

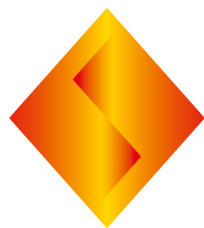
**Sony Joint Modern Slavery Statement –  
*Modern Slavery Act 2018 (Cth)***

**Reporting Period: Financial Year 2023  
(1 April 2023 – 31 March 2024)**

**Reporting Year: 5**

**Submission Date: 26 September 2024**

**SONY**



**Sony  
Interactive  
Entertainment**



## Foreword from our Directors

This joint modern slavery statement (“**Joint Statement**”) covers all Sony companies operating and carrying out business in Australia, who are required to publish a modern slavery statement under the *Modern Slavery Act 2018* (Cth) (**Australian Modern Slavery Act**) (collectively referred to as “**Australian Sony Reporting Entities**”, “**we**” or “**us**”).

This is our fifth Joint Modern Slavery Statement under the Modern Slavery Act, covering the reporting period from 1 April 2023 – 31 March 2024 (“**Financial Year 2023**”).

Since the commencement of the Modern Slavery Act, the Australian Sony Reporting Entities approach to assessing and addressing modern slavery risks in our operations and supply chains has been informed by Sony’s global values, policies and procedures and supplemented by additional local measures.

This Joint Statement reports on our ongoing efforts and some of our key achievements for Financial Year 2023 to address the complex issue of modern slavery in our operations and supply chains. This year, this Joint Statement also covers two new Australian Sony Reporting Entities, Sony Music Publishing (Australia) Pty Limited and Crunchyroll, LLC (which is majority-owned by Sony Pictures), who respectively met the threshold for reporting under the Australian Modern Slavery Act in Financial Year 2023.

Sony is aware of the potential human rights impacts of its global business activities. Sony recognizes that respecting human rights throughout Sony’s value chain and addressing any potential human rights risks, whether the relationship with Sony’s business operation is direct or indirect, is a responsibility that a diverse range of stakeholders hold Sony accountable to. Sony has set down its fundamental human rights policy in the Sony Group Code of Conduct and the Sony Group Human Rights Policy, which apply to all Australian Sony Reporting Entities and specifies that respecting human rights should be the basic stance of all Sony directors, officers, and employees.

At the local level the Australian Sony Reporting Entities are also aware that there have been significant developments in the Australian regulatory environment. As part of the review of the Australian Modern Slavery Act, the Australian Government published its *Report of the statutory review of the Modern Slavery Act 2018 (Cth)* (the “**Report**”). We understand the Australian Government is in the process of reviewing and responding to the recommendations tabled in the Report to reform the Australian Modern Slavery Act. In our next reporting period, we intend to consider the Australian Government’s review and monitor the progress of recommendations.

We look forward to reporting on our progress in future statements.

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## 1. Mandatory Criterion 1 – Identify the reporting entities

This joint modern slavery statement (“Joint Statement”) meets the requirements for approval and signature set out in section 14 of the Commonwealth Modern Slavery Act 2018 (*Cth*) (the “**Australian Modern Slavery Act**”).

This Joint Statement covers all Sony companies operating and carrying out business in Australia, who are required by the Australian Modern Slavery Act to publish a modern slavery statement (collectively referred to as “Australian Sony Reporting Entities”, “**we**” or “**us**”). This year, this Joint Statement also covers two new Australian Sony Reporting Entities, Sony Music Publishing (Australia) Pty Limited and Crunchyroll, LLC (which is part of the Sony Pictures business), who respectively met the threshold for reporting under the Australian Modern Slavery Act in Financial Year 2023. The complete list of Australian Sony Reporting Entities covered by this Joint Statement as of March 31, 2024 is set out in the Annex.

Although not all Sony Group<sup>1</sup> companies (“**Sony**”) are subject to the Australian Modern Slavery Act, all Sony companies throughout the world (including the Australian Sony Reporting Entities) are required to comply with applicable Sony global policies and procedures. As such, we make references to actions taken at a global level in this Joint Statement together with additional steps the Australian Sony Reporting Entities have taken in Financial Year 2023. We have also included some information on activities we have undertaken from April 2024 to demonstrate our commitment to continuous improvement.

Our Joint Statement covers all the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. To help prepare this Joint Statement and to more generally inform and guide the steps we are taking and our approach to compliance with the Australian Modern Slavery Act, we have also taken into account the supporting guidance provided by the Australian Government set out in the *Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities* as updated (“**Australian Government Guidance**”) together with the supplementary guidance subsequently released by the Australian Government.

### Our Human Rights Commitment

Slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking, and related forms of workplace abuse. In this Joint Statement, we use the terms “slavery” and “human trafficking” or “**modern slavery**” to include all forms of slavery, servitude and forced or compulsory labour, and human trafficking in a manner consistent with the definition of “modern slavery” in the Australian Modern Slavery Act.

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<sup>1</sup> For this purpose, a Sony Group company is any company where 50% or more of the voting rights are directly or indirectly controlled by Sony Group Corporation.

Globally, Sony is committed to maintaining and improving systems and processes to help identify and address risks of human rights violations related to our business operations and supply chains throughout the world. At a global level, Sony invests significant resources and collaborates with stakeholders, suppliers, and industry associations to develop and implement programs designed to prevent slavery and human trafficking in our business operations and supply chains, particularly in our electronics manufacturing supply chain. Sony uses a risk-based approach that prioritises areas of highest risk, as more fully described in Section 3 of this Statement.

Since the introduction of the Australian Modern Slavery Act, the Australian Sony Reporting Entities have also invested resources to understand the requirements of the Australian Modern Slavery Act and the expectations of the Australian Government as set out in the Australian Government Guidance, as well as considering further guidance issued by the Australian Government. This body of work includes working closely with “Global HQ” stakeholders in Compliance and CSR at Sony Group Corporation on an ongoing basis and refining our approach to addressing this important and complex human rights issue.

Sony’s global, prioritised and risk-based approach aligns with the approach taken by the Australian Government, however, the Australian Sony Reporting Entities have also taken additional steps and measures where required, as set out in this Joint Statement.

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## 2. Mandatory Criterion 2 – Our Structure, Operations and Supply Chains

### Structure

All the Australian Sony Reporting Entities form part of the Sony group. Sony Group Corporation (Organisation number 134 059 582) (“**Sony Group Corporation**” or “**Global HQ**”), incorporated in Japan, is the ultimate parent company for all the Australian Sony Reporting Entities.

