

# 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 focuses on supply chain management and responsible procurement of minerals and works with suppliers and contract manufacturers to establish a responsible supply chain 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 play 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: Sony joins the Electronic Industry Citizenship Coalition (EICC, now the Responsible Business Alliance) as a founding member
- 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 \[PDF:356KB\]](#)

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

[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.

## Sony Supply Chain

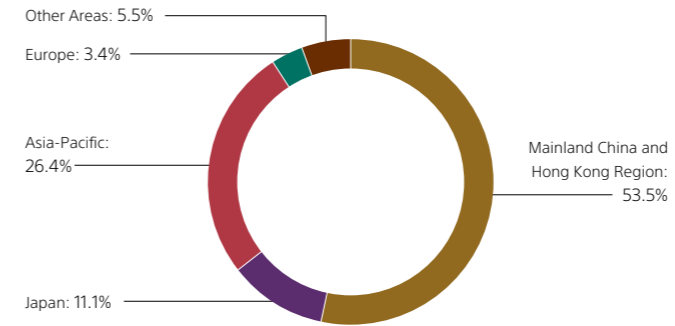
Sony develops, designs, manufactures and sells a wide range of electronics and other devices, utilizing a supply chain that stretches across the entire globe. As of August 2024, we have 12 electronics manufacturing sites in Japan, China, South Korea, Thailand, Malaysia, and the UK. Further, we procure materials and parts for Sony electronics from suppliers worldwide.

In fiscal year 2023, 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 (53.5%), Japan (11.1%), Asia-Pacific (26.4%), Europe (3.4%), and other areas (5.5%).

Electronics manufacturing sites at Sony (as of August 2024)

Location	Name of manufacturing site
Japan	Sony Global Manufacturing & Operations Corporation Sony Semiconductor Manufacturing Corporation Sony Storage Media Manufacturing Corporation Sony / Taiyo Corporation
China	Sony Precision Devices (Huizhou) Co., Ltd. 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 Europe B.V. UK Technology Centre

Raw Materials/Parts and OEM/ODM supplier ratio by geographic area (transaction value basis in FY2023)



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

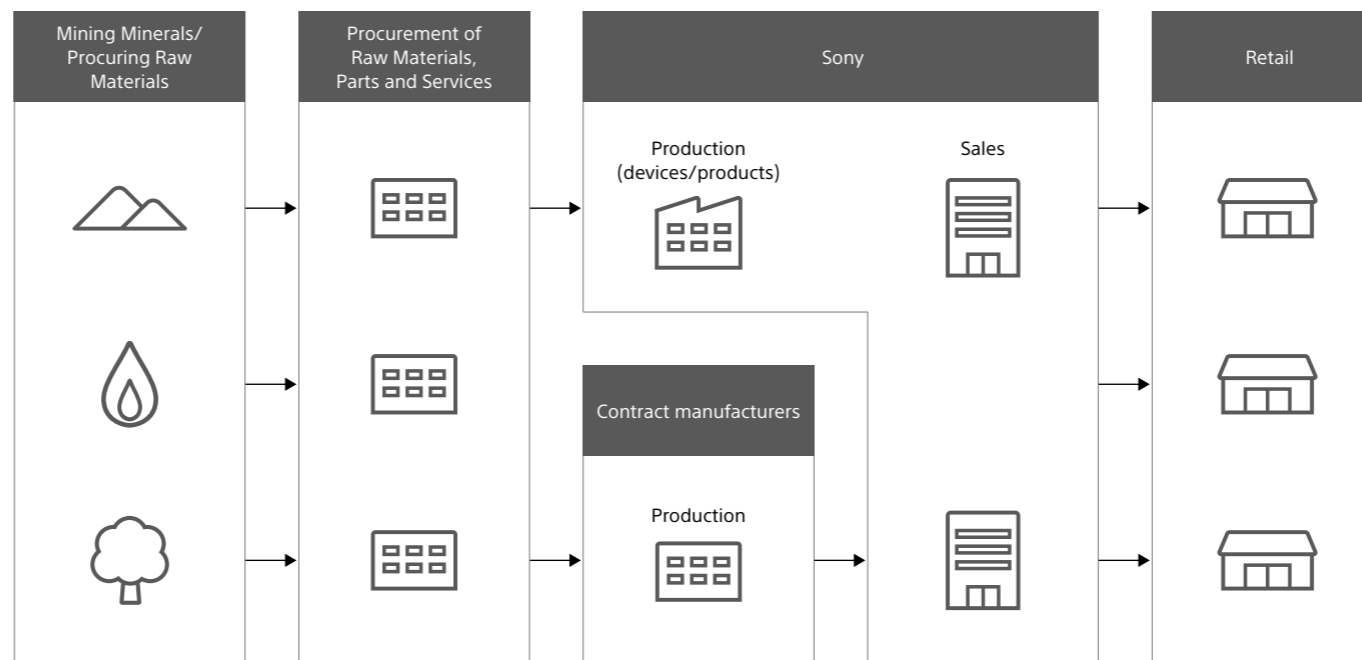
Sony recognizes the increasing importance of global companies' responsibility to manage their supply chains responsibly as diligent members of society. This extends beyond our manufacturing sites, including those of parts suppliers and contract manufacturers. Sony works with its suppliers to address 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 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, 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. 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 Sustainability \(Partnership and Participation in Multi-Stakeholder Frameworks\)](#)
- [Participation in the Responsible Business Alliance \(RBA\)](#)
- 📄 [Sony Supply Chain Code of Conduct \[PDF: 356KB\]](#)
- 📄 [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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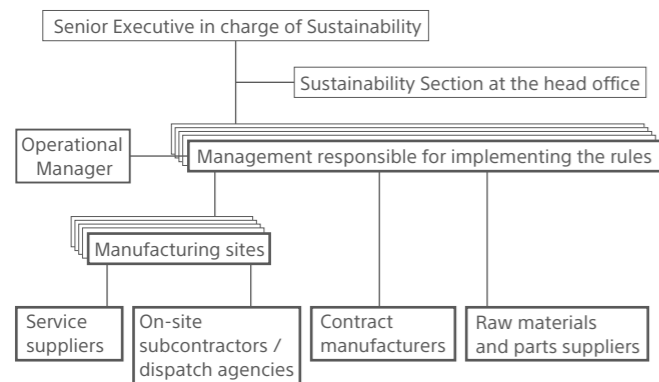
## Organizational Structure

