

Score

9.5

26

Corporate Human Rights Benchmark 2020 Company Scoresheet



Company Name SONY

Industry ICT (Supply Chain and Own Operations)

For indicators

UNGP Core Score (*) 9.5 out of 26

Out of

Score	Out of	For indicators		
Governance a	nd Policy Comm	nitments		
1	2	A.1.1 Commitment to respect human rights		
0.5	2	A.1.2 Commitment to respect the human rights of workers		
1	2	A.1.4 Commitment to engage with stakeholders		
1	2	A.1.5 Commitment to remedy		
Embedding r	espect and Hun	nan Rights Due Diligence		
Embeddin	g respect			
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions		
Human Ri	ights Due Diliger	nce (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts		
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)		
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action		
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts		
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed		
Remedies and	d Grievance Med	hanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers		
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities		
0	2	C.7 Remedying adverse impacts and incorporating lessons learned		

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: In its Code of Conduct, Sony states that 'Sony believes that all human beings should be treated with dignity and respect. Sony is committed to uphold internationally recognized human rights of all people'. [Code of Conduct, 28/12/2018: sony.net] Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not met: ILO Core: In its Code of Conduct, Sony states that 'Sony is committed to recruiting, hiring, training, promoting and otherwise treating applicants and employees without discrimination based on factors that are unrelated to Sony's legitimate business interests [] Sony will not use any form of forced or involuntary labor where people are forced to work against their will, including forced labor to work off a debt, prison labor or human trafficking. In addition, Sony will not use child labor [] Sony respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, and respects the right of workers to refrain from any such activities []. However, freedom of association and collective bargaining commitments are in force 'in accordance with the applicable laws and regulations of the countries and regions in which it operates'. Is not clear if the Company commits to respect those rights through alternative mechanisms where these rights are restricted under local law. [Code of Conduct, 28/12/2018: sony.net] Not met: UNGC principles 3-6 Not met: Explicitly list ALL four ILO for ICT suppliers: In the Company's Supply Chain Code of Conduct, Sony states that 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community.' and lists all of the fundamental ILO rights as follows: 'Freely Chosen Employment - Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used [] Young Workers - Child labor is not to be used in any stage of manufacturing [] Non-Discrimination - Participants should be committed to a workforce free of harassment and unlawful discrimination [] Freedom of Association - In conformance with local law, participants shall respect the right of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace'. [Supply Chain Code of Conduct, 01/01/2018: sony.net] • Not met: working hours for workers • Not met: Working hours for ICT suppliers: The supplier code of conduct states that 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no clear evidence that a regular work week should not exceed 48 hours was found (or requirement to follow international standards in relation to working hours). [Supply Chain Code of Conduct, 01/01/2018; sony net]
A.1.4	Commitment to engage with stakeholders	1	relation to working hours). [Supply Chain Code of Conduct, 01/01/2018: sony.net] The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to stakeholder engagement: The Company states that 'Sony remains committed to strengthening our sustainability initiatives and engaging in ongoing dialogue with our stakeholders as we contribute towards building a more sustainable world'. Furthermore, 'For Sony, engaging and working together with various stakeholders is vital for pursuing CSR activities. Sony not only promotes engagement with stakeholders in implementing its CSR activities but also participates in multistakeholder efforts to forge a global framework for social responsibility'. In the section "Stakeholder Engagement", the Company lists its stakeholders, which are: Customers, Shareholders, Business Partners, Employees, Local Communities, Global environment and NGOs, NPOs and other organizations. [Sustainability Report, 28/10/2019: sony.net] Score 2 • Not met: Commits to engage stakeholders in design: In its Sustainability Report, Sony states that the Company conducted a study to specify material topics, in which they consulted NGOs, investors, ESG rating agencies and others in order to incorporate Sony's stakeholders perspective into consideration when designing the Company's approach to HR related issues. However, it is not clear whether affected stakeholders and/or their representatives are included in a commitment to engage in Human rights approach development or monitoring (or evidence of regularly doing so). [Sustainability Report, 28/10/2019: sony.net] • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to remedy: Sony states that 'We will all use reasonable efforts to avoid causing or contributing to adverse human rights impacts that may arise from our operations, products, services and/or business relationships and will act diligently to help remediate any impacts that may occur' [Code of Conduct, 28/12/2018: sony.net] Score 2 • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not met: Commits to ILO core conventions: See indicator A.1.2. In order to be awarded, the Company needs to either sign the Global Compact or commit to the ILO Declaration (or explicitly to each ILO core area) Met: Senior responsibility for HR: The Company states that 'Sony's CSR Department assesses and monitors human rights risks throughout Sony's operations and supply chains.' Furthermore, it is indicated that one Executive VP is responsible for CSR (Shiro Kambe). [Sustainability Report, 28/10/2019: sony.