The following table describes the structure of the Australian Sony Reporting Entities:

Reporting Entity	Structure
<b>Sony Australia Limited (ACN 001 215 354)</b>	Sony Australia Limited is an Australian public company, limited by shares. It has approximately 228 employees and its registered office is 73 Miller Street, North Sydney NSW 2060. In terms of its corporate structure, it does not control any other entities and its Dutch holding company (Sony Overseas Holding BV) owns 100% of the issued shares in Sony Australia Limited.

<p><b>Sony Music Entertainment Australia Pty Ltd (ACN 107 133 184)</b></p>	<p>Sony Music Entertainment Australia Pty Ltd is an Australian proprietary company, limited by shares. It has approximately 184 employees and its registered office is 100 Harris Street, Pyrmont NSW 2009. In terms of its corporate structure, its immediate parent entity is SBME Holdings (Australia) Pty Limited. It owns and controls some local Australian music businesses.</p>
<p><b>SBME Holdings (Australia) Pty Ltd (ACN 107 132 329)</b></p>	<p>SBME Holdings (Australia) Pty Ltd is an Australian proprietary company, limited by shares. In terms of its corporate structure, its immediate parent entity is Sony Music Entertainment, incorporated in the United States of America and it owns or controls BMG Australia Pty Limited and Sony Music Entertainment Australia Pty Ltd.</p>
<p><b>Sony Interactive Entertainment Australia Pty Ltd (ACN 077 583 183)</b></p>	<p>Sony Interactive Entertainment Australia Pty Ltd is an Australian proprietary company, limited by shares. It has approximately 80 employees with registered office at 64 – 76 Kippax Street, Surry Hills NSW 2010. In terms of its corporate structure, its parent company is Sony Interactive Entertainment Europe Ltd; it is a wholly owned subsidiary of Sony Interactive Entertainment Europe Ltd and it does not control any other entities. Sony Interactive Entertainment Europe Ltd is a wholly owned subsidiary of the Japanese parent company, Sony Interactive Entertainment Inc, who manufacture PlayStation products.</p>
<p><b>Sony Interactive Entertainment Network Europe Ltd (Company number 06020283)</b></p>	<p>Sony Interactive Entertainment Network Europe Ltd is a private company, limited by shares, with a registered office in the United Kingdom. In terms of its corporate structure, its parent company is Sony Interactive Entertainment Europe Ltd; it is a wholly owned subsidiary of Sony Interactive Entertainment Europe Ltd and it does not control any other entities.</p>
<p><b>Sony Music Publishing (Australia) Pty Limited (ACN 080 392 230)</b></p>	<p>Sony Music Publishing (Australia) Pty Limited is an Australian proprietary company, limited by shares. It has approximately 17 employees and its registered office is Suite 1, Level 2, 8 Hercules Street, Surry Hills NSW 2010. In terms of its corporate structure, it is a wholly owned subsidiary of Sony Music Publishing (UK) Limited, a company incorporated in the United Kingdom.</p> <p>Sony Music Publishing (Australia) Pty Limited owns several Australian companies. It also controls two related entities, EMI Songs Australia Pty Limited (ACN 000 063 267) and EMI Catalogue Partnership Australia Pty Limited (ACN 000 381 215), two companies whose parent entities are incorporated in the United States of America.</p>

**Crunchyroll, LLC  
(Delaware  
registration  
number 6551580)**

Crunchyroll, LLC is a limited liability company with its registered office at 3501 Olympus Blvd, Dallas, TX 75019 in the United States. In terms of its corporate structure, it is a joint venture between US-based Sony Pictures Entertainment Inc. and Japan-based Aniplex, a subsidiary of Sony Music Entertainment (Japan), both of which are part of the Sony Group. Crunchyroll, LLC owns or controls several subsidiary companies, three of which are incorporated in Australia and have their registered offices at PKF Melbourne Level 12 440 Collins Street Melbourne VIC 3000.

Crunchyroll, LLC has approximately 1,229 employees globally, and 16 employees based in Australia.

## Operations

To understand the specific operations of the Australian Sony Reporting Entities, it is useful first to understand how Sony operates at the global level. Globally, Sony is engaged in the development, design, manufacture, and sale of various kinds of electronic equipment, instruments and components for consumer, professional and industrial markets such as game hardware, televisions, audio and video recorders and players, still and video cameras, mobile phones, and image sensors (collectively, our “**electronics products**”). Globally, there are 12 Sony-operated manufacturing sites for our electronics products located in Japan, China, South Korea, Thailand, Malaysia, and the UK. Sony also contracts with third parties to manufacture certain electronics products on Sony’s behalf.

In addition to electronics products, Sony is engaged in the development, sales, production, distribution and licensing of game software, content and network services. Sony is also engaged in the development, production, manufacture, and distribution of recorded music and the management and licensing of the words and music of songs as well as the production and distribution of animation titles, including game applications based on animation titles. Sony is also engaged in the production, acquisition and distribution of motion pictures and television programming and the operation of television and digital networks.

The Australian Sony Reporting Entities specifically undertake the following functions, activities and operations:

Reporting Entity	Operations
<p><b>Sony Australia Limited (ACN 001 215 354)</b></p>	<ul style="list-style-type: none"> <li>• Sony Australia Limited is a local sales and marketing company in Australia for electronics manufactured by Sony. It does not manufacture any electronics. Our</li> </ul>

**Sony Music  
Entertainment  
Australia Pty Ltd  
(ACN 107 133  
184)**

core business is divided into consumer products and professional products and solutions.

- Sony Australia Limited's key consumer products are televisions, home theatre and solutions, Blu-ray disc and DVD players, headphones and earphones, MP3 players, wireless speakers, cameras, video cameras and memory cards. These products are sold through a range of retail partners across Australia and also directly through its online store (<https://store.sony.com.au/>) and its retail stores located in Castle Hill, Chatswood and Parramatta (Sydney).
- Sony Australia Limited also provides the Australian market with a range of professional products and solutions for the broadcast and production, sports, entertainment, education, corporate and healthcare sectors. Professional products include studio and broadcast cameras, digital cinema cameras, camcorders, professional monitors and projectors, optical disc archiving, and imaging cameras and monitors.
- Its professional solutions include sports tracking technologies through its Hawk-Eye business across Australia.
- Sony Australia Limited also enters into arrangements with various streaming providers for their streaming platforms to be featured and accessed on the homepage of Sony electronic devices.

