

# Responsible Supply Chain



## Overview

### Basic Approach

In recent years, stakeholders have grown increasingly aware of how crucial it is that companies fulfill their overall responsibilities throughout their supply chains. Sony takes these stakeholder concerns seriously and is working closely with its suppliers on initiatives in fields such as human rights, labor conditions, health and safety, and environment. These initiatives cover not only Sony's own sites, but sites throughout the supply chain from suppliers, to mineral mining operations, to production sites operated both by Sony and by contract manufacturers.

Each and every executive and employee complies with the Sony Group Code of Conduct and conducts ethical business practices. Based on this approach, Sony works with suppliers and contract manufacturers to establish a responsible supply chain in our electronics business that ensures compliance with the Sony Supply Chain Code of Conduct and the Sony Group Policy for Responsible Supply Chain of Minerals. These efforts are undertaken in collaboration with relevant industry organizations and other stakeholders.

### Structure

Under the Senior Executive in charge of Sustainability, the Sustainability Section at the headquarters plays central roles in promoting actions aimed toward creating a more responsible supply chain, cooperating with procurement and other related departments in our businesses, as well as management departments at manufacturing sites.

## Looking to the Future

In order to further strengthen efforts to establish a responsible supply chain, Sony will expand assessments of its own sites and its suppliers, for example by having primary suppliers request secondary suppliers to comply with the Sony Supply Chain Code of Conduct. Sony remains committed to ongoing efforts to raise awareness, educate, and provide training not only to employees, but also across the supply chain, communicating with suppliers to raise awareness and the capacity to respond effectively to responsible supply chain issues. Sony will work with a variety of stakeholders as it continues to strengthen its countermeasures for high-risk minerals in its procurement.

#### ■ Milestones

- 2004: Became a founding member of the EICC (now the Responsible Business Alliance)
- 2005: Sony Supplier Code of Conduct established
- 2006: EICC self-assessment started at electronics manufacturing sites
- 2012: Sony Supplier Code of Conduct revised to create second edition
- 2014: Sony Group Conflict Minerals Policy established and a survey on use of conflict minerals started
- 2016: Sony Supply Chain Code of Conduct established and cobalt supply chain assessment started
- 2017: Sony Group Policy for Responsible Supply Chain of Minerals established
- 2021: Sony Pictures Entertainment Supplier Code of Conduct established
- 2022: Sony Music Supplier Code of Conduct established
- 2023: Sony Interactive Business Principles established
- 2024: Sony Supply Chain Code of Conduct revised to create 4.0 edition

[Sony Supply Chain Code of Conduct \[PDF:485KB\]](#)

[Sony Group Policy for Responsible Supply Chain of Minerals \[PDF:282KB\]](#)

[Sony Group Portal Website | Grievance System for Sony Group Electronics Supply Chain](#)

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# Supply Chain Management

We are engaged in supply chain management that includes the production sites of our suppliers and contract manufacturers in addition to our own electronics manufacturing sites.

## Supply Chain for Electronics Products

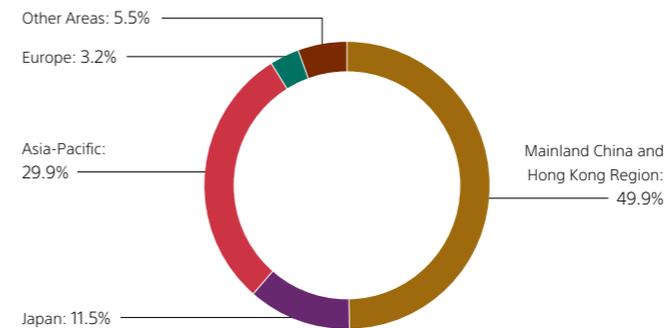
Sony develops, designs, manufactures and sells a wide range of electronics and other devices, utilizing an electronics supply chain that stretches across the entire globe. As of August 2025, we have 11 electronics manufacturing sites in Japan, China, South Korea, Thailand, Malaysia, and the UK. Further, we procure materials and parts for Sony electronics from suppliers worldwide.

In fiscal year 2024, the value of transactions with raw materials/parts suppliers and contract manufacturers (OEM/ODM suppliers) by geographic area was as follows: Mainland China and Hong Kong Region (49.9%), Japan (11.5%), Asia-Pacific (29.9%), Europe (3.2%), and other areas (5.5%).

Electronics manufacturing sites at Sony (as of August 2025)

Location	Site
Japan	Sony Global Manufacturing & Operations Corporation Sony Semiconductor Manufacturing Corporation Sony Storage Media Corporation Sony / Taiyo Corporation
China	Shanghai Suoguang Visual Products Co., Ltd. Sony Digital Products (Wuxi) Co., Ltd.
South Korea	Sony Electronics of Korea Corp.
Thailand	Sony Technology (Thailand) Co., Ltd. Sony Device Technology (Thailand) Co., Ltd.
Malaysia	Sony EMCS (Malaysia) Sdn. Bhd.
UK	Sony UK Technology Centre Ltd.

Raw Materials/Parts and OEM/ODM supplier ratio by geographic area (transaction value basis in FY2024)



Note: Major countries and regions that belong to each category  
 • Asia-Pacific: Southeast Asia, India, Oceania, Taiwan Region and South Korea  
 • Other Areas: Middle East, Latin America, Africa, United States and Canada  
 The amount is calculated based on the location of the company registration of supplier

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## Establishing and Promoting the Sony Supply Chain Code of Conduct

Sony recognizes the increasing importance of global companies' responsibility to manage their supply chains responsibly as diligent members of society. This extends beyond our manufacturing sites, including those of parts suppliers and contract manufacturers. Sony works with its suppliers to address issues such as human rights, labor conditions, health and safety, and environmental protection throughout its supply chain in order to ensure a responsible supply chain.

