

# Respect for Human Rights



## 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. In fiscal year 2023, 2024, Sony newly established the Sony Group Human Rights Policy for further promotion of human rights efforts in Sony.

### Structure

The Sustainability Department at Sony Group Corporation is supervised by the Senior Executive in charge of Sustainability. The Department assesses human rights impact throughout Sony Group's business activities and value chains in collaboration with relevant headquarters departments such as Human Resources or Procurement and the relevant department in each business area and promotes efforts to prevent or mitigate of the potential adverse impact on human rights. In fiscal year 2023, the working group, which consists of the Sustainability, Legal and Compliance departments continuously discuss possible actions based on the results of the human rights risk impact assessments and the development of relevant regulations. Sony also established the Diversity Promotion Council, chaired by the Senior Executive in charge of Human Resources and General Affairs, with members drawn from related departments at Headquarters. The Council provides support for group-wide initiatives to raise awareness of human rights and promote diversity.

## Looking to the Future

Sony aims to conduct human rights due diligence on an ongoing basis under the Sony Group Human Rights Policy. For issues where significant adverse human rights impact are identified or of concern, Sony actively promotes initiatives to prevent or mitigate those issues, monitors the initiatives' effectiveness and considers enhancements to these initiatives, as appropriate.

### 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 risk impact assessments
- 2018: Sony Group Code of Conduct revised  
Sony Group AI Ethical Guidelines established  
Human rights risk impact assessments updated
- 2019: Sony Group AI Ethics Committee established
- 2020: Human rights risk impact assessments updated
- 2021: Working group to implement human rights due diligence established
- 2023: Human rights risk impact assessments updated
- 2024: Sony Group Human Rights Policy established

Sony Group Portal Site :

- [Sony Group Code of Conduct \(Revised as of April 1, 2024\) \[PDF:2.85MB\]](#)
- [Sony Group Human Rights Policy \(Established as of March 29, 2024\) \[PDF:181KB\]](#)
- [Sony Group AI Ethics Guidelines \[PDF: 103 KB\]](#)
- [Statement on Modern Slavery Act](#)

- Sony's Purpose & Values
- The Sony Group Code of Conduct
- Sony's Basic Policy for Sustainability Initiatives
- Sony's Sustainability Vision
- At a Glance 2023
- Editorial Policy / Business Overview
- Sony's Sustainability
- Materiality
- Employees
- Occupational Health & Safety
- Respect for Human Rights**
  - Overview
  - Human Rights Due Diligence
- Responsible AI
- Accessibility
- Quality and Customer Service
- Responsible Supply Chain
- Community Engagement
- Environment
- Technology
- Ethics and Compliance
- Corporate Governance
- Sustainability Information

# 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. In March 2024, Sony has newly established the Sony Group Human Rights Policy. Sony conducts human rights risk impact assessments and 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 (UNGP) 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 risk 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 risk 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

that are highly relevant to Sony's business activities. In 2023, Sony once again conducted a human rights risk impact assessment in partnership with BSR, including multiple external stakeholder engagements and confirmed that the three areas of potential human rights risk that were previously identified as most relevant to Sony's business activities remained the same.

\* BSR is an independent, global, non-profit organization devoted to building a just and sustainable world.

## Identifying Priority Areas

The human rights risk impact assessments carried out in 2020 and 2023 identified the following as potential human rights risk areas that are highly relevant to Sony's business activities:

- 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 abuse

Based on the above assessments, Sony Group has prioritized its action in the following Priority Areas: (1) a 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 requested to comply with the Sony Supply Chain Code of Conduct. They are also requested to carry out risk assessments, be subject to regular monitoring regarding compliance with the Supply Chain Code of Conduct, and implement any necessary improvements based on

the results of the monitoring.

\* RBA is an alliance dedicated to supply chain responsibility encompassing human rights, labor conditions, health and safety, and the environment

→ [Responsible Supply Chain](#)

### Respect for Diversity

Sony is committed to creating a workplace that respects human rights and provides equal employment opportunities and strives to create a place where everyone belongs and demonstrates their individuality, inspiring an inclusive society. 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.

→ [Employees](#)

🔗 [Sony Group Portal Site: Diversity, Equity and Inclusion Statement](#)

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.

→ [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.

→ [Accessibility](#)

🔗 [Sony Group Portal Site: 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

Sony's Purpose & Values

The Sony Group Code of Conduct

Sony's Basic Policy for Sustainability Initiatives

Sony's Sustainability Vision

At a Glance 2023

Editorial Policy / Business Overview

Sony's Sustainability

Materiality

Employees

Occupational Health & Safety

Respect for Human Rights

Overview

Human Rights Due Diligence

Responsible AI

Accessibility

Quality and Customer Service

Responsible Supply Chain

Community Engagement

Environment

Technology

Ethics and Compliance

Corporate Governance

Sustainability Information

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 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.

