

Ethics and Compliance



Overview

Basic Approach

Alignment of our Purpose & Values through ethical and responsible conduct earns trust for the Sony brand and supports Sony's value creation. With this in mind, Sony's ethics and compliance program is designed to comply with laws, manage key group-wide risks and foster an ethical corporate culture. The program is continuously improved based on both best practices and global regulatory expectations.

Sony has also adopted in-depth group-wide policies, procedures and controls for key risk areas such as antitrust, anti-corruption, and privacy and personal information management. Senior management evidences its commitment to ethical business conduct by repeatedly communicating the importance of staying true to the Code and leading by example.

Structure

Sony instituted a global ethics & compliance network to ensure effective oversight and implementation of our program by all Sony Group companies.

Looking to the Future

Sony continuously assesses its risks and engages in ongoing reviews and program improvements to maintain and elevate an ethical corporate culture. Senior management continues to allocate necessary resources to achieve Sony's goal of ethical and responsible business conduct and compliance with all applicable laws and regulations by all Sony Group personnel.

Milestones

- 2001: Established the Compliance Division in Sony Corporation (Current "Compliance & Privacy Department, Sony Group Corporation")
- 2003: Adopted the Sony Group Code of Conduct
Refresher training on the Sony Group Code of Conduct
Establishment of the Compliance Hotline (Current "Sony Ethics & Compliance Hotline") was delivered to all employees.
Establishment of the Global Compliance Network which consists of regional offices of Global Entertainment & Americas, Europe, Japan, East-Asia and Pan-Asia
- 2008: Established the Compliance Monitoring Function
- 2009: Established the Compliance Leadership Team
- 2018: Revision of Sony Group Code of Conduct

Sony's Purpose & Values

The Sony Group Code of Conduct
Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index

Global Ethics & Compliance Network

Overview

Sony's global ethics & compliance program is designed to support ethical and responsible business conduct. It is a shared endeavor among directors, management, and employees at all levels here at Sony, with each person taking ownership and responsibility for ethical business conduct and compliance with the law and in every interaction. Sony established a group-wide ethics & compliance network of experienced compliance personnel (the "Global Network") to strengthen effective implementation of the ethics & compliance program throughout Sony Group. The Global Network (i) establishes a centralized risk management framework in line with best practices; (ii) provides necessary support and guidance to compliance personnel embedded in the business; and (iii) monitors compliance with the risk management framework to provide effective oversight, address gaps between the ethics & compliance program's requirements and actual operations, and drives consistency and continuous program improvement across all Sony Group companies.

Roles

Executives in charge of Compliance:

Provide top-level leadership for the Global Network and oversee Sony's global ethics and compliance program.

The Sony Group Corporation Compliance & Privacy Department:

Designs and oversees the Global Network and Sony's group-wide ethics & compliance program with support of the Compliance Leadership Team. It also works with the Compliance Leadership Team members, local business unit leaders, and compliance members to conduct comprehensive risk assessments and implement compliance policies, procedures, and internal controls to prevent and detect unethical behavior. It provides oversight of investigations related to potential legal or policy violations.

The Compliance Leadership Team:

Assists in identifying, developing, and implementing best practices in compliance strategies and compliance-related measures. The team is comprised of the Senior Executive in charge of Compliance, all Regional Compliance Officers, the Ethics & Compliance Strategy Leaders and the Head of Compliance Monitoring.

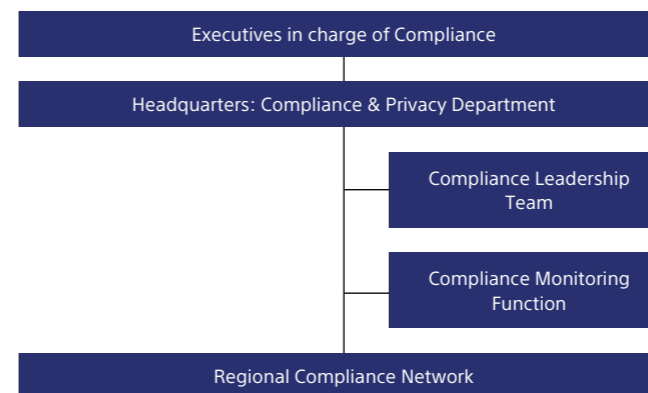
The Compliance Monitoring Function:

Helps to measure the effectiveness and maturity of Sony's global ethics & compliance program by conducting periodic and global-based assessments on program implementation and by undertaking risk-based compliance audits and validations of internal controls.