### Sony Supply Chain Code of Conduct

Sony was involved in establishing the RBA Code of Conduct, which indicates electronics industry best practice, and adopted that code to establish the Sony Supply Chain Code of Conduct. Sony actively implements efforts to comply with the code for our manufacturing sites, service suppliers providing services to those sites, contract manufacturers and materials/parts suppliers. The RBA Code of Conduct has been translated into 28 languages including English, Chinese, Japanese, Thai, and Malay. The fourth edition of the Sony Supply Chain Code of Conduct has been revised to ensure it is in line with the eighth edition of the RBA Code of Conduct, released January 2024. Compliance with the Sony Supply Chain Code of Conduct is included in contracts signed when Sony begins doing business. As a part of the customer requirements under this Code of Conduct, contract manufacturers and raw materials/parts suppliers must comply with the Green Partner Environmental Quality Approval Program and the Sony Group Policy for Responsible Supply Chain of Minerals. Suppliers are also requested to distribute and comply with the Sony Supply Chain Code of Conduct within their own supply chain. In addition, as a founding member of the RBA, Sony also works to strengthen its supplier assessments, ongoing monitoring, and other initiatives.

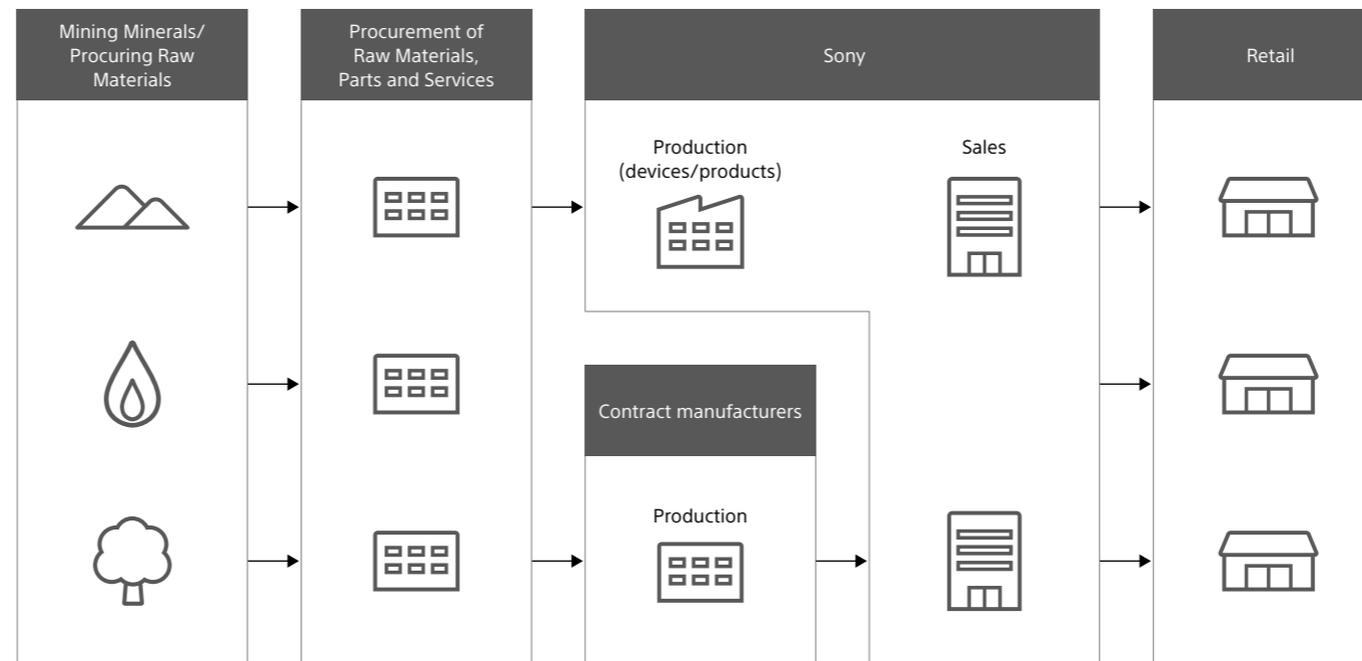
→ [Sony's Sustainability \(Partnership and Participation in Multi-Stakeholder Frameworks\)](#)

→ [Participation in the Responsible Business Alliance \(RBA\)](#)

📄 [Sony Supply Chain Code of Conduct \[PDF:485KB\]](#)

🔗 [Responsible Business Alliance](#)

Basic Structure of the Supply Chain



Sony Supply Chain Code of Conduct Items

A. Labor	B. Health and Safety	C. Environment	D. Ethics	E. Management Systems
1 ) Prohibition of Forced Labor 2 ) Young Workers 3 ) Working Hours 4 ) Wages and Benefits 5 ) Non-Discrimination/ Non-Harassment/ Humane Treatment 6 ) Freedom of Association and Collective Bargaining	1 ) Occupational Health and Safety 2 ) Emergency Preparedness 3 ) Occupational Injury and Illness 4 ) Industrial Hygiene 5 ) Physically Demanding Work 6 ) Machine Safeguarding 7 ) Sanitation, Food, and Housing 8 ) Health and Safety Communication	1 ) Environmental Permits and Reporting 2 ) Pollution Prevention and Resource Conservation 3 ) Hazardous Substances 4 ) Solid Waste 5 ) Air Emissions 6 ) Materials Restrictions 7 ) Water Management 8 ) Energy Consumption and Greenhouse Gas Emissions	1 ) Business Integrity 2 ) No Improper Advantage 3 ) Disclosure of Information 4 ) Intellectual Property 5 ) Fair Business, Advertising and Competition 6 ) Protection of Identity and Non-Retaliation 7 ) Responsible Sourcing of Minerals 8 ) Privacy	1) Company Commitment 2) Management Accountability and Responsibility 3) Legal and Customer Requirements 4) Risk Assessment and Risk Management 5) Improvement Objectives 6) Training 7) Communication 8) Worker/Stakeholder Engagement and Access to Remedy 9) Audits and Assessments 10) Corrective Action Process 11) Documentation and Records 12) Supplier Responsibility

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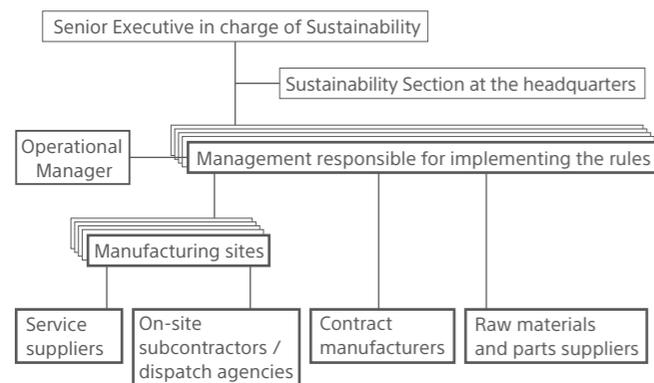
## Organizational Structure

At Sony, the Sustainability Section at the headquarters takes the lead in promoting efforts toward a responsible supply chain in cooperation with other related divisions (sustainability, procurement, production, etc.) and management departments at manufacturing sites.

