CHRB Corporate Human Rights Benchmark

Corporate Human Rights Benchmark 2022 Company Scoresheet

World Benchmarking Alliance

The CHRB is part of the WBA

Company Name	Sony
Industry	ICT (Own Operations and Supply Chain)
Overall Score	19.0 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
5.6	25	B. Embedding Respect and Human Rights Due Diligence
6.0	20	C. Remedies and Grievance Mechanisms
2.9	25	D. Performance: Company Human Rights Practices
3.1	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

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, 2021: sony.com] Score 2 • Not Met: Commitment to the UNGPs • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Company has a commitment to the ILO Core: As indicated below, it is not clear whether all ILO core areas are respected in all contexts and locations. [Code of Conduct, 2021: sony.com] • Not Met: Company has a explicit commitment to All four ILO Core: The Code of Conduct covers Non-Discrimination, Forced Labour and Child Labour. Regarding the right to freedom of association and collective bargaining, it indicates: 'In conformance with applicable local laws and regulations, 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, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in conformance with applicable local laws and regulations'. [Code of Conduct, 2021: sony.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Company expect suppliers to commit to ILO Core: The Supply code indicates: 'Sony Group (…) adopts the RBA Code of Conduct (…) as its Code, which shall be applied to the manufacturing process for the Products at the Manufacturing Site and the Supplier'. The RBA Code is found in the Supply Chain Code of Conduct. The Code states: 'in alignment with the UN Guiding Principles on Business and Human Rights, the provisions in this Code are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles'. However, as indicated below, it is not clear whether the Company requires suppliers to respect all ILO core areas in all contexts and locations. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: Company explicitly list All four ILO for suppliers: The Company requires suppliers to comply with the RBA Code, which is found in the Supply Chain Code of Conduct. The Code forbids discrimination, forced and child labour. Regarding Freedom of Association and Collective Bargaining, it indicates 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, it is not clear whether the Company requires suppliers to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supply Chain Code of Conduct 3.1, 2021: sony.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to respect H&S of workers: The Company states that 'Sony is committed to maintaining a healthy, safe and productive work environment that is free from discrimination or harassment, in which all individuals are treated with respect and dignity. (…) We will also adhere to all applicable health and safety laws and regulations as well as internal rules and policies to help ensure workplace safety'. [Code of Conduct, 2021: sony.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week Score 2 • Met: Expect suppliers to commit to H&S of their workers: The RBA Code, required for suppliers, indicates that 'Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace'. It then lists its health and safety standards, that include: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The RBA Code is found in the Supply Chain Code of Conduct. The RBA Code indicates 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. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supply Chain Code of Conduct 3.1, 2021: sony.com]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Responsible mineral sourcing: The Company states in its Responsible Sourcing Policy: 'we (…) are committed to conducting our operations in a socially and environmentally responsible way and to sourcing from suppliers that share our values. As part of our ongoing sustainability efforts on sourcing of minerals, we are working with our suppliers to help assure sustainable and responsible sourcing of the minerals used in our products and to address issues related to human rights, labor conditions, health and safety and environmental protection in our supply chain'. [Policy for Responsible Supply Chain of Minerals 1.1, 01/10/2021: sony.com] & [Conflict Minerals Report CY 2019, 29/05/2020: sony.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Based on OECD Guidance: It also indicates: '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 Co-operation and Development (the "OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict affected and high-risk areas (the "OECD Guidance")'. [Policy for Responsible Supply Chain of Minerals 1.1, 01/10/2021: sony.com] • Met: Requires suppliers to commit to responsible mineral sourcing: The RBA Code, required for suppliers, is found in the Supply Chain Code of Conduct. It states: ´Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework´. [Supply Chain Code of Conduct 3.1, 2021: sony.com] Score 2 • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers: The Company´ Policy for Responsible Supply Chain of Minerals indicates: ´It Sony's suppliers of High Risk Materials are expected to comply with this policy and respond to our due diligence survey regarding responsible sourcing of High-Risk Minerals. Sony requires our suppliers to source minerals from smelters determined to be compliant with the RMAP or other smelters that have been determined not to be contributing to conflicts or serious human rights abuses under other trusted traceability projects. Each such supplier is also expected to have a policy, due diligence framework and management systems consistent with this policy to ensure that all High-Risk Minerals which are used in our products, components, or materials have been sourced from the smelter as stated above´. However, it is not clear the Company expects suppliers to follow the OECD Guidance to all minerals. [Policy for Responsible Supply Chain of Minerals 1.1, 01/10/2021: sony.com]
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Met: Expects suppliers to respect at least one of these rights: The RBA Code, required for suppliers, is found in the Supply chain code. It indicates 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. This applies to all workers including (…) migrant'. [Supply Chain Code of Conduct 3.1, 2021: sony.com] Score 2 • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: The Company 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, 2021: sony.com] • Not Met: Company expect suppliers to make this commitment Score 2 • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment Score 2 • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board level responsibility for HRs: Sony states that the duties of the Board are: 'Adoption, abolition and modification of the Charters of the Board of Directors, Nominating Committee, Audit Committee, Compensation Committee or any other committee established by the Board'. However, none of this committees are clearly responsible for overseeing HRs subjects. Furthermore, there is no evidence that a Board Member is tasked with specific governance oversight of one or more areas of respect for human rights. Sony also states that 'All Sony Group companies in Japan have a Diversity Committee, which meets to conduct workshops on human rights, diversity, and related matters as well as to share knowledge among colleagues', but that is not a Board Committee and, therefore, does not meet the requirements. [Board Charter, 19/06/2018: sony.com] & [Sustainability Report, 28/10/2019: sony.net] • Not Met: Describe HR expertise of Board member Score 2 • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board/Committee review HRs strategy: Sony states that 'The Sony Group Code of Conduct was established with the approval of the Sony Corporation Board of Directors and sets forth Sony's basic commitment to human rights. The CSR Section at Sony headquarters in Tokyo is responsible for analyzing and monitoring human rights risks throughout Sony Group's business activities and supply chains. CSR Section reports to the Corporate Executive Officer in Charge of CSR and works with relevant functions such as procurement, compliance and employees to manage potential human rights issues related to Sony's business activities and supply chains.'. Therefore, it is indicated that the CSR department is responsible for addressing HRs topics, and there is no evidence of discussions at Board level regarding the Company's approach to HRs. [Sustainability Report, 2021: sony.com] • Not Met: Examples/trends re HR discussion in the last reporting period: See above Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Incentives for at least one board member: In its Form 20-F, Sony indicates that the remuneration to directors is composed by a variable factor, which is 'remuneration linked to business results'. However, there is no evidence of clear incentives linked to the performance of the Company's HRs aspects. No new relevant evidence found in latest revision. [Form 20-F, 01/04/2022: sony.com] • Not Met: At least one key HR risk, beyond employee H&S Score 2 • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