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Day-to-day responsibility: In addition, the Company indicates: 'The CSR Section at Sony headquarters, which is supervised by the Corporate Executive Officer in Charge of CSR, assesses and monitors human rights risks throughout Sony Group's business activities and supply chains. The human rights of employees are addressed by a diversity committee at each Sony Group company in Japan. These committees conduct workshops on human rights and diversity. Sony has also established systems and mechanisms for employees seeking consultation on human rights issues and risks in order to ensure a quick response when problems arise.' [Sustainability Report, 28/10/2019: sony.net] • Met: Day-to-day responsibility for ICT in supply chain: As indicated above, the Company reports: 'The CSR Section at Sony headquarters, which is supervised by the Corporate Executive officer in Charge of CSR, assesses and monitors human rights risks throughout Sony Group's business activities and supply chains'. [Sustainability Report, 28/10/2019: sony.net]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Identifying risks in own operations: The Company states that 'Sony's CSR Department assesses and monitors human rights risks throughout Sony's operations and supply chains. In 2012, Sony engaged BSR, an independent, non-profit, global organization devoted to building a just and sustainable world, to conduct an initial analysis of potential human rights risks across Sony's various business operations and supply chains, which include electronics, entertainment and finance, as the salient human rights issues vary depending on the business segment. The initial BSR assessment identified potential human rights considerations in the electronics business supply chain, including materials procurement [] In 2018, Sony reviewed and updated its analysis of human rights risks with BSR, so as to reflect the current state of global affairs, stakeholder concerns, evolving human rights laws and changes in Sony's business activities.' [Sustainability Report, 28/10/2019: sony.net] • Met: Identifying risks in ICT suppliers: See above Score 2 • Not met: Ongoing global risk identification • Not met: In consultation with HR experts: See above, work carried out with BSR • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Salient risk assessment (and context): The Company states that 'Sony's CSR Department assesses and monitors human rights risks throughout Sony's operations and supply chains. In 2012, Sony engaged BSR [] to conduct an initial analysis of potential human rights risks across Sony's various business operations and supply chains []. The initial BSR assessment identified potential human rights considerations in the electronics business supply chain, including materials procurement'. Furthermore, 'In 2018, Sony reviewed and updated its analysis of human rights risks with BSR, so as to reflect the current state of global affairs, stakeholder concerns, evolving human rights laws and changes in Sony's business activities. Sony referenced the Universal Declaration of Human Rights and international treaties on human rights to identify issues that are relevant to its business activities, and reviewed media and NGO reports to identify the human rights risks for these issues. These were compared against Sony's areas of business to identify underlying risks with the greatest relevance to Sony. As a result, human rights risks related to workers in the electronics industry supply chain, which has been a key focus of Sony's efforts, and to new technologies such as Al, were identified. Sony will continue to monitor and address its human rights risks across our operations.' [Sustainability Report, 28/10/2019: sony.net] • Met: Public disclosure of salient risks: As mentioned above, the Company states that materials procurement and human rights risks related to workers in the electronics industry supply chain and to new technologies such as Al are the key risks. [Sustainability Report, 28/10/2019: sony.net] • Met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Action Plans to mitigate risks: The Company states that 'Sony will continue to monitor and address its human rights risks across our operations.' However, no clear evidence regarding this actions was found. [Sustainability Report, 28/10/2019: sony.net] Not met: Including in ICT supply chain Not met: Example of Actions decided Score 2 Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not met: Comms plan re identifying risks Met: Comms plan re assessing risks: See indicator B.2.2 Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in at least B.2.1, B.2.3 Score 2 Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company states that 'Sony has an open reporting program and 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 27 different languages) or by phone, 24 hours a day, seven days a week'. [Sustainability Report, 28/10/2019: sony.net] Score 2 • Not met: Number grievances filed, addressed or resolved: Sony states that 'In FY 2018, the Hotline received approximately 400 reports covering issues primarily relating to employment, labor, work environment and information management. Approximately 69% of the reports raised issues related to employees, diversity and workplace respect. All issues raised through the Hotline are promptly reviewed for investigation and, if supported by the findings, disciplinary or corrective action is taken. 38% of reports received in FY 2018 were substantiated and many resulted in remediation.' However, it is not clear how many human rights related complaints were received, addressed and closed during the year. [Sustainability Report, 28/10/2019: sony.net] • Met: Channel is available in all appropriate languages: See above • Met: Expect ICT supplier to have equivalent grievance systems: In its supplier code of conduct, the Company indicates that 'The management system should contain the following elements: [] Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement'. [Supply Chain Code of Conduct, 01/01/2018: sony.net]