Under the supervision of the Senior Executive in charge of Sustainability, the Sustainability Section at the headquarters 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 the management responsible in each relevant business unit. They are then responsible for overall operational compliance for the area in their charge, including compliance with the Sony Supply Chain Code of Conduct, as well as risk assessment, regular monitoring and remedial measures.

In cases where assessments or external sources indicate any possibility of violations of the Sony Supply Chain Code of Conduct or a material legal violation, or in cases where the supplier does not provide adequate cooperation with assessments and audits, the management responsible for implementing the rules work together with the Sustainability Section and Compliance Section at the headquarters to determine the facts and take action deemed necessary, and the situation is reported to the Senior Executive in charge of Sustainability.

### Implementation Framework of the Sony Supply Chain Code of Conduct



## Initiatives at Sony Manufacturing Sites

### Sony Supply Chain Code of Conduct Notification

Sony has notified all of its manufacturing sites and their service suppliers regarding the fourth edition of the Sony Supply Chain Code of Conduct. Sony additionally distributes, provides notification and obtains a declaration of compliance when entering into new contracts or revising the Code of Conduct.

### Conducting Regular Assessments

As part of its efforts to ascertain Sony manufacturing sites' compliance with the Sony Supply Chain Code of Conduct, Sony uses standard tools provided by the RBA to check compliance, assess improvements, and implement other monitoring activities.

Specifically, Sony utilizes the RBA questionnaire as an annual self-assessment survey at all of its electronics manufacturing sites to evaluate compliance designated by the Sony Supply Chain Code of Conduct in terms of labor, health and safety, ethics, environment, and management systems. At manufacturing sites where self-assessment surveys indicate issues with compliance and further evaluation and improvement in these areas are deemed necessary, appropriate measures to improve compliance are developed and implemented. Additionally, we regularly conduct RBA or other equivalent audit at some manufacturing sites.

In fiscal year 2024, 12 manufacturing sites (as of August 2024) in Japan, China, Korea, Thailand, Malaysia and the UK completed self-assessment surveys. The results showed no manufacturing sites were considered high risk according to RBA criteria. Additionally, some of our manufacturing sites in Japan and China have undergone third-party RBA audits, and have all received Silver Status.

In addition, Sony conducted a written risk assessment survey of 168 identified service suppliers that provide services to its manufacturing sites to ascertain their level of compliance with the Sony Supply Chain Code of Conduct. If any compliance issues are revealed, we review the plan for improvement and follow up to confirm progress.

## Employment and Working Conditions of Foreign Workers

In recent years, forced labor among foreign and immigrant workers at factories that manufacture electronic products and components has become an issue both in Japan and around the world.

In response, Sony conducts self-assessments regarding employment status of its foreign workforce via the RBA questionnaire. The assessments check whether the site has any foreign workers or not (in either direct or indirect employment) and confirm the hiring processes and labor conditions. Since 2020, Sony has continued to conduct document assessments of a number of domestic on-site contract manufacturers 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 showed that steps are continually being taken to ensure compliance with the labor standards set out in the Sony Supply Chain Code of Conduct overall. This includes the establishment of a new policy on freely chosen employment and recruitment fees for on-site subcontractors who did not previously have such policies in place, or other improvements. In order to prevent technical intern trainees from paying fees, we request that on-site contract manufacturers comply with the Sony Supply Chain Code of Conduct, obtaining a declaration of compliance.

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## Sony's Approach to Supplier Relations

### Requesting Compliance and Monitoring Compliance Status with the Sony Supply Chain Code of Conduct

#### Requesting Compliance

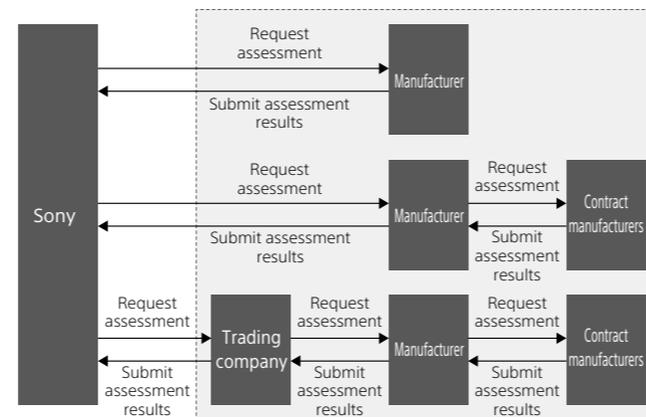
Compliance with the Sony Supply Chain Code of Conduct is included in contracts signed when Sony begins doing business with raw materials and parts suppliers. All suppliers are provided this Code of Conduct upon signing a new contract, and are kept informed of changes through updated documents. Further, Sony regularly reminds suppliers of their responsibilities and obtains a declaration of compliance from them. In fiscal year 2024, Sony announced the revised Sony Supply Chain Code of Conduct to its raw materials and parts suppliers, obtaining a declaration of compliance from them. When starting new business dealings with suppliers, Sony requests compliance with the Sony Supply Chain Code of Conduct not only from the primary supplier, but also from plants supplying materials and parts. Furthermore, if a primary supplier is a trading company, Sony acquires a declaration of compliance from the parts manufacturer and manufacturing sites through the trading company and confirms that compliance is implemented. Sony also distributes the Sony Supply Chain Code of Conduct to our own supply chain, requesting through primary suppliers that it is observed by secondary and further suppliers.