Regional Compliance Officers:

Are appointed by the Senior Vice President in charge of Compliance and are responsible for implementing and overseeing the ethics & compliance program at all Sony Group companies in their region to promote ethical and responsible business conduct and prevent and detect violations of laws, regulations, and/or company policies. Each Regional Compliance Officer must also ensure that each Sony Group company in their region has designated appropriate personnel and resources to ensure effective implementation of Sony's global ethics & compliance program.

Global Ethics & Compliance Network



Oversight by the Board of Directors and Audit Committee

The Sony Group Corporation Board of Director's Audit Committee provides oversight of Sony's program. The Audit Committee receives monthly reports as well as periodic, in-person updates concerning the ethics & compliance program's activities. Reports to the Audit Committee include information about global regulatory developments, top and emerging risks, and data used to inform program design, implementation and effectiveness such as data derived from program assessments, audit and investigation results, compliance hotline metrics, ethics culture survey results, and employee training data. It also includes information about program improvements. The Sony Group Corporation Board of Directors also receives annual updates on compliance related risks and Sony's global ethics & compliance program.

Sony's Purpose & Values

The Sony Group Code of Conduct
Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index

The Sony Group Code of Conduct

Sony's Code for Ethical and Responsible Business Conduct

The Code is the cornerstone of Sony's ethics and compliance program and applies to all Sony board members, officers and employees ("Sony Group personnel").

The Sony Group Code of Conduct shows how we should earn trust for the Sony brand through ethical and responsible conduct, in line with Sony's Purpose & Values, specifically the Value of Integrity and Sincerity. The Code provides a set of guiding principles to conduct our business activities on a principled path. Staying true to the Code helps ensure Sony's long-term success, which in turn is based on the trust of stakeholders.

Sony engages with colleagues, business partners and the communities in which Sony does business based on the Code.

Please refer to the below page for the overview of the Code.

→ [The Sony Group Code of Conduct / Approach to Sustainability](#)

The Code confirms Sony's commitment to its core ethical values in every aspect of its business operations and includes guidance on key risk areas such as:

- Accurate recordkeeping
- Anti-corruption / bribery
- Antitrust / fair competition
- Avoiding conflicts of interest
- Diversity / anti-discrimination / equal employment opportunity / fair labor and employment practice / Workplace health and safety

- Fair dealing (fair business practices)
- Privacy (e.g., data privacy of employees, customers, consumers) and cyber security
- Respect for human rights
- Financial integrity and anti-fraud
- Speaking up / no retaliation
- Tax compliance

Sony periodically updates the Code as part of its continued effort to maintain the Code's effectiveness and provide clear direction and resources to all Sony Group personnel on Sony's key risk areas and ethical principles.

Sony also recognizes its responsibility as a member of a global society. The Code reflects principles set out in relevant ethical guidelines, which include (among others):

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

Sony also actively participates in Keidanren (Japan Business Federation), an alliance of Japan's leading corporations and observes the standards in the Charter of Corporate Behavior of Keidanren. These standards are also embodied in the Code.

The Code was approved by the Sony Group Corporation Board of Directors and adopted by the decision-making bodies of every Sony Group company ("Sony Group" or "Sony Group companies") as their respective code of conduct. Sony Group managers, at all levels, are responsible for promoting the Code as part of their ongoing commitment to creating a culture of integrity and ensuring ethical and responsible business conduct. The Code, which is available on Sony's website and on each Sony Group company's intranet, has been translated into 22 languages to help ensure that it is clearly understood by Sony Group personnel and relevant third parties

working for Sony. Sony provides additional translations as necessitated by changing workforce demographics.