- Sony Music Entertainment Australia Pty Ltd is the Australian affiliate of Sony Music Entertainment.
- The principal continuing activities of Sony Music Entertainment Australia Pty Ltd are the sale and licensing of pre-recorded music, compact discs, records, DVDs and associated merchandise and the sale of music via digital channels. In addition, the company is involved in sponsorships and endorsements, concert promotion and talent management.
- Sony Music Entertainment Australia Pty Ltd also:
  - operates a merchandise, licensed product and strategic brand identity business under the brand The Thread Shop, including operating the website [thethreadshop.com](http://thethreadshop.com) in respect of Australia.
  - has played a pioneering role in music history and nurtured some of music's most iconic artists and produced some of the most influential recordings of all time. It supports a diverse roster of superstars, developing and

	<p>independent artists and visionary creators, with a local artist roster consisting of over 40 Australian artists.</p> <ul style="list-style-type: none"> <li>○ is involved in the operations of the local Australian music businesses which it either owns or controls.</li> <li>○ is involved in the promotion of immersive events such as Lightscape, Dark Spectrum and the Jurassic World Exhibition.</li> <li>○ acquired merchandising brand Ceremony of Roses in January 2022, which assists Sony Music Entertainment and its subsidiaries (such as Sony Music Entertainment Australia Pty Ltd) with enhanced global merchandising and brand management operations.</li> </ul>
<p><b>SBME Holdings (Australia) Pty Ltd (ACN 107 132 329)</b></p>	<ul style="list-style-type: none"> <li>● SBME Holdings (Australia) Pty Ltd is the holding company for Sony Music Entertainment Australia Pty Ltd and does not undertake any operations.</li> </ul>
<p><b>Sony Interactive Entertainment Australia Pty Limited (ACN 077 583 183)</b></p>	<ul style="list-style-type: none"> <li>● Sony Interactive Entertainment Australia Pty Limited is a sales and marketing company and the appointed local distributor for electronics manufactured by Sony Interactive Entertainment Inc (and associated subsidiaries). It does not manufacture any products. <ul style="list-style-type: none"> <li>○ Its core business is distributing consumer products, including products marketed under the PlayStation brand.</li> <li>○ Its key consumer products are gaming consoles, videogames and associated peripherals, and accessories.</li> <li>○ These products are sold through a range of retail partners throughout Australia.</li> </ul> </li> </ul>
<p><b>Sony Interactive Entertainment Network Europe Ltd (Company number 06020283)</b></p>	<ul style="list-style-type: none"> <li>● Sony Interactive Entertainment Network Europe Ltd operates the PlayStation online store and sells digital games from that platform to Australian consumers.</li> <li>● Sony Interactive Entertainment Network Europe Ltd also enters into arrangements with various videogame and media service providers for these services to be featured and accessed on the PlayStation interface.</li> </ul>
<p><b>Sony Music Publishing (Australia) Pty Ltd (ACN 080 393 230)</b></p>	<ul style="list-style-type: none"> <li>● Sony Music Publishing (Australia) Pty Ltd is the Australian affiliate of Sony Music Publishing (UK) Limited.</li> <li>● The principal continuing activities of Sony Music Publishing (Australia) Pty Ltd are the acquisition,</li> </ul>



	<p>protection, and administration of copyrights for musical compositions. As part of that process,</p> <ul style="list-style-type: none"> <li>○ it enters into agreements with songwriters to maintain ownership or administration of the respective copyrights.</li> <li>○ it may licence its copyright and digital rights to other Sony Music Publishing companies in the corporate group outside of Australia, for exploitation outside of Australia;</li> <li>○ it licenses copyrights and digital rights, and subsequently performs sub-publishing functions in Australia, for the exploitation of the copyrights owned or administers by other Sony Music Publishing companies in the corporate group outside of Australia; and</li> <li>○ it licences the copyrights which it controls for digital use and for synchronisation use (for use in films, TV shows, Commercials, and on-line campaigns).</li> </ul> <ul style="list-style-type: none"> <li>● Sony Music Publishing (Australia) Pty Ltd also sells sheet music and books which feature its copyrights, primarily for educational purposes.</li> </ul>
<p><b>Crunchyroll, LLC (Delaware registration number 6551580)</b></p>	<ul style="list-style-type: none"> <li>● Crunchyroll, LLC owns and operates an anime entertainment offering including a subscription and ad-supported video on-demand streaming service for anime films and television series. Through its platform, Crunchyroll, LLC also offers Australian consumers digital games and merchandise.</li> <li>● Crunchyroll, LLC also: <ul style="list-style-type: none"> <li>○ hosts live events;</li> <li>○ enters into various licensing arrangements with the owners of anime films, series and games so that it can distribute such content on its platforms, as well as theatrical releases; and</li> <li>○ has Australian subsidiaries which are involved in the acquisition and sale to Australian consumers of physical products, such as DVDs and merchandise.</li> </ul> </li> </ul>

## Supply Chains

The supply chains across the different Australian Sony Reporting Entities are complex and varied. As described below, we have determined that our highest risk supply chain is our electronics products. A high-level summary of our supply chain structure is set out in the table below.

**Global:**

- We acquire our products from our Sony global affiliates who form part of our supply chain for core products such as electronics. Our global affiliates procure materials and component parts for Sony's electronics products from suppliers located throughout the world including, Japan, Asia-Pacific, Europe, and other areas.
- Please see the Responsible Supply Chain Section in our Sustainability Report 2024 for more details available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

**Sony Australia Limited and Sony Interactive Entertainment Australia Pty Limited:**

- Sony Australia Limited imports electronics from Sony Corporation, while Sony Interactive Entertainment Australia Pty Limited acquires electronics in connection with the PlayStation brand (such as gaming consoles and accessories) from Sony Interactive Entertainment Europe Limited. These supply arrangements are long term and secure, given they are intra-group arrangements.

**Sony Music Entertainment Australia Pty Limited:**

- Sony Music Entertainment Australia Pty Limited acquires the rights to audio and audio visual recordings through entering into:
  - recording agreements with music recording artists, where Sony Music Entertainment Australia Pty Limited acquires ownership in the recordings;
  - licence or distribution agreements with artists, where the artist retains ownership and Sony Music Entertainment Australia Pty Limited acquires more limited rights for a fixed period.
  - licence arrangements with other companies in the Sony Music Entertainment corporate group outside of Australia.
- Sony Music Entertainment Australia Pty Limited releases and markets these recordings in Australia via physical formats such as CD and vinyl and via digital formats such as streaming services and downloads. Sony Music Entertainment Australia Pty Limited acquires these products from both local and overseas suppliers (including other global affiliates within the Sony Group).