#### Supplier Assessment

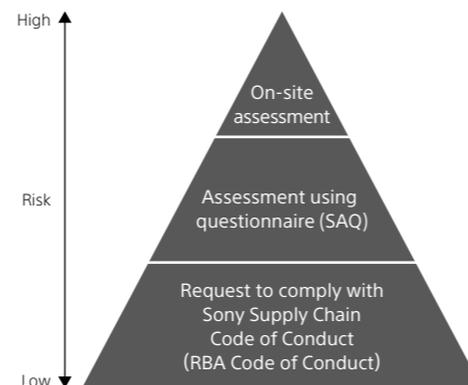
To ascertain supplier compliance with the Sony Supply Chain Code of Conduct, Sony conducts assessments based on the supplier's risk level for all raw materials/parts suppliers and their manufacturing facilities. If Sony does not deal directly with the manufacturing facility, the assessments are conducted through the trading company or manufacturer that is the primary supplier. If a manufacturer is suspected to be in violation of the Sony Supply Chain Code of Conduct, instructions for improvement are issued, on-site assessments and third-party audits are conducted and employees and managers are interviewed in person to verify the actual management

situation, based on the identified potential risk. Assessments are similar to those indicated in RBA standards, and include contracts and other documentation, working hours, policies, procedures and health and safety verification. If issues are found, guidance for improvement is provided, and we continue to verify and evaluate subsequent actions taken. Sony's policy is to review its business relationship with a supplier if a serious violation (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) of the Sony Supply Chain Code of Conduct is confirmed or if the supplier fails to cooperate fully in an investigation or audit.

#### Scope of Supplier Assessment



#### Risk-Based Supplier Assessment



#### New Suppliers

Sony conducts assessments based on the supplier's risk level for all new OEM/ODM suppliers and raw materials/parts suppliers and their manufacturing facilities. All direct suppliers and their plants are requested to comply with the Sony Supply Chain Code of Conduct. Suppliers and their plants are 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. Suppliers and their plants conduct an assessment using RBA questionnaires or the questionnaire on labor, health and safety, environment, and ethics based on the RBA Code.

In assessment, questionnaires evaluate compliance with the Sony Supply Chain Code of Conduct specifically in items related to forced labor among foreign, migrant and immigrant workers, which has become a serious issue worldwide. Supplier response is analyzed to identify potential risks for individual manufacturing plants. We also utilize third-party screening tools to check for human rights violation risks (human trafficking, child labor, forced labor, etc.) at target supplier sites.

#### Existing Suppliers

Major OEM/ODM suppliers that do sizable business with Sony continue to conduct annual assessments using questionnaires from the RBA. If an assessment indicates a high risk, the OEM/ODM supplier is subject to an on-site audit, which may include an audit by a third-party.

Furthermore, with growing stakeholder interest in the issue of forced labor in the electronics industry supply chain overall, Sony has been strengthening activities related to periodic assessment of existing raw materials and parts suppliers for compliance with the Sony Supply Chain Code of Conduct since 2020. Just as for new suppliers, existing suppliers and their plants are 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. Assessment using RBA questionnaires or the questionnaire on labor, health and safety, environment, and ethics based on the RBA Code is conducted for applicable existing suppliers, and supplier response is analyzed to identify potential risks for individual manufacturing plants.

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## Assessment Results for Fiscal Year 2024

### New Suppliers

Assessments using questionnaires were conducted for 43 plants. We provided written instructions for improvement to 4 supplier plants deemed to be in minor violation. We conducted on-site assessments and third-party audits at 1 supplier plant suspected to be in violation, pointing out issues and issuing instructions for improvement. In either case, suppliers are asked to make a plan for improvement, manage progress and show evidence-based results.

### Existing Suppliers

Assessments using questionnaires were conducted for 324 plants. We provided written instructions for improvement to 17 supplier plants deemed to be in minor violation. We conducted on-site assessments and third-party audits at 18 supplier plants suspected to be in violation pointing out issues and issuing instructions for improvement, either remotely or in-person. In either case, suppliers are asked to make a plan for improvement, manage progress and show evidence-based results.

### Assessments of New and Existing Suppliers

(Figures indicate the number of plants)

Content	FY2022	FY2023	FY2024
Assessment using questionnaire	406	235	367
Written improvement instructions	75	9	21
Remote assessment / on-site assessment	64	12	19

### Top 5 violations identified through on-site assessment (FY2024)

Over 60 hrs. work/week	4.1%
Unable to take a day off in 7 days	3.8%
Insufficient management processes due to poor implementation of code of conduct	3.8%
Code of conduct not communicated to Supplier's partners	3.3%
Insufficient management of legal requirements	2.5%
No written contract in understandable language / contract details not communicated before leaving the country	2.5%

\* Violation ratios confirmed via on-site evaluation vs. total number of assessments using the questionnaire. Includes cases where multiple violations were identified at the same supplier during on-site assessments.

### Examples of Instructions for Improvement

#### ■ Working hours

Observation: Overtime hours at a supplier (over 60 hours/week)  
Improvement instructions: Requested a plan for improvement of working hours, continuously monitored until improvements are completed

#### ■ Evacuation exit access

Observation: Locked evacuation exit  
Improvement instructions: Requested to unlock entryways that might obstruct emergency evacuation and confirmation of results.

#### ■ Requests for compliance from suppliers to their partners

Observation: Code of conduct not communicated and compliance not requested  
Improvement instructions: Requested communication and compliance of the code of conduct to their partners, and confirmation of implementation.