[🔗 Sony Group Code of Conduct \[PDF: 2.63MB\]](#)



Sony's Purpose & Values

The Sony Group Code of Conduct Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index

Sony's Ethics and Compliance Program

The Basics

Sony's ethics & compliance program starts with "Tone from the Top." Senior management continuously communicates the importance of being true to Sony's core ethical values. Their commitment is supported by a robust ethics & compliance program aligned with business processes, including ongoing risk assessments, policies and procedures, training and messaging, third party management, reporting mechanisms, and monitoring and audits. Sony continuously improves its program in accordance with regulatory guidance and other leading practices that organizations with mature ethics & compliance programs have found to be effective.

The following chart shows the key elements of our compliance program, based on regulatory guidance and leading practices.



Risk Assessment Areas under Ethics & Compliance Program

Sony conducts ongoing risk assessments to help assure that Sony's ethics and compliance program activities effectively mitigates and manages relevanttop risks. When conducting risk assessments, the Regional Compliance Officer for each region evaluates relevant compliance risks for each Sony Group company in the region in conjunction with each such company's management and compliance personnel.

Key legal and compliance risk areas assessed include:

- Antitrust
- Bribery
- Conflict of Interest
- Economic Sanctions Laws
- Environmental Laws
- Financial Laws
- Fraud
- Information Security Laws
- Infringement of Intellectual Property
- Insider Trading
- Labor and Employment Laws
- Money Laundering
- Privacy / Personal Information Protection Laws
- Product Safety / Product Compliance
- Securities Laws
- Supply Chain Laws
- Trade Compliance
- Other Laws

Policies and Procedures

Sony's global policies provide necessary rules and procedures to help ensure ethical and responsible business conduct and compliance with applicable laws and regulations. For example, Sony maintains global policies in each of the following risk areas:

- Sony Group Anti-Bribery Policy
- Sony Group Third Party Engagement Policy
- Sony Group Record Retention Policy
- Sony Group Global Policy on Antitrust / Competition Law Compliance
- Global Insider Trading Prevention Policy

These policies are regularly communicated to all Sony Group personnel and relevant third parties as appropriate. Policies are regularly reviewed to ensure that they clearly state Sony's direction on important matters, reflect current legal and business requirements, and are effectively implemented by the relevant business units.

Antitrust and Competition Law Compliance

Sony seeks to outperform competition based on the merits of its products and services, not by unfair business practices. Sony complies with all antitrust and competition laws and does its part to promote a fair and competitive marketplace. Sony has implemented the Sony Group Policy on Antitrust / Competition Law Compliance, which explains the purpose of competition laws and guides employees on compliance with such laws. Sony personnel monitor changes and developments in competition laws and maintain up-to-date controls, policies, and procedures for compliance with these laws. * Sony has also developed robust, customized training courses to raise awareness regarding competition laws and to reinforce the policy requirements.

* Sony's material legal and regulatory proceedings in FY2022 are disclosed in our Form 20-F: "Item 8. Financial Information A. Consolidated Statements and Other Financial Information. Legal Proceedings," p. 87.

Sony's Purpose & Values

The Sony Group Code of Conduct Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index

Training and Messaging

Sony adopted a “Compliance Education Protocol” to ensure that minimum ethics & compliance training and communications in critical risk areas are provided to all employees and relevant third parties working for Sony. For example, all Sony Group personnel and relevant third parties working for Sony are required to complete comprehensive Code of Conduct training and Proper Workplace Conduct training within 90 days of first providing services to Sony. Refresher comprehensive Code of Conduct training must also be completed at least every four years. In addition, in-depth training on key Code of Conduct topics must be completed at least once every two years and training on information security and privacy must be completed at least annually. Additional compliance training is mandated based upon risk assessments and employee and third-party roles and responsibilities. Key ethics & compliance training includes:

- Anti-Bribery
- Third Party Engagement
- Antitrust and Fair Competition
- Import / Export Trade Compliance
- Manager Training

Furthermore, frequent messaging concerning Code topics and key risk areas is provided to all Sony Group personnel and relevant third parties working for Sony.