- For merchandising, Sony Music Entertainment Australia Pty Limited also engages:
  - local Australian fashion and merchandise suppliers for its merchandising division, The Thread Shop. Sony Music Entertainment Australia Pty Limited has conducted further assessment of the supply-chain in connection with The Thread Shop (see Sections 3 and 4 below).
  - Ceremony of Roses, which was acquired by Sony Music Entertainment in January 2022, for merchandising and brand management services.

### **Sony Music Publishing (Australia) Pty Ltd**

- Sony Music Publishing (Australia) Pty Ltd acquires the rights to its local copyrights by entering into publishing agreements with local songwriters where Sony Music Publishing (Australia) Pty Limited either acquires the copyrights or enters an arrangement to administer the copyrights for a fixed term.
- As part of its Print Music business, which involves the sale of sheet music and books, Sony Music Publishing (Australia) Pty Ltd engages:
  - a local manufacturer to print sheet music and books; and
  - a local company to assist it with the sale and distribution of its sheet music and books. This third-party supplier is also responsible for the storage and inventory of Sony Music Publishing (Australia) Pty Ltd's products.

### **Crunchyroll, LLC**

- Crunchyroll, LLC acquires the rights to distribute and stream anime films, television series and games via its streaming platform and in theatrical releases.
- As part of its online platform, Crunchyroll, LLC also has a merchandising and collectibles business and sells products directly to consumers, Crunchyroll, LLC acquires these products from both local and overseas suppliers (including other global affiliates within the Sony Group).

## **Supply chains for other operations**

To support the sale and marketing operations and other activities, the Australian Sony Reporting Entities' supply chain also includes the following:

- logistics services (end to end transportation of Sony products to end consumers, including warehousing);
- sales and marketing (advertising, promotions, merchandise, public relations, social media, retail displays);
- professional services (legal, accounting and tax advice);
- insurance;
- administrative support (such as outsourced accounts receivable/payable functions);
- information technology (IT infrastructure, IT consulting, IT goods and services procurement); and
- facilities management (services for cleaning, repairs and maintenance and day to day business operations).

Generally speaking, our suppliers for the above are based locally in Australia. However:

- some back-end support services, such as IT services, are provided by our global affiliates; and
- a small number of our suppliers are located outside Australia, for example, some of Sony Music Entertainment Australia Pty Limited's merchandise manufacturers are located offshore (including China), Sony Australia Limited's call centre operator is located in the Philippines and Sony Interactive Entertainment Australia Pty Limited also engages suppliers located in the United Kingdom and the Philippines.

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### **3. Mandatory Criterion 3 – Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities and any entities the reporting entity owns or controls**

#### **Globally**

Globally, using a risk-based approach, Sony has prioritised its group-wide efforts to mitigate human rights risks in our electronics products manufacturing supply chains, as also reporting in previous reporting periods.

Sony has worked with Business for Social Responsibility (**BSR**) since 2012 to conduct group wide human rights impact assessments to evaluate risks of slavery and human trafficking in our diverse businesses and supply chains. BSR is an independent, non-profit, global organisation devoted to building a just and sustainable world.

Using information from the BSR risk assessments, our processes and controls, and from NGO reports, it determined that Sony's electronics products manufacturing

business and its supply chain has a higher risk for potential human rights abuses than other Sony business segments or their supply chains.

Globally, in Financial Year 2023, Sony identified the following as a result of the surveys conducted (as set out in Mandatory Criterion 4):

- out of the 235 document-based assessment surveys and 12 remote/onsite assessments and interviews undertaken globally, several plants were identified with minor concerns such as excessive working hours. Sony issued instructions to these suppliers and is monitoring their remedial actions;
- there was no definitive evidence of forced labour assessed at any of the suppliers assessed in Financial Year 2023 and
- Sony did identify areas of non-compliance with the Supply Chain Code, such as employees working more than of 60 hours per week. Sony contacted the relevant suppliers and required them to develop a corrective action plan for each violation and to submit the plan to Sony.

Sony's risks of slavery and human trafficking in our own business operations, including our electronics products manufacturing business, have been mitigated by robust employment policies, training, and other controls.

We utilise a risk-based approach and prioritise our group-wide efforts to mitigate our areas of highest risk which is our electronics products manufacturing business and supply chain. These efforts are described in more detail in this Joint Statement.

## **Locally**

This section outlines the risks the Australian Sony Reporting Entities have identified based on their local risks assessment efforts during previous reporting periods. Each of the Australian Sony Reporting Entities has previously identified priority areas of focus, except for Sony Music Publishing (Australia) Pty Limited and Crunchyroll, LLC which have met the reporting threshold in Financial Year 2023. Both of these new Reporting Entities intend to conduct local supplier risk assessments in future reporting periods.

We confirm that in Financial Year 2023 none of the Australian Sony Reporting Entities identified an instance of modern slavery or found any evidence of forced labour or modern slavery as part of their local processes to assess risks.

*Sony Australia Limited, Sony Music Entertainment Australia Pty Ltd and Sony Interactive Entertainment Australia Pty Limited*

In previous reporting periods, Sony Australia Limited, Sony Music Entertainment Australia Pty Ltd and Sony Interactive Entertainment Australia Pty Limited completed high-level risk assessments of their suppliers to determine which of their respective suppliers were higher risk from a modern slavery perspective.

As a result of these respective risk-assessment exercise, which used the key risk indicators set out in the Government Guidance, the respective Reporting Entities identified the following key potential risks, as described in the table below. In conducting this exercise, the respective Reporting Entities focused on those direct suppliers which they had potential leverage to influence change.

<p><b>Sector and industry risks</b></p>	<p>The respective Reporting Entities all use merchandising and cleaning services suppliers, which are sectors known to have a higher risk of modern slavery as outlined in the Australian Government Guidance.</p> <p>Cleaning and merchandise services are recognised in the Australian Government Guidance as being a high risk industry for modern slavery globally. The nature of cleaning and merchandising services are often unregulated and provided by temporary or contract workers who may be low skilled, low paid or otherwise vulnerable to exploitation. Cleaning and merchandise suppliers may also have higher modern slavery risks as they often involve manual labour and are undertaken at night time or in remote locations.</p> <p>Sony Australia Limited and Sony Music Entertainment Australia Pty Ltd also use suppliers in its electronic business to produce CD and Vinyl formats, we have assessed as not being typically at a higher risk of modern slavery.</p> <p>As part its risk mapping exercises, Sony Australia Limited and Sony Music Entertainment Australia Pty Ltd also identified freight and logistics as a potentially higher risk area.</p>
<p><b>Product and services risks</b></p>	<p>As reported in previous statements:</p> <ul style="list-style-type: none"> <li>○ Sony Music Entertainment Australia Pty Ltd identified merchandising (including for The Thread Shop) and cleaning as representing potentially higher risks for modern slavery.</li> <li>○ Sony Australia Limited identified its risks as electronics (consistent with the Global approach), fashion in relation to its merchandise, cleaning in relation to its office; and</li> <li>○ Sony Interactive Entertainment Australia Pty Ltd identified its risks as fashion in relation to its merchandise, cleaning in relation to its office.</li> </ul> <p>The Reporting Entities recognise that:</p> <ul style="list-style-type: none"> <li>○ cotton used in merchandise represents a potentially high risk input for clothing; and</li> <li>○ cleaning is recognised as a potentially high-risk service.</li> </ul>

