses which it either owns or controls.
- **SBME Holdings (Australia) Pty Ltd (ACN 107 132 329)**
    - SBME Holdings (Australia) Pty Ltd is the holding company for Sony Music Entertainment Australia Pty Ltd and does not undertake any operations.
- **Sony Interactive Entertainment Australia Pty Limited (ACN 077 583 183)**
    - Sony Interactive Entertainment Australia Pty Limited is a sales and marketing company and appointed local distributor for electronics manufactured by Sony Interactive Entertainment Europe Limited (and associated subsidiaries). We do not manufacture any products ourselves.
    - Our core business is consumer products, including products marketed under the PlayStation brand.
    - Our key consumer products are gaming consoles, videogames and associated peripherals,

and accessories.

- These products are sold through a range of retail partners throughout Australia.
- **Sony Interactive Entertainment Network Europe Ltd (Company number 06020283)**
  - Sony Interactive Entertainment Network Europe Ltd operates the PlayStation online store and sells digital games from that platform to Australian consumers.

### ***Supply Chains***

The supply chains across the different Australian Sony reporting entities are complex and varied. A high-level summary of our supply chain structure is set out below.

#### ***i. Supply chains in relation to core Sony products***

We acquire our products from our Sony global affiliates who form part of our supply chain for core products such as electronics. Our global affiliates procure 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), and other areas (US, Middle East, Brazil, Mexico and Canada). \*See [https://www.sony.com/en/SonyInfo/csr\\_report/sourcing/](https://www.sony.com/en/SonyInfo/csr_report/sourcing/) and our Sustainability Report 2021 for more details available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

Specifically, Sony Australia Limited imports electronics from Sony Corporation, while Sony Interactive Entertainment Australia Pty Limited acquires electronics in connection with the PlayStation brand (such as gaming consoles and accessories) from Sony Interactive Entertainment Europe Limited. These supply arrangements are long term and secure, given they are intra-group arrangements.

Sony Music Entertainment Australia Pty Limited acquires the rights to audio and audio visual recordings through entering into recording agreements with music recording artists, where Sony Music Entertainment Australia Pty Limited acquires ownership in the recordings, or by entering into licence or distribution agreements with such artists, where the artist retains ownership and Sony Music Entertainment Australia Pty Limited acquires more limited rights for a fixed period. Sony Music Entertainment Australia Pty Limited also obtains the rights to audio and audio visual recordings of international music recording artists through licence arrangements with other companies in the Sony Music Entertainment corporate group outside of Australia. Sony Music Entertainment Australia Pty Limited releases and markets these recordings in Australia via physical formats such as CD and vinyl and via digital formats such as streaming services and downloads.

#### ***ii. Supply chains for other operations***

To support the sale and marketing operations and other activities, the Australian Sony reporting entities' supply chain also includes the following:

- logistics services (end to end transportation of Sony products to end consumers, including warehousing);
- sales and marketing (advertising, promotions, merchandise, public relations, social media, retail displays);
- professional services (legal, accounting and tax advice);
- insurance;
- administrative support (such as outsourced accounts receivable/payable functions);
- information technology (IT infrastructure, IT consulting, IT goods and services procurement); and
- facilities management (services for cleaning, repairs and maintenance and day to day business operations).

Generally speaking our suppliers for the above are based locally in Australia. However:

- some back-end support services, such as IT services, are provided by our global affiliates; and
- a small number of our suppliers are located outside Australia, for example, some of Sony Music Entertainment Australia Pty Limited's merchandise manufacturers are located off-shore (including China), Sony Australia Limited's call center operator is located in the Philippines and Sony Interactive Entertainment Australia Pty Limited engages suppliers located in the United Kingdom and the Philippines.

**Mandatory Criterion 3 – Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities and any entities the reporting entity owns or controls**

Globally, using a risk-based approach, Sony has prioritised its group wide efforts to mitigate human rights risks in our electronics manufacturing supply chains.