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: Score of 1 on A.1.2.a

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			• Met: Senior responsibility for HR implementation and decision making: 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, 2021: sony.com] & [Sustainability Report, 28/10/2019: sony.net] Score 2 • Met: How it assigns 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] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR risks is integrated as part of enterprise risk system: Sony states that 'Additionally, there is a growing global regulatory and consumer focus on corporate social responsibility and sourcing practices and increasing regulatory obligations of public disclosure regarding these matters. In particular, there is increased attention on labor practices, including work environments at electronic component manufacturers and original design manufacturing/original equipment manufacturing, or ODM/OEM, product manufacturers operating in Asia. Increased regulation or public pressure in this area could cause Sony's compliance costs to increase, particularly since Sony uses many parts, components and materials to manufacture its products and relies on suppliers to provide these parts, components and materials but does not directly control the suppliers' procurement or employment practices. A finding of non-compliance, or the perception that Sony has not responded appropriately to growing consumer concern for such issues, whether or not Sony is legally required to do so, may adversely affect Sony's reputation, operating results and financial condition'. [Conflict Minerals Report CY 2019, 29/05/2020: sony.net] • Not Met: Provides an example Score 2 • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a • Met: Communicates its policy to all workers in own operations: Sony states that 'The Code, which is available on Sony's website and on each Sony Group company's intranet, has been translated into 23 languages to help ensure that it is clearly understood by the employees and relevant third parties. Sony will provide additional translations as may be necessitated by changing workforce demographics. All Sony Group employees and selected third party staff are required to complete Code of Conduct training within 90 days of hire or the commencement of provision of service'. [Sustainability Report, 2021: sony.com] Score 2 • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: The Company states that 'Sony requires that its primary suppliers ensure that the Sony Supply Chain Code of Conduct is observed by secondary and further suppliers. Primary suppliers conduct self-assessments to verify their understanding of the Sony Supply Chain Code of Conduct and to ensure that it has been communicated internally and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			is being complied with. Additionally, primary suppliers communicate the Sony Supply Chain Code of Conduct to their own supply chains and require compliance'. As indicated below, compliance is contractually enforced in suppliers. [Sustainability Report, 2021: sony.com] Score 2 • Met: How HR commitments made binding/contractual: Sony states that 'To enhance its CSR management in the supply chain, in 2016 Sony replaced the Sony Supplier Code of Conduct with the Sony Supply Chain Code of Conduct. The new code adopts the RBA Code of Conduct to govern all manufacturing processes at both Sony's own electronics manufacturing sites and those of its suppliers. The RBA Code of Conduct has been translated into 26 languages including English, Chinese, Japanese, Thai, and Malay, and was updated to Version 7.0 effective January 1, 2021. Accordingly, the Sony Supply Chain Code of Conduct was updated to Version 3.0 to adhere to the changes in the RBA Code of Conduct. Compliance with the Sony Supply Chain Code of Conduct is included in the contract signed when Sony begins doing business with a supplier. As a part of the customer requirements under this Code of Conduct, Sony requests compliance with the Green Partner Environmental Quality Approval Program and the Sony Group Policy for Responsible Supply Chain of Minerals.' [Sustainability Report, 2021: sony.com] • Not Met: Company requires suppliers to cascade down to their suppliers: The Company states that 'Sony requires that its primary suppliers ensure that the Sony Supply Chain Code of Conduct is observed by secondary and further suppliers. Primary suppliers conduct self-assessments to verify their understanding of the Sony Supply Chain Code of Conduct and to ensure that it has been communicated internally and is being complied with. Additionally, primary suppliers communicate the Sony Supply Chain Code of Conduct to their own supply chains and require compliance.' However, it is not clear if contractual or binding arrangements are required for indirect suppliers. [Sustainability Report, 2021: sony.com]
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Scores at least 1 on A.1.2.a • Met: How workers are trained on HR policy commitments: As stated on indicator B.1.4.a, Sony indicates that 'All Sony Group employees and selected third party staff are required to complete Code of Conduct training within 90 days of hire or the commencement of provision of service'. Furthermore, 'Sony adopted a "Compliance Education Protocol" to ensure that minimum ethics and compliance training and communications in critical risk areas are provided to all employees and relevant third parties working for Sony and a additional compliance training is mandated based upon risk assessments and employee and third party roles and responsibilities.' [Sustainability Report, 2021: sony.com] • Met: Trains relevant managers including procurement: The Company states that 'Sony's program starts with "Tone from the Top." Senior management continuously and repeatedly communicates the importance of being true to Sony's core ethical values. Their commitment is supported by a robust ethics and compliance program aligned with integral business processes including policies and procedures, training, ongoing risk assessments, program assessment and surveys, third-party risk management, monitoring and audits. Our procurement staff for our electronics manufacturing operations receives additional training on the Supply Chain Code standards, how to identify risks of slavery and human trafficking, and how to conduct an effective supplier assessment.' [Sustainability Report, 2021: sony.com] & [Modern Slavery Statement, 2021: sony.com] Score 2 • Not Met: Score of 2 on A.1.2.a • Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Scores at least 1 on A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: Sony states that 'The Sony Corporation Legal, Compliance & Privacy Department works with global compliance team members and local business unit leaders to conduct comprehensive risk assessments and implement compliance policies, procedures and internal controls to prevent and detect unethical behavior. It provides oversight of the investigation of and follow-up on any incidence of policy non-compliance or potential violation of law. Sony also has a Compliance Monitoring function, which measures the