At Sony, the Sustainability Section at the headquarters takes the lead in promoting efforts toward a responsible supply chain in cooperation with other related procurement divisions 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 Electronics Manufacturing Sites

### 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.

In fiscal year 2023, 12 manufacturing sites in Japan, China, Korea, Thailand, Malaysia and the UK, completed self-assessment surveys. The results showed that risk of noncompliance was low at all manufacturing sites.

Additionally, we regularly conduct RBA or other equivalent audit at some manufacturing sites.

### 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-assessment regarding employment status of its foreign workforce via 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 and other improvement measures. This includes establishment of new policy on freely chosen employment and recruitment fees for on-site subcontractors. In order to prevent technical interns from paying fees, we once again requested that on-site contract manufacturers comply with the Sony Supply Chain Code of Conduct, obtaining written consent 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.

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.

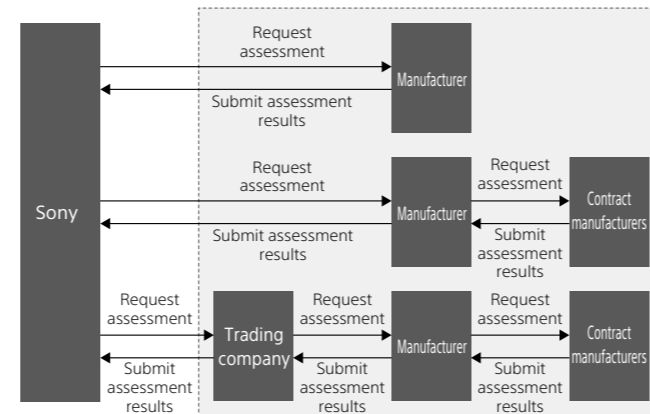
### Supplier Assessment

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.

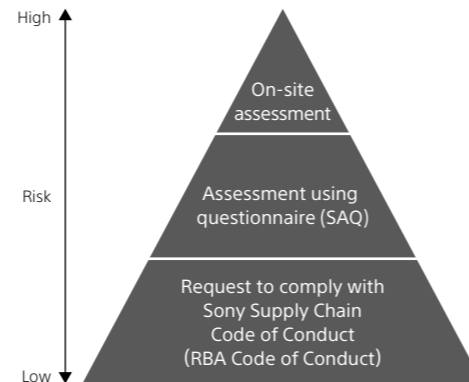
If a manufacturer is suspected to be in violation of the Sony Supply Chain Code of Conduct, instructions for improvement are issued, on-site assessments and third-party audits are conducted and employees and managers are interviewed in person to verify the actual management situation, based on the identified 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 2023