In our last reporting period:

***Globally***

Sony engaged Business for Social Responsibility (“BSR”), an independent, non-profit, global organisation devoted to building a just and sustainable world, to evaluate risks of slavery and human trafficking in our business operations and related supply chains. From that risk assessment, and from information derived from our processes and controls, we understand that our electronics manufacturing supply chain is at higher risk for potential human rights abuses than Sony company

business operations, or the supply chains of our non-electronics business segments.

***Locally***

Sony Australia Limited completed a preliminary scoping exercise to identify key areas of potential modern slavery risk in relation to its specific operations and supply chain. The following key potential risks in Sony Australia Limited’s operations and supply chain were identified:

<p><b>Sector and industry risks</b></p>	<p>Consistent with Sony’s global approach we identified electronics as being a higher risk sector and industry. We also identified fashion in relation to our merchandise and cleaning in relation to our offices as sectors known to have a higher risk of modern slavery as outlined in the Australian Government Guidance.</p>
<p><b>Product and services risks</b></p>	<p>Again, we identified electronic products, which have been identified by the Global Slavery Index 2018 as the products at the highest risk of modern slavery. We recognise that cotton used in merchandise represents a potentially high risk. Additionally, services such as cleaning are recognised as potential high-risk services.</p>
<p><b>Geographic risks</b></p>	<p>We recognise that some countries may have potentially higher risks of modern slavery. The Global Slavery Index 2018 indicates that electronics and fashion in particular sourced from certain Asian countries present higher risks of being implicated in modern slavery.</p>

Having identified the above key potential risks in supply chains and operations, Sony Australia Limited identified for the purpose of key initiatives in the current reporting period: (1) key suppliers who would receive supplier surveys as part of Year 2 initiatives, and (2) which Sony Australia Limited employees would receive priority training which covered modern slavery risks and modern slavery compliance generally.

During this reporting period, as a result of the steps taken as set out in Mandatory Criterion 4, Sony and Sony Australia Limited identified the following additional matters in respect of identifying modern slavery risks in our operations and supply chains:

***Globally***

Sony identified the following as a result of the surveys conducted as set out in Mandatory Criterion 4:

- Our supplier plants are in substantial compliance with the Supply Chain Code (as defined below).
- We identified some areas of minor non-conformance such as excessive working hours.
- Neither forced labour or child labour were identified.

### *Locally*

Sony Australia Limited identified the following additional detail concerning risks of modern slavery in respect of its key suppliers who provide merchandising and associated products and services to Sony Australia Limited:

- some suppliers do not have sufficient policies imposing standards on their own suppliers for modern slavery related risks such as those around child labour, forced and bonded labour, harsh and inhumane treatment, discrimination, or whistleblowing; and
- some suppliers do not have sufficient contractual obligations with their own suppliers for modern slavery related risks such as those around child labour, forced and bonded labour, harsh and inhumane treatment, discrimination, or whistleblowing.

## **Mandatory Criterion 4 – Actions taken to assess and address modern slavery and human trafficking risks, including due diligence and remediation processes**

### *A global approach*

Globally, 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.

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

***Due diligence.***

***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 of Sony’s own 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**”). Sony internal procedures require adherence to the standards of these Codes and implementation of an improvement plan in the event of any areas of non-compliance. The RBA Questionnaire was completed by all Sony manufacturing sites for fiscal year 2020. The results of the RBA Questionnaire are reviewed and analysed internally by Sony. All Sony manufacturing sites were deemed to be low risk based on the results of this assessment. There were no high-risk sites identified, and no areas of serious concern were identified.

***Assessment of Labor Conditions for Foreign Workers Employed at Manufacturing Sites.***

In response to increasing concerns over labor conditions of migrant workers, our global affiliates operating in Japan conduct annual assessments 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 business partners to survey their technical intern trainees in particular among foreign workers, to confirm that appropriate hiring processes were used to engage such workers at these sites. In fiscal year 2020, Sony continued to conduct document assessments to determine higher risk sites and interviewed on-site subcontractors at these sites to verify the propriety of their hiring

processes and confirm that technical intern trainees were provided proper working conditions in accordance with the labor standards set out in the Supply Chain Code.