effectiveness and maturity of Sony's overall compliance program by conducting periodic assessments of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			program design and implementation. It also conducts risk-based compliance audits and validations of controls. The Sony Corporation Board of Director's Audit Committee provides ultimate oversight of Sony's program and receives monthly reports and periodic in-person updates about the compliance program activities. Reports to the Board's Audit Committee provide program performance results, compliance hotline metrics, employee training data, and new program and communications initiatives, as well as updates on global regulatory developments.' [Sustainability Report, 28/10/2019: sony.net] • Not Met: Proportion of supply chain monitored: Sony states that 'In fiscal 2018, 16 manufacturing sites in Japan, China, Korea, Thailand, Malaysia, UK, Mexico and Brazil completed self-assessment surveys. The results showed that risk of non-compliance was low at all manufacturing sites.' However, this statement is about Sony's own manufacturing facilities and does not include the proportion of the Supply Chain that was monitored. • Not Met: Describe how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process: Sony states that 'If a manufacturer is suspected to be in violation of the Sony Supply Chain Code of Conduct, an on-site visit is conducted to verify the actual management situation. Sony issues improvement instructions if needed, verifies the improvement results, and assesses to start business dealings'. Furthermore, '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, Sony cooperates with the supplier in question to confirm the facts of the case expeditiously and objectively. Specifically, Sony may request that the supplier's manufacturing site undergo a third-party RBA audit. In the event that any deficiencies are discovered, the supplier is required to develop an improvement plan, and Sony monitors the supplier's performance in the form of follow-up audits to ensure the progress of initiatives. 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.' Although those statements describes corrective action processes, no evidence disclosing the number of incidents was found [Sustainability Report, 28/10/2019: sony.net] • Met: Disclose findings and number of corrective action: Sony demonstrates the following: 'Examples of Instructions for Improvement Based on Observations from On-Site Assessments: Working hours - Observation: Excessive working hours at a supplier in China (over 60 hours per week). Improvement instructions: Requested systematic improvement of working hours (to bring them below 60 hours per week), and regular monitoring until improvements are completed.' [Sustainability Report, 28/10/2019: sony.net]
B.1.7	Engaging and terminating business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR affects selection of suppliers: In the context of fair procurement, the Company indicates the following: 'Sony selects its suppliers and contractors on the basis of competitive price, quality, delivery and other objective standards. Sony expects its suppliers and contractors to adhere to Sony's ethical values and comply with applicable Sony policies concerning compliance with laws, respect for human rights, fair labor and employment practices, environmental conservation and the safety of products and services'. Furthermore, 'Compliance with the Sony Supply Chain Code of Conduct is factored in when choosing suppliers, who are assessed and selected based on human rights, ethical, environmental, and health and safety considerations, in addition to other factors.' [Code of Conduct, 2021: sony.com] & [Sustainability Report, 2021: sony.com] • Not Met: HR affects on-going supplier relationships: Sony states that 'In fiscal 2018, Sony requested that all suppliers including existing suppliers comply with the Sony Supply Chain Code of Conduct, and conducted document assessments for 126 companies. […] In the event that any deficiencies are discovered, the supplier is required to develop an improvement plan, and Sony monitors the supplier's performance in the form of follow-up audits to ensure the progress of initiatives. 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.' However, there is no clear evidence regarding decisions to expand, renew or terminate business relationships based on human rights issues. [Sustainability Report, 2021: sony.com] Score 2 • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The Company states that 'Sony provides support to suppliers in order to improve their initiatives. In

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			Southeast Asia and China, local liaison officers assigned to communicate directly with suppliers are provided with the educational and training opportunities needed to serve as CSR specialists at local sites. These CSR specialists strive to ensure that suppliers make continuous efforts to improve management systems and other organizational structures, by communicating with them and providing direct guidance on ways to improve.' Furthermore, 'In fiscal 2018, Sony conducted on-site checks for safety management at supplier facilities, as it did in the previous fiscal year. These on-site checks enabled Sony to identify issues and instruct suppliers to improve the fire prevention management at their facilities. Issues that were frequently identified in the on-site checks included degraded power lines, malfunctioning fire doors, and deficiencies in the installation of control boards for fire pumps. In addition, as part of its efforts to prevent the use of forced labor, Sony provided suppliers in its supply chains with up-to-date information on human rights related laws and regulations and common industry findings, as well as providing assessment tools and codes of conduct. These initiatives helped to further strengthen Sony's supply chain management.' [Sustainability Report, 28/10/2019: sony.net]
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	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 2020, Sony engaged BSR to update its human rights impact assessment across its value chain. Based on its findings, in addition to the potential risks identified above, BSR recommended that Sony enhance its efforts to include potential risks that customers with whom Sony has direct or indirect business relationships may contribute to human rights abuse.' [Sustainability Report, 2021: sony.com] • Met: Identifying risks through relevant business relationships: See above [Sustainability Report, 2021: sony.com] Score 2 • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describe process for assessment of HR risks and discloses salient HR issues: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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 AI, were identified. Sony will continue to monitor and address its human rights risks across our operations.' [Sustainability Report, 2021: sony.com] • Not Met: How process applies to supply chain • Met: Public disclosure of the results of HR assessment: 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 AI are the key risks. [Sustainability Report, 2021: sony.com] Score 2 • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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, 2021: sony.com] • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	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, 2021: sony.com] Score 2 • Met: Channel is available in all appropriate languages and workers aware: As above [Code of Conduct, 2021: sony.com] & [Sustainability Report, 2021: sony.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: Company's mechanism is open to all. In Addition, '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'. [Code of Conduct, 2021: sony.com] • Met: Expect Suppliers to convey expectation to their own suppliers: 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'. [Code of Conduct, 2021: sony.