Overview

Basic Approach

Sony is aware of the human rights impacts of its global business activities. Sony recognizes that respecting human rights throughout Sony’s value chain and addressing any potential human rights risks, whether the relationship with Sony’s business operation is direct or indirect, is a responsibility that a diverse range of stakeholders hold Sony accountable to. Sony has set down its fundamental human rights policy in the Sony Group Code of Conduct, which specifies that to respect human rights should be the basic stance of all Sony directors, executives, and employees.

Structure

The Sustainability Section at Sony Group Corporation is supervised by the Senior Executive in charge of Sustainability. It assesses human rights impact throughout Sony Group’s business activities and value chains. In 2021, the Sustainability, Legal, and Compliance sections at Headquarters launched a working group to implement human rights due diligence measures for the entire Sony Group’s business activities and its value chain, based on Sony’s human rights impact evaluation results and regulatory trends. The working group strives to prevent and/or mitigate any potential negative impact on human rights in collaboration with personnel at Sony businesses, including personnel in the human resources and procurement departments.

Looking to the Future

Sony aims to continue to carry out human rights due diligence, and further enhance initiatives to prevent or mitigate potential negative impact on human rights.

Milestones
1987: Human Rights Office established
1991: Human rights lectures for employees launched
1995: Sony Group Human Rights Committee established
1998: Counseling services on human rights and equal opportunities for employees initiated
2000: Philosophy and basic approach to human rights established
2003: Sony Group Code of Conduct established
2011: Human Rights Committee changed name to Diversity Committee
2012: Human Rights Impact Assessments
2018: Sony Group Code of Conduct revised
2019: Sony Group AI Ethics Committee established
2020: Human rights impact assessment updated
2021: Working group to implement human rights due diligence established

\[ \text{Sony Group Code of Conduct} \quad \text{(PDF: 2.78 MB)} \]
\[ \text{Sony Group AI Ethics Guidelines} \quad \text{(PDF: 103 KB)} \]
\[ \text{Statement on Modern Slavery Act} \]
Human Rights Due Diligence

Under the Sony Group Code of Conduct in which Sony’s policy requiring respect for human rights is set forth, Sony established and implemented group policies specific to the human rights area. Sony engages in initiatives to prevent or mitigate any potential negative impact on human rights in line with the framework set out in the United Nations Guiding Principles on Business and Human Rights (UNGPs) issued by the United Nations Human Rights Council and the OECD Guidelines for Multinational Enterprises. Specifically, Sony promotes human rights efforts in the following ways: (1) conducting human rights impact assessments, (2) identifying areas of human rights risk highly relevant to Sony’s business operations (Priority Areas) as based on the aforementioned assessments, (3) conducting activities to address Priority Areas, (4) providing grievance mechanisms (hotlines), and (5) communicating with stakeholders.

Human Rights Risk Impact Assessments

Sony has conducted group-wide human rights impact assessments since 2012 in partnership with BSR* to identify relevant risks and to work to mitigate them. Sony draws up a list of human rights issues from international standards such as the Universal Declaration of Human Rights, the ILO International Labour Standards, and the OECD Guidelines for Multinational Enterprises. We also reference source materials from human rights experts, academics, governments, NGOs and other experts to identify potential human rights risks. This information is compared to Sony’s areas of business to identify risks most relevant to Sony’s business activities.

Identifying Priority Areas

The human rights risk impact assessment carried out in 2020 identified the following as potential human rights risk areas:
- Human rights risks relating to workers in the electronics industry supply chain, including procurement of raw materials
- Potential human rights risks associated with new technologies such as AI
- Potential risks that customers with whom Sony has direct or indirect business relationships may engage in human rights abuses

Based on the above assessment, Sony Group has prioritized action in the following Priority Areas: (1) responsible supply chain, (2) respect for diversity, equity, and inclusion, and (3) responsible development and use of technologies.

Initiatives to Address Priority Areas

Responsible Supply Chain

Sony is a founding member of the RBA* and has played an active role on the RBA Board of Directors since 2020. The RBA Code of Conduct represents industry best practices; Sony was not only involved in its formulation but also adopted it as the Sony Supply Chain Code of Conduct. Sony electronics manufacturing sites and suppliers are also requested to comply with the Sony Supply Chain Code of Conduct. Sony has been participating in the CSLN Assistive Technology Conference, where many people with disabilities attend, to provide people with diverse needs the opportunity to experience Sony products and services and engage in dialogue with Sony.

Employees

Through the Global Social Justice Fund, Sony continues to promote diversity, equity and inclusion (DE&I) internally and externally and support organizations that promote social justice and anti-racism initiatives.

Employees

Sony’s Two Global Funds

Accessibility: Sony is committed to an inclusive future and strives to enable and empower individuals of all abilities to share Kando (emotion) and create a world where everyone belongs by enhancing the accessibility of its products, services, and experiences. As part of this role, Sony is promoting accessibility and inclusive design initiatives group-wide so that as many customers as possible can enjoy Sony products and services. Sony has been participating in the CSUN Assistive Technology Conference, where many people with disabilities attend, to provide people with diverse needs the opportunity to experience Sony products and services and engage in dialogue with Sony.