### ***Supply Chain Assessments and Audits***

As set out below (“***Contract Terms***”), all new and existing suppliers are required to comply with the Supply Chain Code. Assessments and audits are also an integral part of our overall supply chain management process.

- ***New suppliers:*** Our global affiliates conduct an evaluation of all new suppliers and their manufacturing facilities to determine their risk level based on factors such as the country and region in which they are located, size of business, industry, and type of business. If our global affiliates do not deal directly with the manufacturing facility, the evaluations are conducted through the trading company or the manufacturer that Sony does business with. Suppliers and their plants in certain countries and regions and/or meeting certain criterion are required to conduct a CSR self-assessment using questionnaires from the RBA. CSR self-assessments evaluate compliance with the Supply Chain Code, in particular, items related to forced labor among foreign, migrant and immigrant workers, which has become a serious issue worldwide. If a supplier is suspected to be in violation of the Supply Chain Code, an on-site visit is conducted and employees and managers are interviewed in person to verify the actual management situation. Sony issues improvement instructions if needed, verifies the improvement results, and assesses to start business dealings.
- ***Existing suppliers:*** In fiscal year 2020, our global affiliates conducted document-based assessments of existing supplier plants located in areas other than Japan, focusing on labor issues. Assessments and interviews regarding labor, health and safety, and supply chain management were also conducted during on-site visits at supplier plants in Japan.
- ***Assessment Results for new and existing suppliers:*** Collectively, in fiscal year 2020, our global affiliates conducted a total of 564 document-based assessments for new and existing supplier plants, and also conducted on-site assessments and interviews at 6 plants. The results of these assessments were as follows:
  - The document-based assessments found no serious concerns at any plant.
  - The document-based assessments identified 86 plants with minor concerns such as excessive working hours. Sony issued instructions to suppliers that have concerns and monitors their remedial actions.
  - Subsequent on-site interviews and assessments showed that these plants are now in compliance with the standards set out in the Supply Chain Code. See more details of the

examples in page 106 in our Sustainability Report 2021 available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

- **Media and NGO reports.** In addition to information derived from our assessments and internal controls, Sony reviews media and NGO reports to help determine Sony’s highest-risk suppliers. If the reports indicate possible violations of the Supply Chain Code, Sony cooperates with the supplier in question to confirm the facts of the case expeditiously and objectively. Specifically, Sony may request a third-party RBA audit of the supplier’s manufacturing site.

In addition to the global efforts, the Australian Sony reporting entities have developed risk assessment surveys consistent with the Australian Government Guidance to apply to specific potentially higher risk suppliers. As part of that process risk assessment surveys were sent by Sony Australia Limited to those suppliers deemed highest risk by Sony Australia Limited. The Australian Sony reporting entities will continue to assess suppliers and send these surveys, ultimately educating such suppliers on Sony’s global requirements and expectations. We will also consider media and NGO reports, the Australian Government Guidance and global policies and procedures in structuring our supplier risk assessment surveys. The current status on the roll out of these supplier surveys to suppliers deemed highest risk is as follows:

<b>Australian Sony reporting entity function and activity</b>	<b>Australian Sony reporting entities</b>	<b>Supplier surveys issued</b>	<b>Responses received</b>	<b>Supplier area</b>
Consumer electronic products and professional electronic products and solutions	Sony Australia Limited	6	5	Merchandising and associated goods and services
Sale and licensing of music	Sony Music Entertainment Australia Pty Ltd SBME Holdings (Australia) Pty Ltd	Not commenced yet	Not commenced yet	Not applicable
Gaming consoles, videogames and associated peripherals, and accessories.	Sony Interactive Entertainment Australia Pty Limited Sony Interactive Entertainment Network Europe Limited	Not commenced yet	Not commenced yet	Not applicable