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Company details the main communication methods for each of its stakeholders. In Addition, it indicates 'Sony also operates a hotline for external stakeholders to report violations of the Supply Chain Code.' [Modern Slavery Statement, 2021: sony.com] Score 2 • Met: Describes accessibility and local languages and stakeholder awareness: The company has flexible channels for these regions: America, Europe, China, Asia-Pacific, Oceania, Middle East, Japan and Africa. [Support / Contact Us for Electronics and Games, N/A: sony.com] • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers: 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. [Sustainability Report, 2021: sony.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Response timescales and how complainants will be informed: The company indicates 'Each Regional Compliance Officer reviews all reports and responses in his or her region, as an added check to help assure matters are fully and fairly addressed. The status of raised concerns is also reported on a monthly basis to the Sony Group Corporation Compliance & Privacy Department, which provides a report to the Sony Group Corporation Audit Committee.' [Sustainability Report, 2021: sony.com] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants: The company states: "All concerns raised through the Hotline are investigated independently of ordinary internal reporting structures. Third party representatives, following the receipt of concerns, check possible conflicts of interest before providing necessary information to the appropriate Regional Compliance Office ("Office") . The Office reviews the information and determines what initial actions are appropriate. The Office investigates the allegation (or ask appropriate department to investigate the allegation) under the oversight of the Regional Compliance Officer, collect more information, or take other actions as appropriate. The Office also works with legal and/or other subject matter experts to determine how best to investigate and resolve the allegations. Management will take corrective action to improve business operating systems or take disciplinary action against employees who have violated the law or company policy, when the facts warrant doing so." However, none of the above describes any support offered to the complainants to ensure they are equipped to equally participate in the process. [Sustainability Report, 2021: sony.com] Score 2 • Not Met: Describe types of outcome to complainant through use of mechanism • Met: Escalation to senior/independent level: The company says: "Management will take corrective action to improve business operating systems or take disciplinary action against employees who have violated the law or company policy, when the facts warrant doing so." [Sustainability Report, 2021: sony.com]
C.5	Prohibition of retaliation for raising complaints or concerns	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public statement prohibiting retaliation: The Company states that 'Sony does not tolerate retaliation against anyone who participates in an investigation or raises a concern in good faith and vigorously enforces and promotes its policy against retaliation'. [Sustainability Report, 28/10/2019: sony.net] • Met: Practical measures to prevent retaliation: Sony states that 'All information provided to the Hotline is handled confidentially. Calls to the Hotline are not recorded or traced, and reporters may remain anonymous to the extent permitted by law [...] Sony also provides training to its managers on how to create an

Indicator Code	Indicator name	Score (out of 2)	Explanation
			environment where employees feel comfortable speaking up when they observe unethical behavior, how to handle reports and how to prevent retaliation since Sony understands that the employees may prefer to raise concerns with their manager in the first instance'. [Sustainability Report, 28/10/2019: sony.net] & [Sustainability Report, 2021: sony.com] Score 2 • Met: Company indicate it will not retaliate against workers/stakeholders: The company indicates that " Sony protects reporters from retaliation." [Modern Slavery Statement, 2021: sony.com] • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company states that 'Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Participants should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.' However, no clear evidence that this conduct extents to other stakeholders was found. [Code of Conduct, 2021: sony.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	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 FY2020, the Hotline received approximately 370 concerns. Among them, approximately 76% raised matters related to employees, diversity and workplace. 20% was related to business integrity. The remaining concerns comprised environmental and other matters. In FY2020, 110 concerns were substantiated and remediated as appropriate. For example, an allegation involving substantiated workplace misconduct resulted in disciplinary action taken against the employee who engaged in the inappropriate behavior.'. However, no clear evidence describing how remedy has been provided to victims was found. [Sustainability Report, 2021: sony.com] • Not Met: Says how it would provide remedy for victims if no adverse impact identified Score 2 • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Number grievances filed, addressed or resolved and outcome achieved: In FY2020, the Hotline received approximately 370 concerns. Among them, approximately 76% raised matters related to employees, diversity and workplace. 20% was related to business integrity. The remaining concerns comprised environmental and other matters. In FY2020, 110 concerns were substantiated and remediated as appropriate. For example, an allegation involving substantiated workplace misconduct resulted in disciplinary action taken against the employee who engaged in the inappropriate behavior.' [Sustainability Report, 2021: sony.com] • Not Met: How lessons from mechanism improve management system Score 2 • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Pays living wage or sets target date: The company states that "Labor and Employment Laws (including Subcontract Act, wage and hour laws, etc.)" are included in the key legal and compliance risk areas assessed, however, no evidence was found to support the payment of this living wage. [Sustainability Report, 2021: sony.com] • Not Met: Describes how living wage determined Score 2 • Not Met: Paying living wage: The company states that "Labor and Employment Laws (including Subcontract Act, wage and hour laws, etc.)" are included in the key legal and compliance risk areas assessed, however, no evidence was found to support the payment of this living wage. [Sustainability Report, 2021: sony.com] • Not Met: Definition of living wage reviewed with unions
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Discloses living wage requirements in supplier code or contracts: Sony states that 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' However, no evidence found of a description of the living wage that includes reference to family and/or dependents, including some discretionary income. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: Improving living wage practices of suppliers Score 2 • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): In its Sustainability report, the company says: "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.". However, the company does not specify who the direct or indirect suppliers are. [Sustainability Report, 2021: sony.com] Score 2 • Not Met: Discloses names and locations of significant parts of SP and why: In its Sustainability Report, Sony provides a map including the locations and names of the Company's own manufacturing sites. However, no evidence regarding suppliers or significant parts of the supply chain was found. [Sustainability Report, 28/10/2019: sony.net] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Does not use child labour: The company states that 'Sony will not use child labor. "Child" means a person younger than 15 years old (or younger than 14 years old where a local law provides for a lower age) or the local legal minimum age for labor, if it is higher. This does not apply to work or service of performers or recording artists or that otherwise by its nature is reasonably necessary to be procured from a child, to the extent permitted by local law (for example, a child actor/actress)'. [Code of Conduct, 2021: sony.com] • Not Met: Age verification of workers recruited Score 2 • Not Met: Remediation if children identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Child Labour rules in codes or contracts: Sony states that 'Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.' However, the Company does not mention verifying the age of job applicants and requiring existence of remediation programs in case child labour is found. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: How working with suppliers on child labour: The company says "If child labor is identified, assistance/remediation is provided." However, no specific details are given. [Supply Chain Code of Conduct 3.1, 2021: sony.com] Score 2 • Not Met: Assessement of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Job seekers and workers do not pay recruitment fee • Not Met: Commits to fully reimbursing if they have paid Score 2 • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Debt and fees rules in codes or contracts: Sony states that 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used [...] Workers shall not be required to pay employers’ or agents’ recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.' [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Met: How working with suppliers on debt & fees: Sony says that "Workers shall not be required to pay employers 'agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker." [Supply Chain Code of Conduct 3.1, 2021: sony.com] Score 2 • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Pays workers in full and on time • Not Met: Payslips show any legitimate deductions Score 2 • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time Score 2 • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Does not retain documents or restrict movement Score 2 • Not Met: How these practices are monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Free movement rules in codes or contracts: Sony states that 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities [...] All work must be voluntary and workers shall be free to leave work at any time or terminate their employment Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law'. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: How working with suppliers on free movement Score 2 • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company states that 'In conformance with applicable local laws and regulations, 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.' Furthermore, it indicates that 'Sony is committed to maintaining a healthy, safe and productive work environment that is free from discrimination or harassment […] Sony will not tolerate any form of discrimination, or harassment of any kind, including sexual harassment, bullying or other behaviors that create a hostile work environment.' However, no evidence found referring to alternative mechanisms where Freedom of Association and Collective Bargaining are restricted under local laws, and to specifically prohibiting retaliation against union members and representatives. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Met: Discloses % total direct operations covered by collective CB agreements: Approximately 13% of the overall workforce is unionized [Sustainability Report, 28/10/2019: sony.net] Score 2 • Not Met: Meets both requirements under score 1
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: FoA & CB rules in codes or contracts: Sony states that 'Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on […] political affiliation, union membership […] in hiring and employment practices such as wages, promotions, rewards, and access to training.' Furthermore, 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, no evidence regarding alternative mechanisms where Freedom of Association and Collective Bargaining are restricted under local law was found. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: How working with suppliers on FoA and CB Score 2 • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes process to identify H&S risks and impacts: The Company indicates ' All manufacturing, logistics and R&D sites have implemented OHS Management system based on ISO45001. For the purpose of preventing and reducing occupational injuries and illnesses of employees and external contractors, we provide training, education, promotion campaign and initiatives for raising safety awareness. In FY2020, five manufacturing sites and one distribution center/logistics site have obtained ISO45001 external certification.' [Sustainability Report, 2021: sony.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The company report 'Injury frequency rate for accidents causing absence from work: 0.10 (45% decrease year-on-year) and Injury frequency rate for accidents causing absence from work (Outside Japan/East Asia region): 0.55 (3% increase year-on-year).' [Sustainability Report, 2021: sony.com] • Met: Discloses Fatalities for last reporting period: Company report no fatalities for the year of 2016 to 2020. [Sustainability Report, 2021: sony.com] • Not Met: Occupational disease rate for last reporting period Score 2 • Not Met: Set targets for H&S performance: The company says: "With a focus on diversity, equity & inclusion, talent development, and engagement, Sony Group will continue to offer working conditions that contribute to the health and safety of employees — all part of its efforts to achieve sustainable growth and generate social value." However, this is just describing a general aspiration and does not present a clear target the company is committed to working towards. [Sustainability Report, 2021: sony.com] • Not Met: Met targets or explain why not or what is doing to improve management systems
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Sets out clear Health and Safety requirements: Sony states that 'Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, 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. Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.' Following that statement, the Company sets outs requirements regarding occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene and others. [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period Score 2 • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Process to stop harassment and violence against women: The company states 'the Ethics & Compliance Hotline and other reporting mechanisms, each Sony group company in Japan maintains an Equal Employment Opportunity (“EEO”) counseling hotline to enable it to take immediate action on potential human rights issues and risks, including harassment. Sony has also established the Sony Group EEO hotline to provide counseling throughout the Group on a wide range of equal opportunity-related issues concerning all types of harassment (sexual harassment, power harassment, maternity harassment, etc.) , work-life balance, parenting, caregiving, LGBTQ+ issues in the workplace, and other issues. ' [Sustainability Report, 2021: sony.com] • Not Met: Working conditions take account of gender • Met: Measures and steps to address gender pay gap at all levels of employment: The company say: "Sony is working to achieve gender equality and empower women as outlined in Goal 5 (gender equality) by establishing action plans to increase career opportunities for women and implementing ongoing initiatives at group companies." [Sustainability Report, 2021: sony.com] Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Women's rights in codes or contracts • Not Met: How working with suppliers on women's rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Respects max hours, min breaks and rest periods in its own operations • Not Met: Assesses ability to comply with its commitments when allocating work/targets Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Working hours in codes or contracts: Sony states that 'Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. 