## Geographic risks

The respective Reporting Entities:

- generally engage suppliers that work in countries that are in the top 3 bands for government responses to modern slavery according to the Global Slavery Index;
- do not directly engage any suppliers that operate in countries that have a high prevalence of human rights violations; and
- recognize that they may engage suppliers which may use sub-suppliers that operate and source materials from locations which have been identified as higher risk (e.g. Asia).

Where a Reporting Entity has identified that its supplier engages a sub-supplier in a higher risk country, it has taken additional steps to address this. For example, where Sony Interactive Entertainment Australia Pty Limited previously identified this as part of its supplier surveys, its direct supplier asked the relevant sub-suppliers to sign agreements prohibiting the use of modern slavery.

Based on the above risk assessments and taking a prioritised risk-based approach, the respective Reporting Entities are continuing to focus on the following areas for further risk assessment in future reporting periods:

- its cleaning and merchandise suppliers;
- its CD and vinyl manufacturer suppliers; and
- its freight, logistics and music production suppliers.

### *Sony Music Entertainment Australia Pty Ltd*

Having previously identified the risks set out in the table above, Sony Music Entertainment Australia Pty Ltd implemented phase one of its roll out of its supplier surveys, which it commenced in Financial Year 2022.

In Financial Year 2023, as a result of analysing supplier surveys from key suppliers in the clothing and accessory manufacturing sector, it identified that the suppliers surveyed:

- have policies in place to deal with modern slavery, even in circumstances where they were not required to report under modern slavery laws;
- have people dedicated to overseeing modern slavery risks that arise in relation to the goods and services delivered;
- provide training on identification, assessment and how to respond to modern slavery risk; and

- conduct routine internal reviews in relation to child labour, physical abuse or disciplines, threats of abuse, verbal abuse, harassment, other forms of intimidation, discrimination, and violation of employment standards.

None of the suppliers reported that they had received any enquiries from or been the subject of investigations by any governmental organization in relation to allegations of child labour, forced or bonded labour, physical abuse or discipline, threats of abuse, verbal abuse, harassment, other forms of intimidation, discrimination, violation of employment standards or similar issues within their respective organisations or broader supply chains.

One of the suppliers indicated that they had received a report from a third party regarding their employment standards. Sony Music Entertainment Australia Pty Ltd will make further enquiries as to the nature of those reports and, if it has been determined that there is an issue, seek confirmation from the supplier of the steps taken by it to ensure that all employment standards are complied with.

As part of its initial risk assessment, Sony Music Entertainment Australia Pty Ltd also recognised its CD and vinyl manufacturer suppliers; and its freight, logistics and music production suppliers also present some risk. In phase two, Sony Music Entertainment Australia Pty Ltd will also send supplier surveys to its suppliers in these sectors. It will report of the result of supplier surveys received in Financial Year 2024 in the next reporting period.

During this reporting period, Sony Music Entertainment Australia Pty Ltd also extended its current premises lease. As a result, it continues to have limited leverage over its cleaning suppliers. However, Sony Music Entertainment Australia Pty Ltd has made queries to its building management about its cleaning providers in Financial Year 24 and will report on this in the next reporting period. It will also consider the risks in relation to cleaning services when it moves into its permanent office space.

Sony Music Entertainment Australia Pty Ltd will continue to roll out the supplier survey in a phased approach over the next few reporting periods.

#### *Sony Interactive Entertainment Australia Pty Ltd*

Having identified the key potential risks in supply chains and operations described in the table above, Sony Interactive Entertainment Australia Pty Ltd:

- (1) identified which employees would receive priority training covering modern slavery risks in the following Financial Years; and
- (2) which key suppliers will receive supplier surveys in following Financial Years.

In Financial Year 2022, as a result of analysing the issued and prioritised supplier surveys, Sony Interactive Entertainment Australia Pty Ltd identified the following additional detail concerning risks of modern slavery in respect of its key suppliers who



provide merchandising and associated products and services to Sony Interactive Entertainment Australia Pty Ltd:

- smaller suppliers have a lack of resources to fully report on their suppliers; and
- the suppliers surveyed demonstrated an adherence to standards which ensured its partners are long term, reputable, tier one, skilled specialists and noted a chain of responsibility approach.

Sony Interactive Entertainment Australia Pty Ltd will continue to focus on the rollout of surveys to suppliers in the next reporting period.

#### *Sony Music Publishing (Australia) Pty Limited*

As this is the first reporting period in which Sony Music Publishing (Australia) Pty Limited has met the reporting threshold, it has committed to undertaking operational and supplier risk assessments in future reporting periods to identify areas of focus. However, a potential area of focus is its print sheet suppliers.

#### *Crunchyroll, LLC (part of Sony Pictures)*

As this is the first reporting period in which Crunchyroll, LLC has met the reporting threshold, it has committed to undertaking operational and supplier risk assessments in future reporting periods (following training) to identify areas of focus. However, a potential area of focus is its merchandise suppliers.

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#### **4. Mandatory Criterion 4 - Actions taken to assess and address modern slavery and human trafficking risks, including due diligence and remediation processes**

##### **Actions taken at the global level**

Globally, Sony takes humans rights and the management of its supply chain very seriously. Sony's risks of slavery and human trafficking in its business operations have been mitigated by rigorous hiring procedures, and robust employment policies and other controls. We have provided some of the actions Global HQ takes to assess and address modern slavery in its operations and supply chains. For more detailed information, please refer to Sony's 2024 Sustainability Report available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

##### **Sony Group Code of Conduct**

Our commitment to human rights is embedded in the Sony Group Code of Conduct (the "**Code of Conduct**"). The Code of Conduct applies to all Sony directors, officers and employees. The Code of Conduct has been communicated to all Sony personnel, is available at <https://www.sony.net/code/> and has been translated into 22 languages.