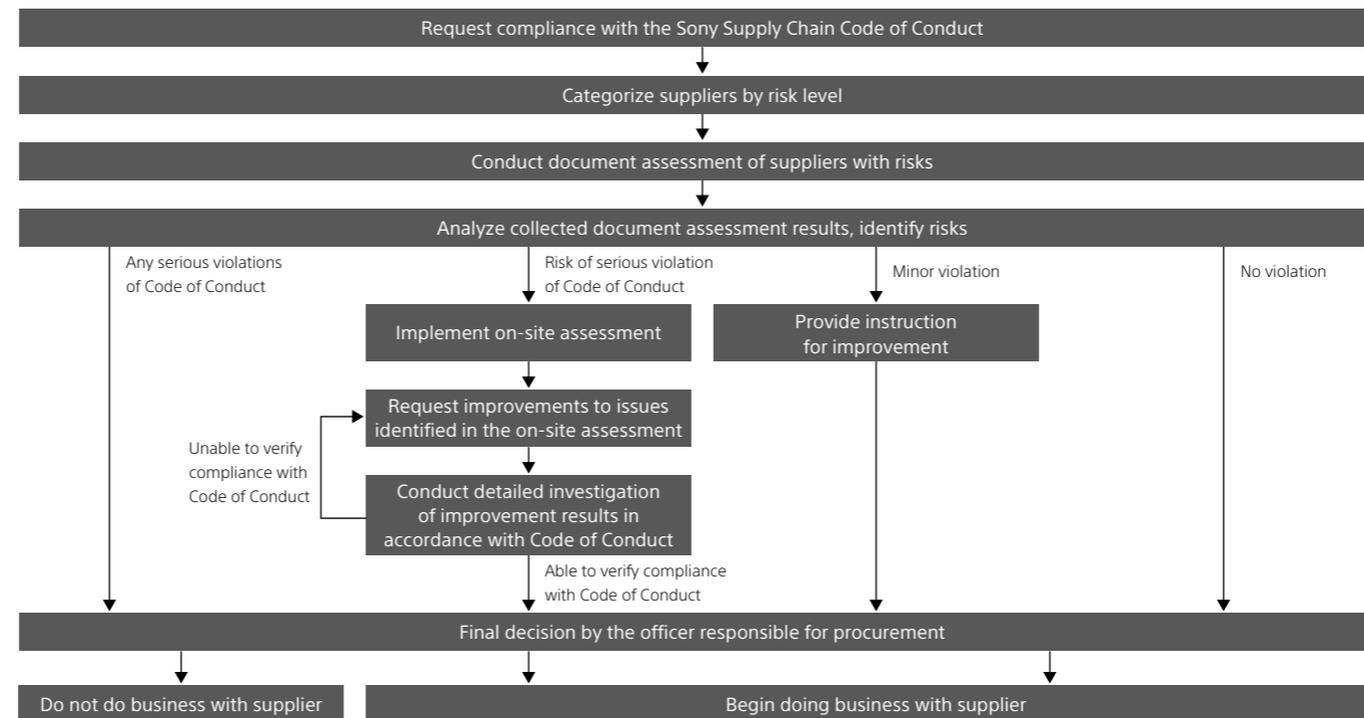
### Conducting additional assessments through on-site visit

In addition to regular assessments, procurement staff from a local manufacturing site conduct on-site assessments for suppliers in areas considered high risk based on previous assessment results. In fiscal year 2024, we conducted assessments that included worker interviews for facilities employing foreign migrant workers.

### Example of remedy for affected workers

Sony confirmed that a third-party Malaysian supplier has violated the Supply Chain Code of Conduct regarding employment and labor. As there has not been significant progress implementing corrective measures requested by Sony, Sony has discontinued sourcing from the supplier. Sony has worked with the RBA to provide financial support to affected workers.

### Assessment Flow at Start of New Transactions with Suppliers



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## Communicating with Suppliers

Sony is deeply committed to communicating with suppliers and is involved in a variety of measures to this effect.

### Distributing Videos and Providing Education for Raw Materials and Parts Suppliers

We conduct educational and awareness-raising activities to help people better understand the responsible supply chain and other Sony sustainability initiatives. In fiscal year 2023, we distributed a video explaining Sony sustainability and procurement policies to suppliers with whom we engage beyond a certain level. The video detailed the content of the Sony Supply Chain Code of Conduct, responsible sourcing of minerals and climate change initiatives, and further requested supplier cooperation in these endeavors. In fiscal 2024, we once again explained Code of Conduct requirements when procurement staff conducted on-site assessments, and also once again requested compliance at a conference in China, actively communicating with suppliers on a regular basis to ensure understanding of our sustainable procurement endeavors.

### Visualizing Supplier Sustainability Efforts

We check for supplier compliance with the Sony Supply Chain Code of Conduct, which includes their efforts for human rights, ethics, environmental and health and safety initiatives, and this oversight is vital to our supplier selection process. In consideration of the fact that supplier sustainability activities will continue to grow more important, we built and began implementing a system to visually identify and centrally manage supplier sustainability achievement (including compliance with the Sony Supply Chain Code of Conduct, reducing the effect on the environment). We communicate the meaning and social significance of these efforts, providing direct feedback to our suppliers to motivate them toward sustainable endeavors and maintain their compliance with the Sony Supply Chain Code of Conduct.

## Purchasing Practices

Presenting suppliers with procurement plans and outlooks helps to mitigate negative impact on recruiting and working conditions. Therefore, we provide a six-month procurement forecast with our primary suppliers in order to secure capacity well in advance, the content of which is reviewed weekly from the start of mass production. The lead time agreed to between the supplier and Sony is registered in the system and a purchase order is issued according to that lead time. Any major changes to the order are discussed with the supplier in compliance with applicable laws and regulations.

### Establishing Contact Points for Suppliers and Stakeholders

Sony has made two contact points available for supply chain issues. Both accept reports via dedicated inquiry forms on their websites. Anonymous reports are also accepted, and we clearly state that reporters will suffer no repercussions for making a report. Sony once again introduced these to all suppliers with whom we do above a certain amount of business with via a video distributed in fiscal year 2023, requesting that all employees and upstream suppliers also be informed. In fiscal year 2024, we notified suppliers regarding these contact points once again when Sony announced the Supply Chain Code of Conduct and requested a declaration of compliance.