### New Suppliers

Assessment using questionnaires were conducted for 56 plants. We provided written instructions for improvement to 5 supplier plants deemed to be in minor violation. We conducted on-site assessments and third-party audits at 8 supplier plants 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

Assessment using questionnaires were conducted for 179 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 4 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	FY2021	FY2022	FY2023
Assessment using questionnaire	796	406	235
Written improvement instructions	94	75	9
Remote assessment / on-site assessment	39	64	12

### Top 5 violations identified through on-site assessment (FY2023)

Over 60 hrs. work/week	4.3%
Unable to take a day off in 7 days	3.0%
Incorrect salary deductions or social insurance premiums	2.6%
Lack of risk reduction measures or reasonable consideration for pregnant/nursing mother	2.1%
Non-compliance regarding evacuation exit access	2.1%
Insufficient management processes due to poor implementation of code of conduct	2.1%

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

### Examples of Instructions for Improvement Based on Observations from On-Site Assessments

#### ■ 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

#### ■ Reasonable consideration for nursing mother

Observation: Person who is nursing do not have a space to do so in.  
Improvement instructions: Requested to establish a nursing area and confirmation of results.

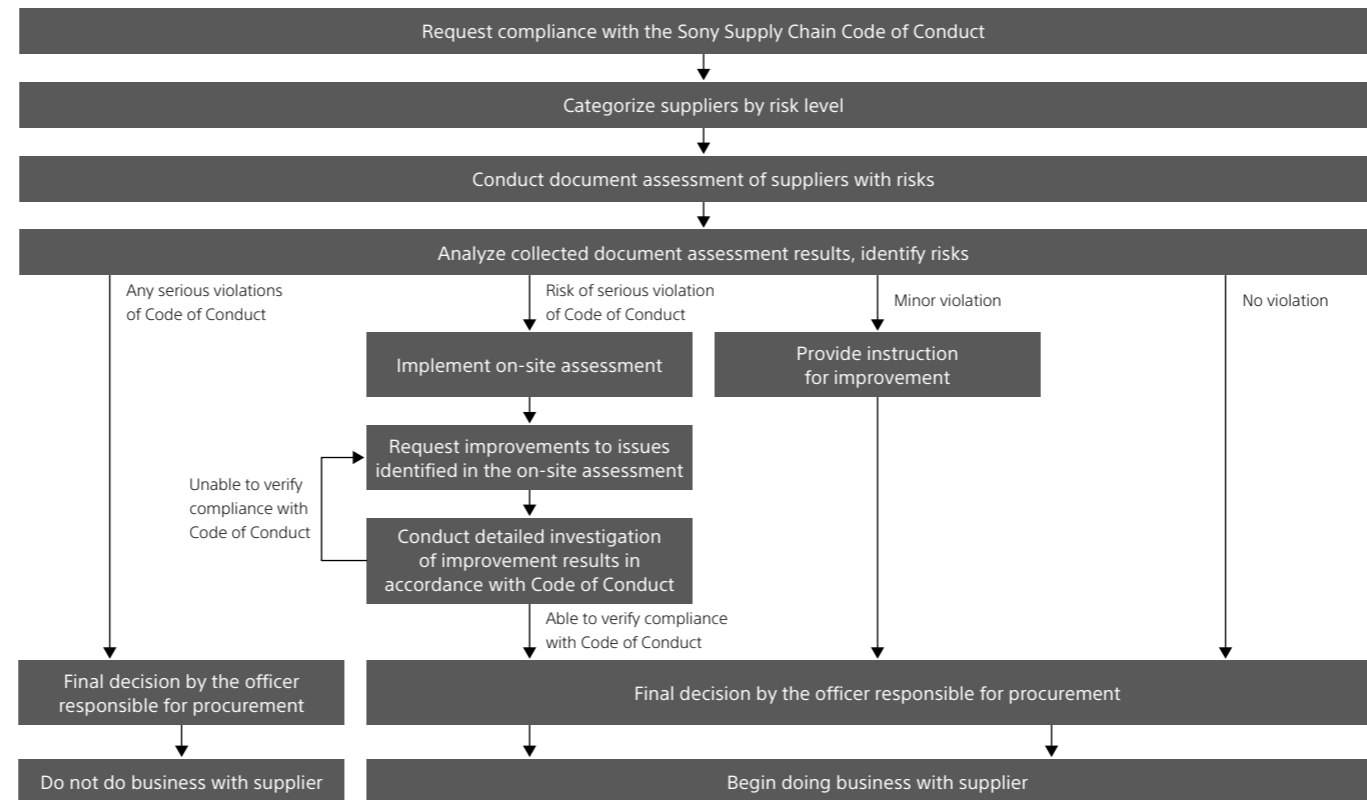
#### ■ Use of appropriate personal protective equipment

Observation: Appropriate respirators not being used in areas with volatile organic compounds.  
Improvement instructions: Requested to use appropriate protective masks and confirmation of results.