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 stating that a regular work week should not exceed 48 hours was found (or that the Company requires suppliers to follow ILO conventions). [Supply Chain Code of Conduct 3.1, 2021: sony.com] • Not Met: How working with suppliers on working hours Score 2 • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company's Supply Chain Code of Conduct indicates: 'Responsible Sourcing of Minerals. Participants shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.' In addition, on its website, it indicates: '[…] to ensure that products, components or materials delivered to Sony do not contain any conflict minerals, Sony expects suppliers to have in place pertinent policies, a due diligence framework and a management system consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.' However, the Supply Chain Code of Conduct does not include this requirement. [Supply Chain Code of Conduct 3.1, 2021: sony.com] & [Addressing High-Risk Mineral Issues, 29/08/2019] • Not Met: Works with smelters/refiners and suppliers to build capacity: On its website, the Company states that it 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 raw materials.' In addition, in its Conflict Minerals Report FY 2018, it indicates: 'We provided training and/or other relevant materials to help such suppliers understand the Policy and to assist such suppliers with meeting our 3TG due diligence and related compliance efforts. […]'. However, no information about how the Company works with smelters/refiners. [Responsible Sourcing of Raw Materials, 29/08/2019] & [Conflict Minerals Report CY 2019, 29/05/2020: sony.net] Score 2 • Met: Contractual requirement to disclosure smelter/refiner information: The Company requires in its Supply Chain Code of Conduct: 'Participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request'. The Company states that compliance with the Sony Supply Chain Code of Conduct is included in supplier contracts. [Supply Chain Code of Conduct 3.1, 2021: sony.com] & [Sustainability Report, 28/10/2019: sony.net] • Not Met: Contractual requirement covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Risk identification and disclosure in line with OECD Guidance: The Company's Conflict Minerals Report CY 2019, includes the 'Identify and assess risk in the supply chain' section. However, no evidence found about risks and impacts identified in its supply chain. [Conflict Minerals Report CY 2019, 29/05/2020: sony.net] • Met: Identification of smelter/refiners and OECD Guidance: The Company indicates in its Conflict Minerals Report: 'We surveyed all in-scope direct suppliers to determine the status of any 3TGs in Materials supplied to Sony […]. We utilized the CMRT survey tool to collect this information and asked the suppliers to respond to the CMRT at their product level, rather than at the company level. […] We compared the SORs identified by in-scope direct suppliers in the CMRT against the list of SOR facilities that have been validated as a RMAP conformant smelter for tantalum, tin, tungsten and gold and/or have been validated by London Bullion Market Association and/or the Responsible Jewellery Council for gold […]. Sony determined it had insufficient information to conclude either (i) that there was no reason to believe that any of its necessary 3TG originated in the Covered Countries, or (ii) that all of its necessary 3TG came from recycled or scrap sources. Therefore, Sony conducted due diligence'. [Conflict Minerals Report CY 2019, 29/05/2020: sony.net] Score 2 • Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses the list of all qualified smelters/refiners in its Conflict Minerals Report. [Conflict Minerals Report CY 2019, 29/05/2020: sony.net] • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes mineral risk management plan for supply chain • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time Score 2 • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		• Area: Forced labour • Headline: Sony among companies accused of using suppliers linked to forced labour in China • Story: On March 1st, 2020, the Australian Strategic Policy Institute (ASPI) released a report called "Uyghurs for sale" that named Sony among 83 companies benefiting from the use of potentially abusive labour transfer programmes. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. In addition, the think tank said that the workers were allegedly transferred out of Xinjiang between 2017 and 2019 and claimed that people are being effectively "bought" and "sold" by local governments and commercial brokers. The ASPI used open-source public documents, satellite imagery, and media reports, allowing to identify 27 factories in nine Chinese provinces that have used labourers. The research found up to 560 Xinjiang workers were transferred to work several factories including to Foxconn Technology, that supplies brands such as Amazon, Apple, Dell, Google, Huawei and Microsoft. Other factory implicated is O-Film Technology which supplies Apple, Huawei, Lenovo and Samsung with camera and touchscreen components. ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". The report calls on companies mentioned to "conduct immediate and thorough human rights due diligence on its factory labour in China, including robust and independent social audits and inspections." On July 22, 2020, O-Film subsidiary Nanchang, a Sony supplier, was one of the eleven companies blacklisted by the U.S. Department of Commerce's Bureau of Industry and Security over alleged human rights abuses involving Uighur Muslims in China. According to the U.S. Department of Commerce, the O-Film subsidiary was named on the list "in connection with the forced labour of Uighurs and other Muslim minority groups in western China". Companies on the list must apply for special licenses to access U.S. technologies. [ABC, 01/03/2020, ''Apple, Nike and other major companies implicated in Muslim forced labour in China'': abc.net.au] [Australian Strategic Policy Institute, 01/03/2020, ''Uyghurs for sale'': aspi.org.au] [The Guardian, 01/03/2020, ''China transferred detained Uighurs to factories used by global brands – report'': theguardian.com] [ZDNet, 22/07/2020, ''US adds 11 more Chinese companies to entity list for Uyghur human rights violations'': zdnet.com]
E(1).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: Sony declined to comment on specific suppliers. In a statement to Reuters, it said if any supplier is confirmed to have committed a major violation of its code of conduct, which prohibits the use of forced labor, then "Sony will take appropriate countermeasures including request for implementing corrective actions and termination of business with such supplier." In response to Human Rights Now's recommendation to clarify its business relationships with the suppliers linked to forced labor, Sony declared: "As a result of the investigation, we identified no direct business partners of Sony in Xinjiang Uygur Autonomous Region. RBA (as for Sony's Supply Chain Code of Conduct, the "Responsible Business Alliance") and RBA member companies conducted third party assessments on suppliers cited in the ASPI report, including a local level assessment. As a result, we identified that there was no fact of forced labor". Similarly, in response to the observations formulated by the UN Human Rights Council Special Procedures, the Company stated on May 14th 2021: "We have carried out investigations in cooperation with the RBA including independent site-

Indicator Code	Indicator name	Score (out of 2)	Explanation
			level assessments concerning related labor risks described in the report released by the ASPI on March 2020. As a result, we have not found explicit forced labour indicators at the visited manufacturing sites in our supply chain". [Reuters, 08/10/2021, "EXCLUSIVE US electronics firm struck deal to transport and hire Uyghur workers": reuters.com] [Human Rights Now, 06/05/2021, "Japanese Companies' Links to Forced Labor in Xinjiang Uyghur Autonomous Region and Corporate Responsibility": hrn.or.jp] [Sony, 14/05/2021, Reply to the Joint Communication from Special Procedures (AL OTH 154/2021): spcommreports.ohchr.org] [Supply Chain Code of Conduct 3.1, 2021: sony.com] Score 2 • Not Met: Detailed response: The company responded in very general terms and did not address at all the involvement of its supplier O-Firm in forced labour practices in Xinjiang.