Third Party Management

Sony established internal rules and procedures to help ensure compliance with applicable laws and regulations related to potential third party risks, which include: anti-corruption, anti-money laundering, economic sanctions, trade controls, tax matters, and supply chain laws related to the procurement of electronics products. These rules are designed to help assure that Sony only does business with reputable third parties.

Third Party Due Diligence

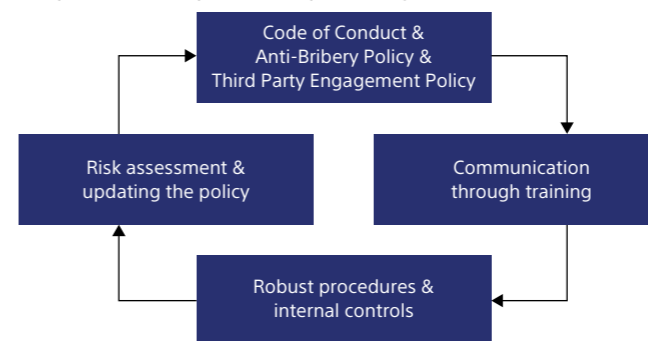
The Sony Group Third Party Engagement Policy was established to help ensure compliance with applicable laws and regulations related to potential third party risks, which include: anti-corruption, anti-money laundering, economic sanctions, trade controls, tax matters, and supply chain laws related to the procurement of electronics products. This policy describes the methodology for assessing the risk profile for higher risk transactions and includes risk-based due diligence and pre-approval requirements. Required due diligence is performed by the employees responsible for the transaction with support from legal, finance and accounting as appropriate. The results of due diligence determine whether the transaction can proceed or whether it can only proceed subject to additional safeguards. Ongoing monitoring for red flags is required and due diligence must be refreshed periodically after the commencement of the transaction. All personnel involved in third party onboarding, including relevant personnel in Sony’s finance, accounting, trade controls and legal functions are required to receive training on this policy.

Anti-Bribery and Corruption

Sony believes that corruption negatively impacts the communities and economies where we do business and that it must be eliminated to realize a sustainable, inclusive, and transparent society. One of the core principles set forth in the Code is the need to give due consideration to the impact of our business activities on the interest of our stakeholders. The Code prohibits all types of corrupt practices. Sony also adopted a global policies (“Sony Group Anti-Bribery Policy” and “Sony Group Third Party Engagement Policy”) that contains rules and procedures designed to prevent corruption involving government officials.

Sony closely monitors global anti-corruption laws and enforcement trends to ensure that Sony’s global ethics & compliance program and internal controls properly address these evolving risks.

Sony’s Anti-Bribery and Corruption Program



Policies

- The Code prohibits improper payments in every transaction, whether with a government official or with a private party.
- The Sony Group Anti-Bribery Policy provides rules and procedures designed to prevent government corruption including pre-approval rules and limitations on the amount and type of permitted expenditures.
- The Sony Group Third Party Engagement Policy provides rules and risk-based procedures, including due diligence and pre-approvals for any third party that may interact with a government official on Sony’s behalf.

Sony’s Purpose & Values

The Sony Group Code of Conduct
Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony’s Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony’s Ethics and Compliance Program

Privacy and Personal Information Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index

Communication through Training

- Sony provides extensive training and support to assist local management with policy compliance. For example, all Sony employees receive training on anti-bribery and corruption expectations as part of the Code of Conduct training upon hire. Refresher training is also provided at least every four years thereafter.
- In addition, employees who are at a higher risk for interactions with government officials (i.e., senior management, marketing, sales, procurement and any other employees identified as dealing with government officials) receive more focused anti-corruption training at least every two years and more frequently if indicated by risk assessments. This enhanced training includes training on Sony's specific policy pre-approval and due diligence requirements.
- For personnel in Sony's control functions (legal, finance, accounting, other control personnel) the above described training is supplemented by live, in-person training.