#### ■ Evacuation exit access

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

### 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 2021, we distributed a video to all our suppliers through a distribution system specifically for them. Available in Japanese, English and Chinese, the video explains what is required according to the Sony Group Code of Conduct and Sony Supply Chain Code of Conduct, and requests the establishment of management systems for compliance with the Sony Supply Chain Code of Conduct upstream of the supply chain. In fiscal year 2022, we distributed an educational video on the reduction of greenhouse gas emissions to suppliers in order to support their efforts to reduce such emissions. 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.

### 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, in fiscal year 2021, we built 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), and began implementation in fiscal year 2022. 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.

### Supplier Hotline and Grievance System

Sony has made two contact points available for supply chain issues. 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.

#### 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.

[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. This point of contact allows report 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. If corrective actions are necessary as a result of the investigation, we will take reasonable corrective action as appropriate.

[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 2022, we conducted training for all raw material and parts procurement personnel in order for them to better understand Sony Group initiatives aimed at achieving responsible supply chain. This training included explanations on the requirements stipulated by the Sony Supply Chain Code of Conduct, group environmental targets and procurement initiatives. We further worked to improve procurement personnel awareness through training that promotes communication and discussion between personnel, encouraging them to discuss ideal growth in terms of sustainability for future procurement.

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.

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## 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 electronics 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 2024, the RBA consisted of more than 230 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 had a representative on the RBA Board of Directors since 2020. 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 Sustainability \(Partnership and Participation in Multi-Stakeholder Frameworks\)](#)

[Responsible Business Alliance](#)

[RBA Board of Directors](#)

## 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.

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.

In March 2024, SIE launched its Business Principles to be applied globally to all business partners who are not subject to the Sony Supply Chain Code of Conduct. The Business Principles 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 when SIE begins doing business with all 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](#)

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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 assessment 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.

In 2023, 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 the issue of conflict minerals

### 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. These minerals, tantalum, tin, gold and tungsten (“the four minerals”) are commonly found in many products, ranging from jewelry to electronics to airplane components. 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 28, 2024, Sony submitted its 2023 report on supply chain activities to the U.S. Securities and Exchange Commission (SEC).

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

### Survey and Results on Use of the Four Minerals

The four minerals 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.

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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 2024, while the results of Sony's due diligence for the 2023 report to the SEC was not able to confirm the country of origin for all of the tin, tantalum, tungsten or gold in Sony's electronics products, the country of origin of these minerals was not identified as being from the DRC or adjacent countries. In the 2023 survey, Sony identified a total of 345 smelters and refiners as potential sources of the four minerals and, of those, 237 smelters and refiners were compliant with RMAP\*1 or were contained in the London Bullion Market Association Good Delivery List or certified by the Responsible Jewellery Council. Of these, 131 smelters and refiners were identified as sourcing from the DRC\*2.

\*1 Includes smelters under RMAP assessment.

\*2 Refer to the smelter list in the aforementioned Sony report to the SEC, which includes smelters confirmed as conflict-free through Sony's traceability program.

## 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, to ensure that products, components and materials delivered to Sony do not contain any conflict minerals, Sony expects suppliers to have pertinent policies, a due diligence framework and a

management system consistent with the OECD guidance in place. As a part of these measures, Sony is working to propel action from suppliers who have yet to establish mineral supply chain policy. This led to establishment of policy and a strengthening of the management structure among some suppliers.

## Mitigating Risk in the Supply Chain

In the event that Sony confirms that any of its products, components or materials may contain conflict 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 conflict-free sourcing policy, increased responsiveness and accuracy of the supplier survey, and increased 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 identifies non-conformant smelters and works with them to gain certification. In 2023, 69 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, 22 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 47 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 report 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.

[→ Supplier Hotline and Grievance System](#)

[↗ Grievance System for Sony Group Electronics Supply Chain](#)

## 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 2022, Sony conducted EMRT based surveys of 9 lithium-ion battery suppliers. Within these, we identified 22 cobalt refineries in the supply chain, and confirmed that all were either RMAP-compliant, or were currently conducting or preparing to conduct third-party RMAP based audits.

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 (as of March, 2024).

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## Multi-Stakeholder Cooperation

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 Audit 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)
- 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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