Authentic storytelling is a key driver in Sony Pictures Entertainment's (SPE) business, including studio produced content and social impact strategies. In order to increase positive representation onscreen, behind the camera, and at the studio, SPE collaborates with global organizations across various diverse disciplines including the Geena Davis Institute on Gender in Media, Easterseals Disability Film Challenge, Social Justice Now Film Festival, Respect Ability and the Gay & Lesbian Alliance Against Defamation.

## 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,

→ [Responsible AI](#)

🔗 [Sony Group Portal Site: Responsible AI](#)

## 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 other internal rules. Sony also has a contact point that offers consultation on equal opportunity-related issues and support for work-life balance even in cases where no regulation or law has been violated. These hotlines equip Sony to respond quickly and appropriately, while giving full consideration to personal privacy. Sony strictly enforces confidentiality and ensures that reporters are not subject to reprisal for reporting or using these services.

### 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.

→ [Sony's Ethics and Compliance Program](#)

### 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 Portal Site: Supplier Hotline \(in Japanese\)](#)

### Grievance System for Sony Group Electronics Supply Chain

Sony has established a grievance system 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.

🔗 [Sony Group Portal Site: Grievance System for Sony Group Electronics Supply Chain](#)

### EEO (Equal Employee Opportunity) Hotlines

Sony Group companies in Japan have established a hotline for equal opportunity. The hotline is available for all Sony Group employees in Japan to discuss a wide range of equal opportunity-related issues, such as harassment and support for work-life balance. In addition, Sony Group companies in Japan have also established a hotline specializing in cases to provide employee counseling by third parties with expertise on issues that employees are reluctant to raise within the company.

## Stakeholder Dialogue

Sony maintains local and international dialogue with investors and partners such as NGOs in addition to publicizing its efforts through its Sustainability Report and Sustainability Briefing. This dialogue helps Sony to understand stakeholders' expectations and leads to better human rights initiatives.

## 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

Sony's Purpose & Values

The Sony Group Code of Conduct

Sony's Basic Policy for Sustainability Initiatives

Sony's Sustainability Vision

At a Glance 2023

Editorial Policy / Business Overview

Sony's Sustainability

Materiality

Employees

Occupational Health & Safety

Respect for Human Rights

Overview

Human Rights Due Diligence

Responsible AI

Accessibility

Quality and Customer Service

Responsible Supply Chain

Community Engagement

Environment

Technology

Ethics and Compliance

Corporate Governance

Sustainability Information

the protection of human rights is provided to all employees of Sony Group Corporation as well as many Sony Group companies. In fiscal year 2023, 95% of eligible employees took the e-learning course.

## Raising Employee Awareness of Human Rights

### Sony Group Companies in Japan

Each company has its diversity promotion officer and personnel in charge and implement initiatives related to human rights, diversity, and related matters. Based on the information obtained from those initiatives, the companies 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 Industrial Federation for Human Rights, Tokyo to compile information on various aspects of the subject and improve human rights literacy in Japan. Every 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. Sony Group companies outside of Japan have similar programs in place to ensure respect for human rights in the workplace.

### Sony Interactive Entertainment (SIE)

SIE provides training on its policies related to topics such as health and safety, equal opportunity employment and harassment prevention in the workplace. Additionally, SIE's DE&I and Social Justice team provides resources such as inclusive language guides, wellbeing toolkits, and other guidance materials to help employees increase their awareness and understanding of inclusive behaviors. This helps foster an inclusive workplace and a corporate culture that promotes respect for human rights at SIE.

### Sony Music Group (SMG)

SMG provides and supports trainings, policies, education, and facilitation that advances equity and inclusion in the workplace. SMG maintains a safe workplace by offering anti-harassment training, inclusive culture training, gender transitioning resource support, anti-racism and

accessibility education. These resources support the MILES\* pillars of "Equity" and "Safety" – promoting respect for human rights at SMG.

\* MILES is SMG's strategic framework that underscores our DE&I efforts and serves as a company-wide guide for developing and implementing DE&I initiatives, policies, experiences, and programs.

### Sony Pictures Entertainment (SPE):

SPE provides its personnel with training on preventing harassment in the workplace. The SPE Office of Diversity & Inclusion hosts a variety of live sessions internationally and has created an e-learning pathway that provides employees with access to a curated set of articles, videos and resources, focused on diversity, equity and inclusion concepts that promote respect for human rights at SPE.

Sony's Purpose & Values

The Sony Group Code of Conduct

Sony's Basic Policy for Sustainability Initiatives

Sony's Sustainability Vision

At a Glance 2023

Editorial Policy / Business Overview

Sony's Sustainability

Materiality

Employees

Occupational Health & Safety

Respect for Human Rights

Overview

Human Rights Due Diligence

Responsible AI

Accessibility

Quality and Customer Service

Responsible Supply Chain

Community Engagement

Environment

Technology

Ethics and Compliance

Corporate Governance

Sustainability Information