Robust Procedures & Internal Controls

- Sony has implemented robust internal controls and accounting processes designed to detect and prevent violations of company policies relating to improper payment risks and to ensure accurate books and records.
- Third parties (including intermediaries such as distributors and sub-agents) who interact with government officials on Sony's behalf, joint venture partners, parties to acquisition targets and certain investments are subject to risk based due diligence. In accordance with the due diligence procedures specified based on risk levels, including but not limited to whether the transaction involves any red flags or high risk territories that Sony specifically identifies in its policies, types of transactions and whether the transaction involves any intermediaries such as distributors and sub-agents, employees handling the transaction and professional functions such as financial department, accounting department, or the legal department in each company perform due diligence together as appropriate. Due diligence is performed periodically thereafter if the transaction is continuous in its nature. Any transacting parties (including intermediaries such as distributors and sub-agents) who pose high risks must also agree to abide by applicable anti-

corruption laws and regulations and Sony's Anti-Bribery Policy and Third Party Engagement Policy.

- Concerns are promptly investigated via the Global Network and legal department of each subsidiary. Appropriate action for the case such as disciplinary, remedial and/or corrective action is considered and implemented. Such remediation activities are monitored until completed.

Risk Assessment & Updating Policy

- Sony conducts periodic anti-corruption assessments and audits of its business to raise overall awareness, detect potential misconduct, and monitor compliance with anti-corruption laws and policy.
- Based on these assessments, Sony updated the Sony Group Anti-Bribery Policy and adopted the Sony Group Third Party Engagement Policy in 2023.

Sony continues to leverage opportunities to share both knowledge and best practices across its system.*

* Sony's material legal and regulatory proceedings in FY2022 are disclosed in our Form 20-F: "Item 8. Financial Information A. Consolidated Statements and Other Financial Information. Legal Proceedings," p. 87.

Elimination of Anti-Social Forces

Sony strongly opposes anti-social forces that threaten to disrupt the order and safety of the community. Sony will not entertain relationships with members of anti-social forces. Furthermore, Sony will not give economic benefits to, or accept illegal demands from, any anti-social force. Sony ensures that it does not do business with members of organized crime and other anti-social forces by performing due diligence procedures on its business partners and providing relevant communications to its employees.

Sony's Purpose & Values

The Sony Group Code of Conduct
Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information
Management

Customer-first Business Operations

Corporate Governance

Data Section

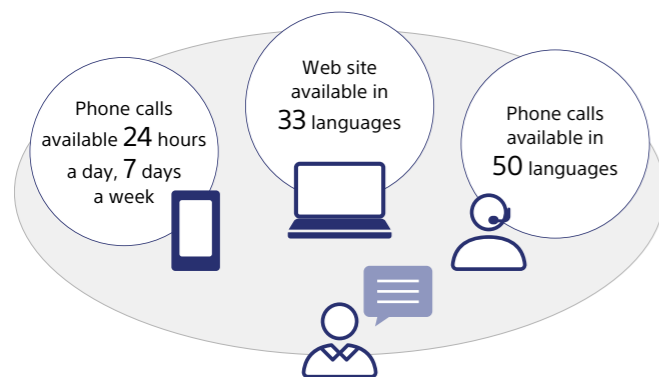
GRI Standards Content Index

Reporting Mechanism (Sony Ethics & Compliance Hotline)

Sony believes that a “speak up / listen up” culture—where employees are encouraged to raise concerns and feel confident that they can do so without fear of retaliation—is a key to early detection and prevention of ethical and regulatory problems.

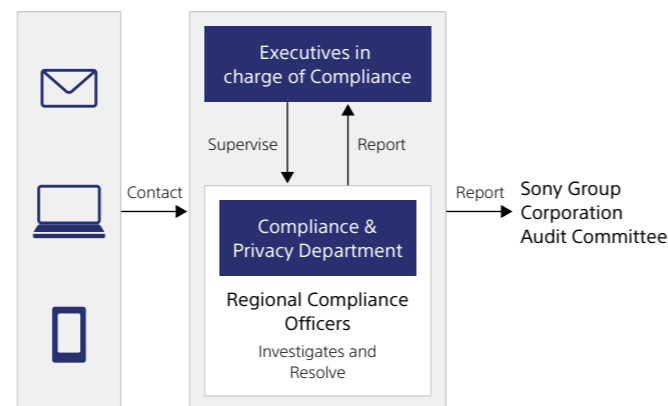
Multiple Reporting Channels

Sony provides many different types of resources to employees to enable them to raise concerns, including the Sony Group Ethics & Compliance Hotline (“Hotline”).