The Code of Conduct reflects ethical principles set out in various global guidelines including the following:

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

The Code of Conduct prohibits any form of forced, involuntary or child labour in our operations. It requires all Sony companies to adopt sound labour and employment practices and to treat their employees in accordance with applicable laws. Each Sony company must take appropriate steps to assure compliance with the Code of Conduct, including establishing appropriate disciplinary procedures for violations, which may include termination of employment.

All Sony suppliers and contractors are expected to adhere to Sony’s ethical values and comply with Sony policies concerning compliance with laws, respect for human rights and fair labour and employment practices.

## **Human Rights Policy**

Sony’s commitment to upholding fundamental human rights principles such as the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work (the “**ILO Declaration**”) and to respecting internationally recognized human rights of people potentially affected by Sony’s business operations throughout Sony’s value chain is embedded in the Sony Group Human Rights Policy, effective as of March 29, 2024, available at:

[https://www.sony.com/en/SonyInfo/csr\\_report/humanrights/humanrightspolicy\\_en.pdf](https://www.sony.com/en/SonyInfo/csr_report/humanrights/humanrightspolicy_en.pdf)

The Human Rights Policy applies to all Sony Group companies and also provides an overview of our actions commitments related to human rights-related due diligence, remedies, employee trainings, and other stakeholder engagement.

## **Due Diligence**

1. *Identifying and assessing actual and potential human rights impacts.*

a) *Sony Owned Manufacturing Sites*

Sony owned manufacturing sites are operated by Sony employees, service suppliers and on-site contractors. These sites are required to comply with the standards of the

Code of Conduct and the Sony Supply Chain Code of Conduct (“**Supply Chain Code**”). Sony internal procedures require implementation of an improvement plan in the event of any areas of non-compliance. Assessments and audits to confirm compliance with these standards are an integral part of our processes.

- **Self-assessments:**

All of Sony owned electronics products manufacturing sites conduct an annual self-assessment utilising the Responsible Business Alliance (“**RBA**”) Self Assessment Questionnaire (“**RBA Questionnaire**”) to monitor adherence to the Code of Conduct and the Supply Chain Code. The RBA Questionnaire was completed by all Sony manufacturing sites for Financial Year 2023. The RBA Questionnaire results were reviewed and analysed internally. All Sony owned manufacturing sites were deemed to be low risk.

- **Audits:**

Selected Sony owned manufacturing sites also regularly conduct the RBA Validated Assessment Program (VAP) or equivalent audits.

- **Enhanced Assessments to Determine Labour Conditions for Foreign Workers in Japan:**

In light of recent reports that foreign and immigrant workers are at risk of forced labour conditions throughout the world, including in Japan. Sony also assesses all Sony manufacturing sites located in Japan to determine if the site directly or indirectly employs foreign or immigrant workers. If they do, Sony conducts a survey to determine the actual terms of employment and working conditions for these workers. Since 2020, Sony has also conducted document assessments of on-site subcontractors at a number of manufacturing sites to verify their hiring processes for technical intern trainees in Japan and the countries in which they were hired, as well as the labour conditions of trainees. The results of these surveys and additional document assessments for technical intern trainees show that manufacturing sites in Japan are taking required steps to ensure compliance with the labour standards set out in the Supply Chain Code.

b) Within Our Supply Chain

All new and existing electronics products production suppliers are required to comply with the Supply Chain Code. As explained below, assessments and audits to ensure compliance with the Supply Chain Code are an integral part of our supply chain management.

- **New Suppliers:**

Our global affiliates conduct an initial assessment of all new OEM/ODM suppliers and all new raw materials/ parts suppliers and their manufacturing facilities to determine the suppliers’ risk level. Risk level is based on such factors as the country and region in which they are location, size of the business, industry, and type of business.

Higher risk suppliers are subject to additional, more comprehensive assessments utilising the RBA Questionnaire or a more focused questionnaire developed by Sony ("Sony Questionnaire"). These questionnaires evaluate compliance with the Supply Chain Code, including issues related to forced labour among foreign, migrant and immigrant workers, which has become a serious issue worldwide. Completed questionnaires are analysed to identify potential risks.

- **Existing Suppliers:**

All existing OEM and ODM suppliers that do a sizable business with Sony are subject to annual assessments using the RBA Questionnaire, which were re-issued again in this reporting period. If the assessment indicates a high risk, that OEM or ODM supplier is subject to an on-site audit, which may be conducted by an independent third-party auditor. Sony has also strengthened its activities for existing raw materials / parts suppliers over time. Existing raw materials and parts suppliers, and their manufacturing facilities are regularly categorized by risk level, based on such factors as the country and region in which they are located, size of business, industry, and type of business to determine if they fit criteria for assessment. Higher risk raw materials and parts suppliers must complete an assessment using the RBA questionnaire or the Sony Questionnaire. Their responses are analysed to identify any potential risks.

If Sony does not deal directly with the manufacturing facility, the assessments are conducted through the trading company or manufacturer that is the primary supplier.

If a supplier is suspected of violating the Supply Chain Code, an on-site assessment is conducted, and employees and managers are interviewed in person to verify the suspected violation. If the suspected violation is confirmed, we issue guidance as to how to remedy the violation. We then continue to monitor and evaluate the situation to ensure the violation has been remedied as instructed. Sony's policy is to review its business relationship with a supplier if a serious violation of the Supply Chain Code (such as forced labour, child labour, inhumane working conditions, unlawful discrimination, lack of an emergency and disaster action plan, presence of risks that cause a serious life-threatening accident to a worker, significant environmental pollution issues) were to occur or if a supplier fails to cooperate fully in an investigation or audit.

For higher risk suppliers, Sony uses a third-party auditing company to confirm compliance with the Supply Chain Code. Employee interviews are also included as part of this audit. Employees are required to directly verify whether they are responsible for employment fees, the site's health and safety conditions, and other relevant issues. The audits also include verification of relevant documents related to employment contracts, working hour data, policies and procedures and local health and safety conditions.