#### Supplier Hotline

Sony has established a Supplier Hotline which suppliers may use to report conduct by a Sony Group company executive or employee that violates laws, regulations, the Sony Group Code of Conduct, or the Sony Supply Chain Code of Conduct, as well as conduct that violates the company's agreements with suppliers as a framework to facilitate sharing of concrete information.

[☞ Sony Group Portal Website | Supplier Hotline \(in Japanese\)](#)

### Grievance System for Sony Group Electronics Supply Chain for Reporting from a Broad Range of Stakeholders

Sony established the Grievance System for the 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 in March 2024. A dedicated online inquiry form is provided to report any actions across the electronics supply chain that violate or may violate the Sony Supply Chain Code of Conduct or the Sony Group Policy for Responsible Supply Chain of Minerals.

We received 23 reports, including a case concerning employment and labor at suppliers in Asia in fiscal year 2024.

If corrective actions are necessary as a result of investigation, we take reasonable corrective action as appropriate.

[☞ Sony Group Portal Website | Grievance System for Sony Group Electronics Supply Chain](#)

## Capacity Building for Procurement Personnel

### Training and Raising Awareness in Internal Procurement Personnel

We implement training for employees who are involved in procurement for socially responsible procurement and the Sony Supply Chain Code of Conduct.

In fiscal year 2023, managers from the Sustainability Section held discussion-focused training sessions to deepen understanding on human rights issues in the supply chain and the need for initiatives to curb climate change to managers in departments involved in procurement of raw materials and parts. All raw materials and parts procurement personnel also received additional training regarding Sony sustainability and procurement policy and initiatives, including basic information on efforts to curb climate change, such as greenhouse gas emissions reduction targets and measures to achieve them. We further detailed risks related to human rights violations identified in supplier assessments to the person in charge of contact with suppliers, and conducted training to reaffirm that processes and measures necessary for improvement are taken when risks are discovered.

In fiscal year 2024, we continued to provide training to raw materials and parts procurement personnel regarding human rights, climate

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change and Sony sustainability initiatives in the supply chain. These efforts included training to ensure understanding of risks related to human rights violations and health and safety identified in supplier assessments, as well as to facilitate the use of checklists to identify risks at supplier sites and provide guidance for improvement when visiting these sites. We conducted training regarding how to promote basic climate change measures on site, including social trends related to climate change, GHG emission calculation methods, and examples of how we have incorporated renewable energy at our manufacturing sites. Content of training videos is further available online to ensure procurement personnel have access to them whenever they are needed.

We also held a Global Procurement Meeting which brought together regional managers for an intensive discussion on how to address human rights issues in the supply chain.

We continue to work to provide training and forums for discussion on building a responsible supply chain that includes managers and employees.

## Responding to External Reports

In cases where any possibility of violations of the Sony Supply Chain Code of Conduct is reported via external sources, such as NGOs or media reports, we work expeditiously and objectively to confirm facts regarding the report, including an RBA audit by a third-party auditor. If this determination confirms the reported violations at our manufacturing sites, Sony ensures that corrective action is immediately taken. At supplier plants, we promptly request to make an improvement plan. We request progress reports for implementation of these plans and check further by conducting follow-up audits as needed. In cases where any possibility of violations is reported at a secondary supplier, Sony works with the primary supplier to ensure that remedial action is carried out. Sony's policy is to review its business relationship with a supplier if a serious violation of the Sony Supply Chain Code of Conduct is confirmed or if the supplier fails to cooperate fully in an investigation or audit.

## Participation in the Responsible Business Alliance (RBA)

Supply chains overlap considerably in the electronics industry, with multiple manufacturers of finished products sharing the same subcontractors and parts suppliers. Accordingly, there are fears that the introduction of independent, company specific standards for socially responsible management will cause confusion and constitute a significant burden on companies in the supply chain.

With the aim of improving processes in the electronics industry supply chain, in 2004 Sony and other companies established the Electronic Industry Citizenship Coalition (EICC, currently the RBA). The alliance then developed the RBA Code of Conduct (formerly the EICC Code of Conduct) incorporating best industry practices.

The RBA is working with its member companies to develop tools that help to establish and manage codes of conduct, Web-based systems, and skills development programs for suppliers. As of June 2025, the RBA consisted of more than 250 participating companies from Europe, the Americas and Asia, and members included manufacturers and OEM companies. The RBA has membership categories for different levels of engagement and has granted Full Member status to Sony, its highest membership category. Additionally, Sony has worked as a member of the RBA Board of Directors from 2020 to 2024.

The RBA promotes corporate social responsibility (CSR) in supply chains through the Responsible Minerals Initiative (RMI), which addresses issues with minerals procurement, the Responsible Labor Initiative (RLI), which addresses human rights issues such as forced labor, and other programs.

→ [Sony's Sustainability \(Partnership and Participation in Multi-Stakeholder Frameworks\)](#)

🔗 [Responsible Business Alliance](#)

## Supplier Code of Conduct in Entertainment Business

Sony is committed to enhancing Sony Group's responsible supply chain activities in the entertainment industry in order to strengthen its supplier programs related to standards for human rights, ethical business practices, safety and environment.

In March 2021, Sony Pictures Entertainment established the Sony Pictures Entertainment Supplier Code of Conduct. A link to the Supplier Code of Conduct is provided to relevant global suppliers as part of SPE's vendor onboarding and due diligence process covering topics such as ethics, integrity, and sustainability. Then, in March 2022, Sony Music Entertainment established the Sony Music Entertainment Supplier Code of Conduct. These codes of conduct are based on principles similar to those of the Sony Supply Chain Code of Conduct, and we are working to raise awareness of both.

Sony Interactive Entertainment (SIE) is committed to complying with all applicable laws and regulations and to conducting business in an honest, ethical, and responsible manner. SIE expects its business partners to do the same. SIE launched its Business Principles in March 2024, which set out SIE's expectations, standards and guidelines for doing business with SIE and on SIE's behalf. The Business Principles are published on the SIE website and included in SIE's contracts with all high-risk business partners not subject to the Sony Supply Chain Code of Conduct.