E(1).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. There is further no indication that the company engaged with adequate representatives of the affected stakeholders outside of China, such as exile Uyghur organisations. • Not Met: Identified cause: Sony declared: "As a result of the investigation, we identified no direct business partners of Sony in Xinjiang Uygur Autonomous Region. RBA and RBA member companies conducted third party assessments on suppliers cited in the ASPI report, including a local level assessment. As a result, we identified that there was no fact of forced labor". Thereby, the company does not present investigative results on the underlying causes of the forced labour. [Human Rights Now, 06/05/2021,: hrn.or.jp] Score 2 • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: The Company stated: "We have carried out investigations in cooperation with the RBA including independent site-level assessments concerning related labor risks described in the report released by the ASPI on March 2020. As a result, we have not found explicit forced labour indicators at the visited manufacturing sites in our supply chain". However, the company did not provide sufficient evidence to prove it is not linked to the impact. [Sony response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 154/2021), 14/05/2021,: spcommreports.ohchr.org] Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used: The Company stated: "We have carried out investigations in cooperation with the RBA including independent site-level assessments concerning related labor risks described in the report released by the ASPI on March 2020. As a result, we have not found explicit forced labour indicators at the visited manufacturing sites in our supply chain". However, this does not describe an independent process as required for this datapoint. [Sony response to joint communication by UN Special Rapporteurs dated 12/03/21 (OTH 154/2021), 14/05/2021,: spcommreports.ohchr.org]
E(2).0	Serious allegation No 2		• Area: Child labour • Headline: Apple, LG Chem, and others criticized for inadequate screening of cobalt tainted with child labor • 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." Amnesty'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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Group, Daimler AG, L&F Co., Fiat-Chrysler Automobiles NV, General Motors, Renault Group. In 2019 some of the companies named in the report were sued by a group of affected stakeholders. This shows that the search for remedy continues. [Mining Technology, 02/04/2017, "Cobalt could enable a green revolution, but can it clean-up its reputation first?": mining-technology.com] [Amnesty International, 15/11/2017, "Democratic Republic of the Congo: Company responses to Amnesty International regarding cobalt in their supply chains": amnesty.org] [The Register, 16/12/2019, "Alphabet, Apple, Dell, Tesla, Microsoft exploit child labor to mine cobalt for batteries, human-rights warriors claim": theregister.co.uk]
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: The company provided a response to Amnesty International (AI) with respect to the allegations presented in AI's 2016 report and subsequent 2017 report on child labour in cobalt supply chains. [Amnesty International, 19/01/2016, "Democratic Republic of Congo: "This is what we die for": Human rights abuses in the Democratic Republic of the Congo power the global trade in cobalt" p.58: amnesty.org] [Mining.com, 19/01/2016, "Apple, Sony, Samsung linked to child labour claims in cobalt mines": mining.com] [Amnesty International, 15/11/2017,: amnesty.org] Score 2 • Not Met: Detailed response: The company's response in 2016 does not provide detail: "We take this issue seriously and have been conducting a fact-finding process. So far, we could not find obvious results that our products contain the cobalt originated from Katanga in the DRC." The company's response in 2017 addresses its alleged relationship with the supplier, "As a result of that investigation, five suppliers have reported that the cobalt contained in the battery parts they delivered to us include the ones that are sourced from the Democratic Republic of Congo (DRC), and two of such five suppliers have reported that there were cobalt sourced from Huayou Cobalt." However, the response does not address the allegation of inadequate screening for child labor specifically in its cobalt supply chain. [Amnesty International, 19/01/2016,: amnesty.org] [Amnesty International, 15/11/2017,: amnesty.org]
E(2).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders: The company's 2017 response does not describe how the company or its suppliers engaged with affected stakeholders or their legitimate representatives. The company's response refers to an "investigation", but there is no evidence to suggest that this process was mandated by the affected stakeholders. [Amnesty International, 15/11/2017,: amnesty.org] • Not Met: Identified cause: The company states in its 2017 response that, "… Sony supported an independent academic research project conducted by Center for Effective Global Action (CEGA) at the University of Berkley … The study … will provide evidence on the prevalence, the forms, and o the root cause of child labor in artisanal mining in the region." However, there is no evidence that the company has itself sought to identify the cause of the alleged impacts. [Amnesty International, 15/11/2017: amnesty.org] Score 2 • Not Met: Identified and implemented improvements: The company's 2017 response states, "Sony has established a management system to regularly assess and minimize the risk of violation throughout its supply chain." However, there is no evidence that the company has improved its management system to prevent child labour in its cobalt supply chain or how the views of affected stakeholders informed any changes/improvements. [Amnesty International, 15/11/2017: amnesty.org] • Not Met: Stakeholder input to steps taken: See above.