- **Assessment Results for New and Existing Suppliers:**

In Financial Year 2023, our global affiliates conducted a total of 235 document-based assessments for new and existing supplier plants. Our global affiliates also conducted remote/on-site assessments and interviews at 12 plants. The results of these assessments are as follows:

- ***New Supplier Plants.*** The document-based assessments identified 5 plants with minor concerns such as excessive working hours. Sony issued instructions to these suppliers and is monitoring their remedial actions. We also conducted remote or on-site assessments at 8 supplier plants suspected to be in violation, pointing out issues and issuing instructions for improvement. In either case, suppliers are asked to plan for improvement, manage progress and show evidence-based results.
- ***Existing Supplier Plants.*** The 179 document-based assessments identified plants with minor concerns such as excessive working hours. Sony issued instructions to these suppliers and is monitoring their remedial actions. We also conducted remote or on-site assessments at 4 supplier plants suspected to be in violation, pointing out issues and issuing instructions for improvement. In either case, suppliers are asked to plan for improvement, manage progress and show evidence-based results.
- There was no definitive evidence of forced labour identified at any of the suppliers assessed in Financial Year 2023. However, our global affiliates did identify areas of noncompliance with the Supply Chain Code, such as employees working more than 60 hours per week. Sony contacted the relevant suppliers and required them to develop a corrective action plan for each violation and to submit the plan to Sony.
- See also page 78 of our Sustainability Report 2024 available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

c) *Incorporating Findings from the Media and NGO Report.*

If an NGO report or other media indicates possible violations of the Supply Chain Code, Sony works with the identified supplier and may request a third-party RBA audit of the supplier's manufacturing site to confirm the accuracy of the report and necessary corrective action.

2. *Integrating our findings across the group and taking appropriate action to address impacts.*

a) ***Supplier Compliance Procedures and Adherence to Our Values***

- **Supply Chain Codes:**

Sony is committed to working with its suppliers and other stakeholders to better understand potential areas of risk and increase transparency. Sony also seeks to use its influence to help mitigate any negative impacts identified.

Sony is a founding member of the RBA, a non-profit coalition comprising electronics, retail, automotive and toy companies committed to supporting the rights and well-being of workers and communities affected by the global supply chain. Sony has adopted the Supply Chain Code for Sony's electronics products suppliers. The Supply Chain Code, which incorporates the RBA Code of Conduct, establishes standards designed to, among other things, ensure that human rights of workers are upheld and that workers are treated with respect and dignity by suppliers. In particular, the Supply Chain Code prohibits the use of forced, bonded or indentured labour, involuntary prison labour, slavery and human trafficking. The provisions of the Supply Chain Code are derived from internationally recognized standards including the OECD Guidelines, Guiding Principles, ILO Declaration, ILO Fundamental Conventions, and UDHR.

The Supply Chain Code is available at:

[https://www.sony.com/en/SonyInfo/csr\\_report/sourcing/Sony\\_Supply\\_Chain\\_CoC\\_E.pdf](https://www.sony.com/en/SonyInfo/csr_report/sourcing/Sony_Supply_Chain_CoC_E.pdf).

Although our global affiliates have assessed the risk of slavery and human trafficking in our recorded music, motion pictures and television businesses as low, Sony is committed to enhancing the Sony Group's responsible supply chain activities in the entertainment industry and has been working to strengthen its supplier program standards for human rights, ethical business practices, safety and environment in our recorded music, motion pictures and television businesses.

Sony Pictures Entertainment established the Code of Conduct for Suppliers to Sony Pictures Entertainment Inc. and Sony Music Entertainment established its Supplier Code of Conduct. These supplier codes of conduct are based on principles similar to those of the Supply Chain Code. Additionally, Sony Interactive Entertainment recently established its Business Principles and is working to raise the standards of all the business partners it works with. These documents are based on principles similar to those of the Supply Chain Code.

The **Code of Conduct** for Suppliers to Sony Pictures Entertainment Inc is available at:

<https://supplier.sonypictures.com/codeofconduct.php>

The **Sony Music Entertainment Supplier Code of Conduct** is available at: <https://supplier.sonymusic.com/>.

The **Sony Interactive Business Principles** is available at: <https://sonyinteractive.com/en/impact/responsible-supply-chain/>.

- **Responsible Sourcing of Minerals:**

As part of its commitment to avoid contributing to environmental concerns, conflicts, or human rights abuses through its sourcing practices, Sony identified certain minerals sourced from high-risk areas ("**High Risk Minerals**") that are essential to the manufacture of electronic products. In addition to the Supply Chain Code, Sony established the Sony Group Policy for Responsible Supply Chain of Minerals. In this Policy, Sony pledges to avoid contributing to conflicts or serious human rights abuses through its sourcing practices, and pledges to refrain from knowingly purchasing any products, components or materials that contain High-Risk Minerals that contribute to conflicts or serious human rights abuses. Sony is also working with its suppliers to address issues related to human rights, labour conditions, health and safety, and environmental protection at High Risk Mineral production sites and in its procurement of these High Risk Minerals.

See more details in page 82 in our Sustainability Report 2024 available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

- **Contract Terms for Electronic Products Suppliers:**

Compliance with the Supply Chain Code is included in contracts signed when Sony begins doing business with electronics product raw materials / parts suppliers. All electronic products raw materials / parts suppliers are provided with the Supply Chain Code upon signing a new contract, and are kept informed of changes through updated documents. Further, Sony regularly reminds suppliers of their responsibilities and obtains declaration of compliance from them.

When starting new business dealings with suppliers, Sony requests compliance with the Supply Chain Code not only from the primary supplier, but also from plants supplying materials and parts to Sony through the primary supplier. Furthermore, if a primary supplier is a trading company, Sony acquires a compliance consent from the parts manufacturer and manufacturing sites through the trading company and confirms that compliance is implemented.

Sony also distributes the Supply Chain Code to our own supply chain, requesting compliance by indirect suppliers through our direct suppliers.

**b) Internal Leadership.**

Sony's, Sustainability Department at Global HQ takes the lead in promoting efforts toward a responsible supply chain in cooperation with procurement and other relevant functions at the corporate head office and within the various business units.

The Sustainability Department is led by the Senior Executive in charge of Sustainability. The Sustainability Department also assesses external trends and communicates with stakeholders, drawing on both to formulate basic company-wide supply chain management policy.

The Senior Executive in charge of Sustainability appoints management in each relevant business unit responsible for overall operational compliance within the business unit, including compliance with the Supply Chain Code, risk assessments, regular monitoring and remedial measures.

The Sustainability Department provides an annual report to the Sony Group Corporation's Board of Directors on all key aspects of Sony's sustainability initiatives including addressing and mitigating the risks of forced labour. The Sustainability Department also provides the Board with quarterly updates on relevant topics. Senior executives and department heads may also provide regular reports to the Board for review, as necessary.

### *3. Tracking our performance by checking the impact we are making.*

Sony issues improvement instructions to any supplier that it suspects of being in violation of the Supply Chain Code and then verifies whether those improvement instructions have been completed as requested. If deficiencies are discovered through third-party audits of a supplier's manufacturing site, Sony requires the supplier to develop an improvement plan and monitors the supplier's performance by conducting follow-up audits.