The Hotline is available online (in 33 different languages) or by phone, 24 hours a day, seven days a week. The phone lines are staffed by specially trained third-party representatives, with translators in up to 50 different languages. All information provided to the Hotline is handled confidentially. Calls to the Hotline are not recorded or traced, and reporters may remain anonymous to the extent permitted by law.

How Sony Operates the Hotline / How Sony Investigates Reported Matters

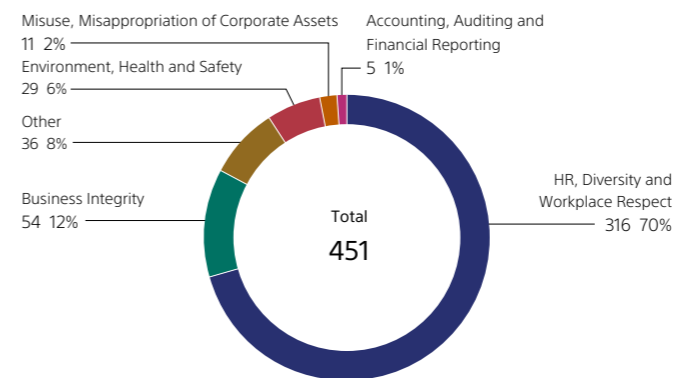


All concerns raised through the Hotline are investigated independently of ordinary internal reporting structures. Third party representatives, following the receipt of concerns, check possible conflicts of interest before providing necessary information to the appropriate Regional Compliance Office (the “Office”). The Office reviews the information and determines what initial actions are appropriate. The Office investigates the allegation (or ask appropriate department to investigate the allegation) under the oversight of the Regional Compliance Officer, collect more information, or take other actions as appropriate. The Office also works with legal and/or other subject matter experts to determine how best to investigate and resolve the allegations. Management will take corrective action to improve business operating systems or take disciplinary action against employees who have violated the law or company policy, when the facts warrant doing so. Each Regional Compliance Officer reviews all reports and responses in their region, as an added check to help assure matters are fully and fairly addressed. The status of raised concerns is also reported monthly to the Sony Group Corporation Compliance & Privacy Department, which, in turn provides a report to the Sony Group Corporation Audit Committee.

In FY2022, the Hotline received 451 concerns. The pie chart below shows the total number of concerns received in FY2022 by category. 70% of raised concerns was related to employees, diversity, and

workplace. 12% was related to business integrity.

FY2022 Reported Concerns by category



Notes: The figures in percentages are rounded to the nearest whole number wherefore the total does not sum up to one hundred percent.

In FY2022, 53 concerns were substantiated and remediated as appropriate. The remainder includes cases which were unsubstantiated, and cases under investigation, among others.

- Sony's Purpose & Values
- The Sony Group Code of Conduct Approach to Sustainability
- At a Glance 2022
- Editorial Policy
- Business Overview
- Sony's Sustainability
- Materiality
- Environment
- Technology
- Employees
- Respect for Human Rights
- Responsible Supply Chain
- Quality and Customer Service
- Community Engagement
- Ethics and Compliance**
 - Overview
 - Global Ethics & Compliance Network
 - The Sony Group Code of Conduct
 - Sony's Ethics and Compliance Program
 - Privacy and Personal Information Management
 - Customer-first Business Operations
- Corporate Governance
- Data Section
- GRI Standards Content Index

The table below are examples of issues raised through our Hotline, including information about how these issues were addressed.