Quality and Customer Service

Sony Group Web Portal: Accessibility

Advertising Creativity and Content Services: As a company that conducts business in various regions and countries across the globe, Sony recognizes that conduct which is socially and professionally acceptable in one culture or region may be viewed differently in another culture. As such, Sony takes those differences into account in its decision making. Advertising personnel from Sony Group companies in Japan regularly meet to exchange information on and study human rights issues with respect to advertising. Sony is a founding member of the RBA* and has played an active role on the RBA Board of Directors since 2020. The RBA Code of Conduct represents industry best practices; Sony was not only involved in its formulation but also adopted it as the Sony Supply Chain Code of Conduct. Sony electronics manufacturing sites and suppliers are also requested to comply with the Sony Supply Chain Code of Conduct. Sony has been participating in the CSLN Assistive Technology Conference, where many people with disabilities attend, to provide people with diverse needs the opportunity to experience Sony products and services and engage in dialogue with Sony.

Respect for Diversity, Equity and Inclusion

Sony is committed to creating a workplace that respects human rights and provides equal employment opportunities that allow all individuals to make the most of their capabilities. Sony also helps to ensure that workers’ rights are safeguarded by adhering to worker protection laws, regulations, and standards in all regions where it operates.

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Sony Interactive Entertainment (SIE) applies Computer Entertainment Rating Organization (CERO), Entertainment Software Rating Board (ESRB), and Pan European Game Information (PEGI) ratings to its PlayStation game titles, adhering to the age-based recommendations of ratings organizations in Japan, the United States, and Europe, respectively.
Sony Pictures Entertainment (SPE) also implements various DE&I initiatives that impact every area of its business, including its content. For example, SPE collaborates with global nonprofit organizations, including the Geena Davis Institute on Gender in Media, the American Black Film Festival, and the Gay & Lesbian Alliance Against Defamation to identify ways to increase positive and diverse gender images onscreen and among creators involved in production.

**Responsible Development and Use of Technologies**

Sony recognizes that our stakeholders have expectations regarding our ability to both grow our business and solve social and environmental issues through technology. Sony believes that it is an important mission of Sony to lead and contribute to the resolution of sustainability issues, not only by increasing business revenue through the technologies and products it develops, but also by having a positive impact on society and the environment. Sony, with the aim of utilizing AI technology to enrich people’s lifestyles and contribute to the development of society, will pursue accountability and transparency while actively engaging in dialogue with stakeholders. Sony will continue to promote responsible AI pursuant to the Sony Group AI Ethics Guidelines in order to maintain stakeholder trust in all of its products and services.

**Grievance Mechanisms (Hotlines)**

Sony has established the following hotlines for employees and stakeholders to report and seek advice concerning any potential violation of laws, regulations, the Sony Group Code of Conduct, the Sony Supply Chain Code of Conduct or the company’s agreements with suppliers.

- **EEO (Equal Employee Opportunity) Hotlines**
  Sony Group companies in Japan have established a hotline for employees to report misconduct by a Sony Group company executive or employee that violates laws, regulations, the Sony Group Code of Conduct, the Sony Supply Chain Code of Conduct or the company’s agreements with suppliers.

- **Supplier Hotline**
  Sony has established a supplier hotline as a mechanism for suppliers to report misconduct that violates the Sony Group Policy for Responsible Supply Chain of Minerals.

- **Supplier Hotline (in Japanese)**
- **Sony Group Policy for Responsible Supply Chain of Minerals Hotline**
  Sony has established a hotline for stakeholders to report misconduct that violates the Sony Group Policy for Responsible Supply Chain of Minerals.

- **Sony’s Ethics and Compliance Program**
  Sony established the Sony Ethics & Compliance Hotline as a mechanism for all Sony Group employees to raise concerns and to seek guidance about possible violations of laws or internal policies, including violations of the Sony Group Code of Conduct.

- **Use of Technology Responsible AI**

- **AI Initiatives (Corporate Website)**

**Supplier Hotline**

Sony has established a supplier hotline as a mechanism for suppliers to report misconduct by a Sony Group company executive or employee that violates laws, regulations, the Sony Group Code of Conduct, the Sony Supply Chain Code of Conduct or the company’s agreements with suppliers.

**Sony Group Policy for Responsible Supply Chain of Minerals Hotline**

Sony has established a hotline for stakeholders to report misconduct that violates the Sony Group Policy for Responsible Supply Chain of Minerals.

**Education and Training**

Human rights issues that corporations face today are increasingly complex and wide-ranging. Sony considers it essential to boost awareness of human rights, an awareness that underpins respect for diversity.

**Employee Training**

All Sony employees receive training on respecting human rights and preventing harassment in the workplace upon hire. Refresher training is also provided at least every four years thereafter. In Japan, we regularly implement various programs, such as focusing on domestic issues for all employees and using more practical content for newly appointed managers. In addition, an e-learning course focusing on the protection of human rights is provided to all employees of Sony Group Corporation as well as many Sony Group companies. In fiscal year 2022, 94% of eligible employees took the e-learning course.

**Raising Employee Awareness of Human Rights**

Sony Group companies in Japan have formed their diversity promotion committees, which conduct workshops on human rights, diversity, and related matters. Based on the information obtained from those initiatives, they collaborate laterally via a diversity liaison to share best practices and study the latest information. Serious cases of harassment and communication issues related to human rights are discussed within the overall system and appropriate responses considered. Additionally, Sony works with the International Federation for Human Rights, Tokyo to compile information on various aspects of the subject and improve human rights literacy in Japan. Each December, in support of Human Rights Week, Sony holds a forum for learning about themes related to human rights, in addition to presenting awards for outstanding diversity messages (human rights awareness slogans) composed by employees of Sony Group companies.

**Sustainability Report 2023**

Sony Group companies outside of Japan have similar programs in place to ensure respect for human rights in the workplace.