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy: There is no evidence that the company has provided a remedy. • Not Met: Evidence for lack of Impact or link: The company denies a direct link to the allegations. However, the company does not provide detailed evidence of its investigation underpinning its conclusion, starting only, "As for the supplier mentioned in the Amnesty International's report, we also conducted follow-up interviews and confirmed that the battery parts they delivered to Sony did not contain cobalt."

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Remedy satisfactory to stakeholders: See above. • Not Met: Remedy delivered: See above. • Not Met: Independent remedy process used: The company disputes the allegations. There is no evidence that the company participated in an independent process to reach its conclusion.
E(3).0	Serious allegation No 3		• Area: Working hours • Headline: Sony employee dies due to overwork in the United Arab Emirates • Story: On March 15, 2021, press sources reported that the Mita Labour Standards Inspection Office in Japan ruled that a 40-year-old Sony employee died due to overwork. The Japanese employee was assigned overseas and, according to the authority, died in the parking lot of his Dubai office on 15 January 2018, ten days after returning from a business trip to Japan. The Inspection Office found that the employee worked 80 average monthly hours more than normal hours for the three months immediately before his death and, in February 2021, his death was attributed to overwork. The authority recognized a causal relationship between his death and overtime work, determining it a workplace injury. [Business and Human Rights Resource Centre, 30/03/2021, ''Sony says it will strengthen efforts to address workplace safety after employee's death by overwork'': business-humanrights.org] [Telle Report, 15/03/2021, ''Sony employee died from overwork and died of heart disease during overseas assignment'': tellerreport.com]
E(3).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: A public relations representative at Sony gave the following response: “We offer heartfelt condolences to the deceased employee. We seriously accept the Labour Standards Inspection Office’s ruling and will strengthen our efforts to prevent workplace injury and to manage our workers’ health. Furthermore, we will sincerely address any guidance from the Labour Standards Inspection Office arising from this ruling.” [Business and Human Rights Resource Centre, 30/03/2021: business-humanrights.org] Score 2 • Not Met: Detailed response: The company responded in very general terms and did not address the contents of the Labour Standards Inspection Office's ruling or the reasons for the employee's death.
E(3).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 • Not Met: Identified and implemented improvements: In its 2021 Sustainability report the company stated that "To reduce employee health risks, Sony strives to maintain and promote mental health. Sony is working to increase the percentage of sites that use the results of stress tests to implement workplace improvements. Sony is also sharing information on good practices throughout the group, as well as implementing " No Overtime Days" and taking steps to ensure employees do not work excessive hours". However, this report focuses on the company's activities in FY 2020. Therefore, this report is not detailing improvements that the company made after the alleged event. The company stated that: "We seriously accept the Labour Standards Inspection Office’s ruling and will strengthen our efforts to prevent workplace injury and to manage our workers’ health. Furthermore, we will sincerely address any guidance from the Labour Standards Inspection Office arising from this ruling." However, the CHRB did not find evidence that the company implemented changes to its management system following the ruling. [Business and Human Rights Resource Centre, 30/03/2021: business-humanrights.org] [Sustainability Report, 28/10/2019: sony.net] • Not Met: Stakeholder input to steps taken
E(3).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(4).0	Serious allegation No 4		• Area: Discrimination • Headline: Sony investigating bullying and harassment claims from its employees • Story: On June 13, 2021, press sources reported that Sony Music's head office in the U.S. is investigating claims of discrimination, bullying, and harassment at its Australian branch. In April 2021, Sony Music Australia reportedly sacked its vice president of commercial music, after an internal investigation found he had bullied and harassed a number of employees at the company. Since the dismissal of the vice president, a dozen current and former Sony Music staff members have contacted the press to reveal their experiences of alleged discrimination, bullying, and sexual harassment. A former employee claimed she raised concerns about the behaviour of the vice president, but her concerns were dismissed. "I remember trying to speak to a more senior colleague and she said, 'this is the culture here, you will get used to it'" she said. According to press sources, the company is alleged to have made pregnant women and new mothers redundant, only for their roles to be renamed and filled by someone new. [The Sunday Morning Herald, 13/06/2021, ''Global Sony boss investigating bullying and harassment claims in Australia'': smh.com.au] [The Industry Observer, 13/06/2021, ''BREAKING: More alleged harassment & sexism claims at Sony Music Australia'': theindustryobserver.thebrag.com] [The Guardian, 23/06/2021, ''Sony Music Australia: more executives on leave as investigation into workplace culture continues'': theguardian.com] [Music Business Worldwide, 21/06/2021, ''Sony Music Australia Boss Denis Handlin Exits After 50+ Years With The Company'': musicbusinessworldwide.com
E(4).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public response: In response to the allegation, Sony Music Entertainment in New York provided the following statement to Guardian Australia: "We take all allegations from our employees very seriously and investigate them vigorously. These claims only recently came to light and we are examining them expeditiously. Harassment, bullying and other inappropriate behavior is not tolerated by Sony Music at any of our companies and we are committed to ensuring a safe and respectful workplace for our employees. Given our ongoing inquiries, we cannot comment further". [The Guardian, 23/06/2021: theguardian.com] Score 2 • Met: Detailed response: In response to the allegation, Sony Music Entertainment in New York provided the following statement to Guardian Australia: "We take all allegations from our employees very seriously and investigate them vigorously. These claims only recently came to light and we are examining them expeditiously. Harassment, bullying and other inappropriate behavior is not tolerated by Sony Music at any of our companies and we are committed to ensuring a safe and respectful workplace for our employees. Given our ongoing inquiries, we cannot comment further". [The Guardian, 23/06/2021: theguardian.com]
E(4).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(4).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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

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