🔗 [Sony Pictures Entertainment Supplier Code of Conduct](#)

🔗 [Sony Music Supplier Code of Conduct](#)

🔗 [Sony Interactive Business Principles](#)

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# Responsible Sourcing of Minerals

In recent years, stakeholders have become increasingly concerned about violations of the human rights of workers and environmental issues in the sourcing of mineral resources essential for the manufacture of electronic products. Sony is working with its suppliers to address issues related to human rights, labor conditions, health and safety, and environmental protection at production sites, as well as in its procurement of minerals.

## Establishing the Sony Group Policy for Responsible Supply Chain of Minerals

Some minerals that are used in Sony products carry human rights and environmental risks in the extraction process.

In the Sony Group Code of Conduct, Sony set forth basic policies including prohibition of using any form of forced labor, specifically, child labor. Sony has established the Sony Supply Chain Code of Conduct to be complied with throughout the electronics product supply chain.

In addition, in October 2017, Sony established the Sony Group Policy for Responsible Supply Chain of Minerals, replacing the Sony Group Conflict Minerals Policy that was established in 2014.

### Basic Policy

In the policy, Sony pledges that, in order to avoid contributing to conflicts or serious human rights abuses through its sourcing practices, Sony identifies certain minerals that are sourced in conflict-affected and high-risk areas and that are high-risk for Sony from the perspective

of corporate social responsibility ("High-Risk Minerals"). Sony's policy is to refrain from knowingly purchasing any products, components or materials that contain High-Risk Minerals that contribute to conflicts or serious human rights abuses in the chain of custody.

### High-Risk Minerals

Sony conducts risk assessments to determine if high-risk minerals could be contained in our products. These assessments are carried out from four main perspectives: legal and regulatory requirements, the importance of particular business activities, requests from stakeholders and social and environmental corporate responsibility (such as child labor, forced labor, indigenous rights, conflicts, etc.). Changes to high-risk minerals are considered based on the results of regular assessments.

Tantalum, tin, gold, tungsten and cobalt were identified as high risk.

### Expectations for Suppliers

Sony requires its suppliers to source High-Risk Minerals from smelters determined to be compliant with the Responsible Minerals Assurance Process (the "RMAP") \* protocols established by the Responsible Minerals Initiative (the "RMI"), or other smelters that have been determined not to be contributing to conflicts or serious human rights abuses under other trusted traceability projects.

\* Responsible Minerals Assurance Process (RMAP) : A program in which a third party certifies that the minerals handled by the smelter are from sources that do not fund armed conflict or engage in human rights violations.

### OECD Due Diligence Guidance Initiatives

Sony exercises due diligence on the source and chain of custody of High-Risk Minerals in our supply chain to determine supplier compliance with our policy. We follow the Organization for Economic Cooperation and Development (the "OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict affected and high-risk areas (the "OECD Guidance") or other internationally recognized framework when conducting such due diligence.

[☞ Sony Group Policy for Responsible Supply Chain of Minerals \[PDF:282KB\]](#)

[→ Participation in the Responsible Business Alliance \(RBA\)](#)

## Addressing Issues with Tantalum, Tin, Gold and Tungsten (Four Minerals) Survey and Results on Use of the Four Minerals

The four minerals are commonly found in many products, ranging from jewelry to electronics and airplane components, and enter global supply chains from numerous countries. Determining the mine of origin for these minerals requires the cooperation of many levels of suppliers and intermediaries in the supply chain. Sony is committed to working with suppliers to continuously improve supply chain transparency and reduce risk.

Investigation on the origin of the four minerals used by the Sony Group overall is conducted as follows.

1. Every survey year, Sony checks each business group to see if there is any possibility for the four minerals being used in its products
2. Sony further looks for the presence of the four minerals in the products of the identified business group that are manufactured or outsourced for manufacturing by Sony in the survey year and identifies target products
3. The survey is conducted using the RMI Conflict Minerals Response Template (CMRT), the industry standard, and target suppliers are asked to participate by filling out a survey response for each product concerned in order to identify the smelters or countries of origin for the procured minerals concerned
4. The smelters indicated in the survey responses are then carefully compared to the RMI smelters list

In the 2024 survey, Sony identified a total of 339 smelters and refiners as potential sources of the four minerals and, of those, 229 smelters and refiners were compliant with RMAP\* or were contained in the London Bullion Market Association Good Delivery List or certified by the Responsible Jewellery Council (RMAP compliant).

\* Includes smelters under RMAP assessment.

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## Response for Sony Suppliers of the Four Minerals

If it is determined that any of the four minerals are used in the manufacture of products, Sony requires relevant suppliers to comply with the Sony Group Policy for Responsible Supply Chain of Minerals and to fully cooperate with its due diligence efforts regarding sourcing the four minerals in accordance with the terms of this policy. In addition, Sony expects suppliers to have pertinent policies, a due diligence framework and a management system consistent with the OECD guidance in place for products, components and materials delivered to Sony. As a part of these measures, Sony is working to propel action from suppliers who have yet to establish mineral supply chain policy.

## Mitigating Risk in the Supply Chain

In the event that Sony confirms that any of its products, components or materials may contain minerals in violation of Sony Group Policy for Responsible Supply Chain of Minerals, Sony, in collaboration with relevant suppliers, shall take actions reasonably necessary to eliminate such minerals from such products, components or materials and shall request that the supplier makes necessary improvement to its sourcing practices.

This includes adoption of a mineral supply chain policy, increased responsiveness and accuracy for surveys on the use of the four minerals, and use of the four minerals sourced from smelters or refiners participating in the RMAP program, or who are otherwise recognized as not contributing to conflict or human rights violations through other trusted mineral traceability projects. Further, in the event that Sony confirms that a supplier has failed to cooperate sufficiently with a due diligence investigation, fails to follow Sony's requests for remediation or has otherwise violated this policy, Sony shall take necessary actions, including without limitation, termination of business with such supplier by stopping new orders. As part of its efforts to promote RMAP-conformance among smelters, Sony works to encourage smelters identified in its own investigations that are not in compliance with the RMAP to come into compliance.