FY2022 Hotline Cases

Issue(s) Raised	Guidance	Action(s) Taken
An employee helped the employee's friend purchase a Sony product at a discounted price without authorization.	The Sony Group Code of Conduct requires that Sony's assets are to be used only for legitimate business purposes and we must not pursue personal benefits using Sony's assets.	The employee admitted the allegations during the investigation. The company required the employee to reimburse the company for the loss. The employee reimbursed and is no longer employed by Sony. The company reminded its team members about the requirements of internal control processes and policies, and strengthened control and management to the operation.
A supervisor instructed a subordinate to change the way they dress, referring to their clothing in a demeaning way.	Sony will not tolerate any form of discrimination, or harassment including, bullying or other behaviors that create a hostile work environment under the Sony Group Code of Conduct.	An investigation confirmed the concern. The supervisor was given a written warning. The supervisor was also provided support to help them better express themselves to employees as part of the remediation.
Employees were conducting their own personal business during overtime hours.	Sony Group Code of Conduct requires that employees must always act in Sony's best interests.	The investigation confirmed that some of the time and attendance records were found to be inadequate. The employees were subjected to disciplinary action.

How Sony Promotes Speak-Up Resources

Sony continuously promotes both the need to raise concerns as well as the various resources available for employees to raise their concerns. The Code clearly states that every employee is responsible for speaking up to protect their colleagues and Sony. Code of Conduct training and ongoing messages also promote the importance of reporting concerns and advise employees that their concerns can be directed to either their manager, human resources personnel, legal and compliance personnel, or the Sony Ethics & Compliance Hotline. Since Sony understands that employees may prefer to raise concerns with their manager in the first instance, training is also provided to all managers on how to create an environment where employees feel comfortable speaking up when they observe unethical behavior. This training instructs managers on how to handle concerns and prevent any appearance of retaliation.

No Retaliation

Sony strictly prohibits retaliation in any form. The Code and other internal rules explicitly provide that Sony does not tolerate any form of retaliation against anyone for making a good faith report or for cooperating in an investigation of a report. Sony keeps information provided to the Hotline confidential to the extent possible. Sony promotes its policy against retaliation in trainings and communications to all Sony Group personnel and imposes appropriate consequences in the event anyone is found to have engaged in retaliatory behavior.

Monitoring / Audit

Sony has multiple mechanisms to measure the effectiveness and maturity of Sony's global ethics & compliance program. These mechanisms include: conducting reviews of program implementation on a global basis and using advanced analytics on data from various sources such as hotline and ethical culture survey results, third party benchmark information and audit/review results. Sony also conducts risk-based compliance reviews, audits and validations of controls.

Compliance Program Review

Sony's Compliance Monitoring function is focused on monitoring Sony's ethics and compliance program. One of its key monitoring activities is conducting periodic Compliance Program Reviews. The Compliance Program Review is a collaborative, educational, automated, and real-time process designed to confirm the status of program implementation at Sony Group companies in coordination with each of the compliance personnel. For each finding/gap identified through the review process, action plans are developed, and the remediation progress is monitored.

Sony intends to continue conducting periodic reviews to ensure continuous compliance program improvement.

Ethical Culture Survey

Sony periodically conducts an anonymous global survey containing detailed perceptions of Sony's ethical culture. The survey is designed to measure ethical culture and compliance program effectiveness. Each Regional Compliance Officer works with Sony group companies in their region to analyze survey results and to take appropriate actions to improve ethical culture and compliance program effectiveness. The results of the FY2022 survey showed improvement in key areas of focus based on the prior survey results.

Sony's Purpose & Values

The Sony Group Code of Conduct
Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information
Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index

Privacy and Personal Information Management

Sony believes it is important to protect the personal information of Sony's customers, employees and other stakeholders and thus ensure trust.

Sony has entered a new digital age, where the global privacy landscape and advancements in information and communication technology are changing at a faster pace than ever before. New global privacy laws continue to emerge, raising the bar for privacy compliance across the world. Rapidly evolving cloud-based solutions, social media platforms, Big Data and transformative technologies such as AI, means Sony faces new privacy challenges and risks every day.

To be able to respond to these changes and to ensure Sony continues to earn stakeholders' trust, Sony maintains a robust global privacy program. Sony's approach to privacy continues to be grounded in a group-wide governance structure that enables the effective management of potential risks and incorporates privacy controls into business processes, systems and products to safeguard the personal information of Sony customers, employees and other stakeholders.