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Grievance mechanism for community: The Company details the main communication methods for each of its stakeholders. However, there is no evidence of a mechanism designed for external raise of HR complaints. [Sustainability Report, 28/10/2019: sony.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		Score 2 • Not met: Describes accessibility and local languages • Not met: Expects ICT supplier to have community grievance systems: Sony states that 'Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' However, there is no clear evidence that this mechanism is available to suppliers' external stakeholders. [Sony Group Policy for Responsible Supply Chain of Minerals, 26/10/2017]
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Describes how remedy has been provided: Sony states that 'In FY 2018, the Hotline received approximately 400 reports covering issues primarily relating to employment, labor, work environment and information management. Approximately 69% of the reports raised issues related to employees, diversity and workplace respect. All issues raised through the Hotline are promptly reviewed for investigation and, if supported by the findings, disciplinary or corrective action is taken. 38% of reports received in FY 2018 were substantiated and many resulted in remediation. Sony provides information about its reporting statistics to senior management and the Audit Committee of Sony Corporation to help assure effective oversight.'. However, no clear evidence describing how remedy has been provided to victims was found. [Sustainability Report, 28/10/2019: sony.net] Not met: Says how it would remedy key sector risks Score 2 Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		Headline: Amazon, GE, Sony, and African Gold Refinery linked to conflict gold mined in Congo Area: forced labour Story: Reports allege that the African Gold Refinery (AGR) located in Uganda processed gold smuggled from the conflict-affected eastern Congo. The AGR then exported the conflict gold to customers in the United States and Europe, potentially including Amazon, General Electric and Sony (among other potentially affected companies not enumerated). Numerous sources including major gold smugglers and traffickers stated that they moved gold from eastern Congo to the AGR facility. "AGR denies having received gold from these traders and denies that it has otherwise received significant amounts of undocumented gold from other sources." Sources: [The Sentry - 10/2018: thesentry.org]
E(1).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Public response available Score 2 Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised: The Code of Conduct includes policy on forced labour. [Code of Conduct, 28/12/2018: sony.net] • Met: Policies apply to the type of business relationships involved: The Supply Chain Code of Conduct includes similar policy for suppliers. [Supply Chain Code of Conduct, 01/01/2018: sony.net] Score 2 • Met: Policies address the specific rights in question: The Supply Chain Code of Conduct includes specific mechanisms to prevent forced labour. [Supply Chain Code of Conduct, 01/01/2018: sony.net]
E(1).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Engages with affected stakeholders Not met: Provides remedies to affected stakeholders Not met: Has reviewed management systems to prevent recurrence Score 2 Not met: Remedies are satisfactory to the victims Not met: Has improved systems and engaged affected stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).0	Serious allegation No 2	Score (out of 2)	 Explanation Headline: Apple, LG Chem, and others criticized for inadequate screening of cobalt tainted with child labor Area: child labour Story: In a January 2016 report, Amnesty International released reports of the dangerous conditions artisanal miners face at copper-cobalt mines in the Katanga region of Congo. Additionally, "UNICEF estimates that there are approximately 40,000 children working in mines across southern DRC, and Amnesty claims that at least 80 miners died underground in southern DRC between September 2014 and December 2015." Amenesty's report indicated that the majority of the Katanga cobalt was purchased by Congo DongFang International Mining, a "subsidiary of Huayou Cobalt which supplies some of the world's largest battery makers, which, in-turn, supply companies such as Apple, LG Chem, Samsung and others." Other suppliers of cobalt include Glencore and Umicore. Other companies purchasing cobalt from suppliers include Sony, Alphabet, Dell, Tesla, Microsoft, Huawei, BMW Group, Daimler AG, L&F Co., Fiat-Chrysler Automobiles NV, General Motors, Renault Group. Sources: [Mining Technology - 02/04/2017: mining-technology.com] [The
			Register - 16/12/2019: theregister.co.uk][Amnesty International - 15/11/2017: amnesty.org]
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public response available: In its response to Amnesty International, the Company indicated that it performed due diligence to identify smelters. [Company responses to Amnesty International, 15/11/2017: amnesty.org] Score 2 • Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised: The Code of Conduct includes policy against Child Labour. [Code of Conduct, 28/12/2018: sony.net] • Met: Policies apply to the type of business relationships involved: The Supply Chain Code of Conduct also contains policy against Child Labour. [Supply Chain Code of Conduct, 01/01/2018: sony.net] Score 2 • Not met: Policies address the specific rights in question: the Company does not mention verifying the age of job applicants and requiring existence of remediation programs in case child labour is found.
E(2).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Engages with affected stakeholders: According to Sony's response to Amnesty, they state that it supported an independent academic research whose aim is to provide rigorous empirical data on household engaged in artisanal mining including children and community leaders. [Company responses to Amnesty International, 15/11/2017: amnesty.org] • Not met: Provides remedies to affected stakeholders: There is no evidence of remedy. [Company responses to Amnesty International, 15/11/2017: amnesty.org] • Not met: Has reviewed management systems to prevent recurrence: Though the company explains that it conducted a review of its suppliers, there is no evidence it reviewed its management systems. Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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