In 2024, 41 suppliers specified in their CMRT that they source from smelters that were not listed as conformant or were unwilling to

undergo an RMAP assessment or similar assessment from a trusted traceability project. As a result of an improvement request by Sony, 14 suppliers conducted investigations and responded that the non-compliant smelters were not in fact in their supply chains, while we continue to request improvement from the remaining 27 suppliers. Sony established 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. This point of contact allows reporting of any actions across the electronics supply chain that violate or may violate the Sony Supply Chain Code of Conduct or the Sony Group Policy for Responsible Supply Chain of Minerals. Actions taken include those connected to the environment of mining, trading, handling and export of minerals in conflict and high-risk areas. If corrective actions are necessary as a result of the investigation, we will take reasonable corrective action as appropriate.

→ [Establishing Contact Points for Suppliers and Stakeholders](#)

🔗 [Sony Group Portal Website | Grievance System for Sony Group Electronics Supply Chain](#)

## Addressing US Law on Conflict Minerals

The Democratic Republic of the Congo (DRC) and adjacent countries have been mired in conflict with armed groups perpetuating human rights abuses in that region. These armed groups have been trading in certain minerals commonly found in that region to finance their activities. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act in the United States, which first became effective in January 2013, defines the four minerals that are determined to be financing conflict in the DRC as “conflict minerals”. This law seeks to ensure transparency and reporting related to conflict minerals and requires companies whose stock is listed on a US stock exchange, as Sony's is, to conduct an inquiry into the origin of the four minerals in their supply chains. We have made annual disclosure mandatory since 2014. On May 27, 2025, Sony submitted its 2024 report on supply chain activities to the U.S. Securities and Exchange Commission (SEC). Of the 229 smelters that comply with RMAP and other standards

identified in a survey conducted in 2024, 151 source from the DRC. While it was not possible to confirm the country of origin for all of the four minerals in products, for those which could be identified in supplier reports, none sourced from the DRC could be considered to be contributing to conflict.\*

\* Refer to Sony's report to the SEC, which includes the smelters list confirmed through Sony's traceability program.

🔗 [Sony's report filed with the SEC \(Form SD & Conflict Minerals Report\) \[PDF: 599KB\]](#)

## Managing the Cobalt Supply Chain

Cobalt is an important mineral used in lithium-ion batteries for a wide range of products including electric vehicles and smart phones. There have been concerns about child labor and working conditions at sites where it is extracted in the DRC, a country known to have the largest reserves of cobalt in the world.

In 2016, a supplier reported that some lithium-ion battery parts procured by Sony contained cobalt produced in the DRC. In response, Sony established the Sony Group Policy for Responsible Supply Chain of Minerals in October 2017. This policy is a revision of the Sony Group Conflict Minerals Policy, which targeted the four minerals. In addition to the four minerals, Sony has recognized cobalt as another high-risk mineral and launched efforts to build a responsible cobalt supply chain. Since then, Sony has continued to manage its cobalt supply chain using industry standard tools, such as the Extended Mineral Reporting Template (EMRT) developed by RMI, and by carrying out further third-party RMAP audits of cobalt refineries.

In fiscal year 2023, Sony conducted EMRT based surveys of 9 lithium-ion battery suppliers. Within these, we identified 23 cobalt refineries in the supply chain, and confirmed that all were RMAP-compliant. In fiscal year 2024, Sony conducted EMRT based surveys of seven lithium-ion battery suppliers, identifying 38 cobalt refiners in their supply chains. Of these, 37 were confirmed to be in compliance with RMAP or Cooper Mark's joint due diligence standards. We approached one refinery to encourage compliance not yet achieved (as of March 2025).

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## Multi-Stakeholder Collaboration

Sony recognizes that multi-stakeholder collaboration is the key to identifying and mitigating the adverse human rights impact that can be associated with mineral extraction in high-risk areas. Specifically, Sony continuously collaborates with various multi-stakeholder efforts such as RMI in order to participate in the development of the due diligence process and mitigate human rights risks in the supply chain.

## Industry Initiatives and the Industry Alliance

For High-Risk Minerals, Sony actively participates in and supports industry groups and alliances that identify the negative effects of mineral mining in high-risk areas, and works to mitigate or prevent these effects.

### RMI

In 2011, RBA launched the industry-leading Conflict Free Sourcing Program (CFSP, currently RMAP), then, with the aim of promoting collaboration with other industries and multiple stakeholders outside electronics, established RMI (formerly CFSI) in 2013. Sony utilizes the frameworks developed by these industry groups and alliances as part of its efforts to ensure responsible sourcing of raw materials. RMI holds workshops for discussions with NGOs, socially responsible investors, local government representatives and other stakeholders, in which Sony participates.

[☞ Responsible Minerals Initiative](#)

## Japan Electronics and Information Technology Industries Association (JEITA)

The Japan Electronics and Information Technology Industries Association (JEITA) cooperates with RBA/RMI to handle conflict mineral issues. Sony participates in JEITA's Responsible Minerals Trade Working Group.

[☞ JEITA Responsible Sourcing of Minerals](#)

### Donations

Sony donates to the following RMI and NGO-related funds.

- The Assessment Fund for RMAP Participating Smelters and Refiners:  
A fund that helps cover the costs for cobalt refineries to undergo third-party RMAP audits (donated fiscal year 2016-2019, 2021, 2023-2024)
- RMI-Pact partnership for supporting Alternative Livelihoods through a Vocational training program:  
A program in cooperation with Pact, an NGO that provides vocational support to young people in cobalt mining areas of the DRC (donated fiscal year 2020)
- Better Mining:  
A project in cooperation with the RCS Global Group that aims to improve the health, safety, human rights and other risk areas for mines in parts of the DRC where artisanal and small-scale mining takes place (donated fiscal year 2020, 2022, 2023)

[☞ RMI Member Funding](#)

[☞ Better Mining Impact Report](#)

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