Privacy Governance

Led by Sony Group Corporation's Senior Vice President responsible for Legal, Compliance & Privacy, Sony has a governance structure of privacy and personal information management that covers the entire Sony Group. Sony's privacy management is governed by a set of global policies and standards, which are based on applicable laws, principles and best practices. These policies set forth Sony's group-wide commitment to privacy and define practices and procedures to be followed by Sony executives and employees to ensure appropriate handling and protection of the personal information that Sony collects, stores and/or processes.

Sony routinely reviews and revises these policies and standards to address changes in the risk landscape, and the regulatory environment. For example, Sony recently introduced a set of Ethical Privacy Principles via its global privacy management framework which are designed to ensure trust with our customers, employees and other stakeholders through the proper and ethical handling of personal information.

Sony Group Corporation's Senior Vice President responsible for Legal, Compliance & Privacy monitors the global implementation of and compliance with those policies. Sony has a Compliance Monitoring program in place to periodically assess the Group's compliance with Sony's overarching privacy management framework and to proactively identify and manage potential privacy risks.

Under the direction of Sony Group Corporation's Senior Vice President responsible for Legal, Compliance & Privacy, the Sony Group Corporation Privacy Section, Privacy Officers and legal departments responsible for privacy and personal information management at Sony Group companies work together and ensure effective implementation of policies and standards. Sony has established a Privacy Leadership Team consisting of privacy leaders from across Sony. This team is responsible for advising on and supporting Sony Group Corporation's Senior Vice President responsible for Legal, Compliance & Privacy, with setting privacy strategy and direction. Strong executive support for, and governance of privacy are essential. Accordingly, executives at Sony headquarter and each Sony Group company take responsibility for playing an active role in managing privacy risks within their organizations and instilling a culture that respects privacy and builds trust.

Safeguarding Privacy and Personal Information

Sony continues to enhance protection of personal information by evaluating and addressing privacy risks through the use of a global privacy management framework that promotes the integration of privacy principles and requirements into Sony's data

processing activities.

To maintain the stakeholders' trust, Sony continuously looks for ways to improve practices, implement stronger controls, and provide more robust security to protect personal information and other information entrusted to its care.

Employee Training

Sony believes every employee has a role to play in safeguarding privacy. To increase the education and awareness of our workforce, Sony requires all employees to receive information security and privacy training. In addition, Sony provides privacy specialist personnel with bi-annual training and awareness on new privacy requirements and hot topics, as well as occasional training and awareness through privacy working groups and group-wide projects.

Sony's Purpose & Values

The Sony Group Code of Conduct Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index

Customer-first Business Operations

Sony Financial Group is in charge of Sony's financial services business and pursues business operations from a customer-oriented perspective throughout. As a financial holding company, Sony Financial Group Inc. has clarified this initiative as its customer-first business operation policy and, as subsidiaries, Sony Life Insurance Co., Ltd., Sony Assurance Inc. and Sony Bank Inc. each go further to establish business operation policies fine-tuned to their respective activities. These policies are reviewed periodically to respond to factors such as changes in the business environment, and the progress of their initiatives is reported regularly to the respective companies' boards of directors or relevant senior managements and disclosed on their websites.

“Customer-first Business Operation Policy” and Relevant Initiatives

[Sony Financial Group Inc.](#)

[Sony Life Insurance Co., Ltd. \(in Japanese\)](#)

[Sony Assurance Inc. \(in Japanese\)](#)

[Sony Bank Inc.](#)

[\[Customer-first Business Operation Policy\] Performance of Fiscal 2022 Initiatives \(in Japanese\)](#)

Sony's Purpose & Values

The Sony Group Code of Conduct
Approach to Sustainability

At a Glance 2022

Editorial Policy

Business Overview

Sony's Sustainability

Materiality

Environment

Technology

Employees

Respect for Human Rights

Responsible Supply Chain

Quality and Customer Service

Community Engagement

Ethics and Compliance

Overview

Global Ethics & Compliance Network

The Sony Group Code of Conduct

Sony's Ethics and Compliance Program

Privacy and Personal Information
Management

Customer-first Business Operations

Corporate Governance

Data Section

GRI Standards Content Index