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

**Supplier Compliance Procedures and Adherence to Our Values**

**Supply Chain Code.** Our global affiliates are committed to working with Sony's 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 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 electronics supply chain and 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 forced, bonded or indentured labor, involuntary prison labor, slavery and human trafficking. The Supply Chain Code is available at [https://www.sony.com/en/SonyInfo/csr\\_report/sourcing/](https://www.sony.com/en/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 with direct suppliers signed when Sony begins doing business with the 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 addition to direct suppliers, Sony requires compliance with the Supply Chain Code by manufacturers and manufacturing sites supplying parts to such direct suppliers. For example, if a direct supplier is a trading company, Sony requests that the manufacturers and manufacturing sites supplying the trading company provide written confirmation that they will observe the Supply Chain Code.

**Ongoing Monitoring and Assessment of Electronics Manufacturing Operations and Supply Chain**

*i. Internal Leadership.* Sony's CSR, procurement and production groups at Global HQ take the lead in promoting Sony's responsible sourcing practices, including practices designed to prevent slavery and human trafficking. Global HQ'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.

***ii. Assessment of Labor Conditions for Foreign Workers Employed at Manufacturing Sites.***

Where necessary, our global affiliates asked Sony's 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 by checking 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 audits of a supplier's manufacturing site, our global affiliates require 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 publicises what it is doing to address human rights impacts through its Responsible Supply Chain webpage at [https://www.sony.com/en/SonyInfo/csr\\_report/sourcing/](https://www.sony.com/en/SonyInfo/csr_report/sourcing/).

***v. Remediation.***

***i. 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.

***ii. 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 global affiliates' 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 conducted by our global affiliates, the staff members of our

global affiliates provide training to Sony's 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.

At the local level, Sony Australia Limited conducted initial training in March 2021 for key stakeholders from Sony Australia Limited's procurement, compliance, facilities, marketing, service and information technology teams. The training covered:

- introduction to the concept of modern slavery;
- an overview of the Australian Modern Slavery Act;
- the Australian Government Guidance;
- key requirements for the Australian Sony reporting entities;
- risks of non-compliance;
- modern slavery indicators;
- hypothetical case studies;
- what steps Sony Australia Limited is taking; and
- Sony's global policies and procedures (including how to report an issue of concern).

#### **Mandatory Criterion 5 – How Sony assesses the effectiveness of its actions to assess and address modern slavery risks**

Globally 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 document assessments, improvements requested, and on-site visits. \*See [https://www.sony.com/en/SonyInfo/csr\\_report/sourcing/](https://www.sony.com/en/SonyInfo/csr_report/sourcing/) and our Sustainability Report 2021 for more details available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

Under the supervision of the Senior Executive Vice President in charge of Sustainability, the CSR group at Global HQ assesses external trends and communicates with stakeholders.

In addition to the global measures used to assess the effectiveness of our actions, in line with the Australian Government Guidance on this specific criterion, the Australian Sony reporting entities intend to track the specific actions we are taking locally to support our global efforts. This includes:

- tracking the progress of the roll out of the planned supplier risk assessment surveys conducted by the Australian Sony reporting entities; and
- tracking the levels of awareness among staff of the Australian Sony reporting entities by recording who has attended and completed the planned additional modern slavery training.

## **Mandatory Criterion 6 – Our Consultation Process**

As this is a Joint Statement we are required to not only describe the consultation with the entities which the Australian Sony reporting entities own or control, but also the consultation processes as between the entities providing this Joint Statement.

Each Australian Sony reporting entity appointed a stakeholder to form part of a modern slavery compliance project team for the preparation of this Joint Statement and to undertake related compliance activities.

Given that Sony is prioritising its electronic manufacturing supply chains in its Group-wide efforts, Sony Australia Limited consulted with the other Australian Sony reporting entities and Global HQ, by email communications and discussions between the entities key stakeholders.

## **Mandatory Criterion 7 – Other Relevant Information**

### **The impacts of Covid-19**

The Australian Sony reporting entities recognise the impacts of the COVID-19 pandemic on workers, government, and organisations continues to be significant. We acknowledge that the global pandemic can disproportionately impact the vulnerability of some workers and increase their potential exposure to modern slavery risks.

We will continue to monitor the impacts of Covid-19 and the potential modern slavery risks in our operations and supply chain through the measures described in this Joint Statement.

Sony Group Corporation also established the Sony Global Relief Fund for COVID-19 which provides support in three main areas: Medical, Education and the Creative Community. To find out more about the Sony Global Relief Fund for COVID-19 visit [https://www.sony.net/SonyInfo/csr/community/covid19\\_fund/](https://www.sony.net/SonyInfo/csr/community/covid19_fund/).

### **Looking ahead**

In addition to the ongoing global Sony measures, the Australian Sony reporting entities have committed to the following measures as part of our Year 3 compliance activities and commitment to continuous improvement:

#### ***Training***

- To supplement compulsory training required under our global policies and procedures, and to

build upon the training conducted to key stakeholders last year, Sony Australia Limited intends to roll out the same training to all other Australian based stakeholders in procurement, compliance, facilities, marketing, service and information technology teams.

- Sony Music Entertainment Australia Pty Ltd and Sony Interactive Entertainment Australia Pty Limited will be conducting initial training in respect of the Australian Modern Slavery Act, the Australian Government Guidance, key requirements for the Australian Sony reporting entities, modern slavery indicators, what steps we are taking and Sony's global policies and procedures.

### ***Higher risk suppliers.***

To follow-on from the initial scoping assessment and supplier surveys sent out in Year 1 and key issues identified from reviewing those surveys, Sony Australia Limited will be developing a set of template modern slavery clauses to implement in contracts with suppliers identified as higher risk. Sony Australia Limited acknowledges the Australian Government released Template modern slavery clauses, and that while these clauses are aimed at Australian Government procurement, Sony Australia Limited will be reviewing these Template clauses to gain a better understanding of the Australian Government's expectations in this space. Part of this process in developing and implementing these clauses will be communicating Sony's expectations with these suppliers in relation to managing modern slavery risks. Sony Australia Limited anticipates implementing these contractual clauses in the next reporting period. In addition, Sony Australia Limited will be exploring the possibility of modern slavery pre-screening questions when assessing and selecting suppliers.

Sony Music Entertainment Australia Pty Ltd and Sony Interactive Entertainment Australia Pty Limited will be completing an initial scoping assessment and sending out supplier surveys to those suppliers identified as higher risk.

## Approval of Joint Statement

This Joint Statement has been approved by the Board of Directors for each of the Australian Sony reporting entities in accordance with section 14 of the Australian Modern Slavery Act. The Board of Sony Australia Limited approved this statement on 20 September 2021. The Boards of Sony Music Entertainment Australia Pty Ltd and SBME Holdings (Australia) Pty Ltd approved this statement on 27 September 2021. The Boards of Sony Interactive Entertainment Australia Pty Limited and Sony Interactive Entertainment Network Europe Limited approved this statement on 28 September 2021.



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**Yuzo Otsuki**

Director

Sony Australia Limited

Date: 23 September 2021



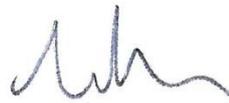
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**Andrew Smith**

Director

Sony Music Entertainment Australia Pty Ltd

Date: 27 September 2021



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**Andrew Smith**

Director

SBME Holdings (Australia) Pty Ltd

Date: 27 September 2021



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**Jim Ryan**

Director

Sony Interactive Entertainment Australia

Pty Limited

Date: 28 September 2021



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**Jim Ryan**

Director

Sony Interactive Entertainment Network

Europe Limited

Date: 28 September 2021

## **Annex – Reporting Entities**

- Sony Australia Limited ACN 001 215 354
- Sony Music Entertainment Australia Pty Ltd ACN 107 133 184
- SBME Holdings (Australia) Pty Ltd ACN 107 132 329
- Sony Interactive Entertainment Australia Pty Limited ACN 077 583 183
- Sony Interactive Entertainment Network Europe Limited Company number 06020283