### *4. Publicly communicating what we are doing.*

Sony publicises its work to address human rights impacts through its Responsible Supply Chain section in our Sustainability Report 2024 at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

### *5. Remediation and Grievance Mechanism*

Sony employees are encouraged to raise any concerns and have multiple channels to do so, including the Sony Ethics & Compliance Hotline which is available in different local languages and staffed by independent third-party operators. Sony protects reporters from retaliation.



Sony also operates the Grievance System for Sony Group Electronics Supply Chain for relevant stakeholders in the electronics supply chain, including manufacturers and suppliers of parts, raw materials, manufacturing equipment, etc., their employees, and other related parties to report violations or possible violations of the Supply Chain Code and the Sony Group Policy for Responsible Supply Chain of Minerals. Submitted grievances are received and investigated by an organization that is not directly involved in the matter.

Sony investigates allegations expeditiously and objectively. If a violation by a supplier is confirmed, Sony requires the supplier to take corrective action. If a supplier refuses to cooperate with the investigation or fails to take requested corrective action, Sony will reconsider the business relationship. If the violation involves an indirect supplier, the relevant Sony affiliate will work with its direct supplier to obtain corrective action from such indirect supplier.

In addition, examples of remedial guidance for violations identified during on-site audits can be found on page 79 in our Sustainability Report 2024 available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

## 6. *Training.*

All Sony employees are required to receive initial and periodic refresher training on the Code of Conduct to help ensure that they understand Sony's commitment to its core ethical values and internal policies.

In Financial Year 2023, all General Managers and above in our electronics manufacturing operations procurement department, received additional training on human rights in the supply chain and Sony's initiatives for sustainability. We also conducted training for all personnel in our procurement department to enable them to better understand Sony Group initiatives aimed at achieving a responsible supply chain. In addition, all personnel who are the contact point for raw materials/parts suppliers received training on the human rights violation risks identified in our supplier assessment and our improvement processes as well as the necessary measures to take if risks materialize.

In Financial Year 2023, we distributed a video to larger raw materials/parts suppliers to deepen their understanding of our policy of sustainable procurement. The video explains Sony's approach to sustainability, our Supply Chain Code of Conduct, and our Responsible Minerals Sourcing Policy. In this video we also request our suppliers' cooperation to help us achieve our goal of sustainable procurement by complying with our requirements.

## **Actions taken at the local level**

This section outlines the additional actions the Australian Sony Reporting Entities have taken to assess and address modern slavery risks, and which supplements the approach taken globally.

**Supplier surveys**

The Sony Australian Reporting Entities have developed a supplier survey consistent with the Australian Government Guidance. The supplier survey has been used as a tool not only to identify risks within the Sony Australian Reporting Entities respective supply chains, but also to understand those risks and how best to mitigate them. The supplier survey requests suppliers to respond to more than 80 detailed questions targeted specifically at addressing modern slavery issues, to allow each Sony Australian Reporting Entities to have a deeper understanding of higher risk supply chains and to understand how each supplier manages and responds to each of the below topics:

- nature of goods and services;
- nature of workforce;
- specific labour risks; and
- risk identification and mitigation.

The implementation of the supplier surveys is an important supplier engagement and education tool which assists to educate suppliers on Sony’s expectations when it comes to modern slavery at the global and local level.

The table below sets out the status of the supplier survey roll-out for each Australian Sony Reporting Entity to date. The Australian Sony Reporting Entities will continue to assess the risk profiles of its suppliers, and issue the supplier survey, as appropriate, taking a prioritized risk-based approach and focusing on the key areas of risk identified by each Australian Sony Reporting Entity.

Once the new Reporting Entities, Crunchyroll, LLC and Sony Music Publishing, have completed a high-level risk assessment of their suppliers, they will consider whether it is appropriate to issue supplier surveys in the future reporting periods.

Australian Sony reporting entity function and activity	Australian Sony reporting entities	Supplier surveys issued and reporting Year	Responses received	Supplier area
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<b>Consumer electronic products and professional electronic products and solutions</b>	Sony Australia Limited	6 (Financial Year 2020)	5 (Financial Year 2020)	Merchandising and associated goods and services.
<b>Sale and licensing of music</b>	Sony Music Entertainment Australia Pty Ltd SBME Holdings (Australia) Pty Ltd	4 (Financial Year 2023)  NOTE: Sony Music Entertainment Australia Pty Ltd intends to send out 3 Supplier Surveys in Financial Year 2024.	3 (Financial Year 2023) 1 (Financial Year 2024)	Manufacturing, merchandising, and cleaning services
<b>Gaming consoles, videogames and associated peripherals and accessories.</b>	Sony Interactive Entertainment Australia Pty Limited  Sony Interactive Entertainment Network Europe Limited	4 (Financial Year 2021)	3 (Financial Year 2021)	Merchandising and associated goods and services.

**Risk Assessments**

In previous reporting periods, Sony Interactive Entertainment Europe Limited (parent company of Sony Interactive Entertainment Australia Pty Limited and Sony Interactive Entertainment Network Europe Limited) performed a human rights impact assessment. This assessment included analysis of Sony Interactive Entertainment Europe Limited’s supply chain management activities and risks in each supplier category. The recommendations from the assessment continue to build on existing efforts at Sony Interactive Entertainment Australia Pty Ltd to mitigate risks of modern slavery in our operations and supply chains.

In Financial Year 2022, Sony Music Entertainment Australia Pty Ltd undertook a high-level risk assessment of its suppliers to determine which high-risk suppliers should be sent supplier surveys as a priority to identify risks in its supply chains. This risk assessment was informed by the modern slaver indicators provided in the Australian

Government Guidance. Based on this assessment, in Financial Year 2023 Sony Music Entertainment Australia Pty Ltd implemented its phased Supplier Survey Rollout in order of risk priority. It will continue to work towards this objective in future reporting periods. The results of the supplier surveys are set out in Section 3 above.

The above approach was also taken by Sony Australia Limited and Sony Interactive Entertainment Australia Pty Limited in previous reporting periods and the outcomes of these risks assessments continue to guide a prioritised risk-based approach.

## **Due Diligence**

In Financial Year 2023 and 2024, Sony Interactive Entertainment Australia Pty Ltd transitioned its customer due diligence to an online platform, improving its ability to track and audit its due diligence process. Sony Interactive Entertainment Australia Pty Ltd intends to launch its Vendor due diligence online platform in Financial Year 24/25.

## **Pre-screening questionnaire**

In Financial Year 2022, Sony Australia Limited developed and implemented pre-screening questionnaires into its supplier onboarding process to screen potential new suppliers for levels of modern slavery risk. The purpose of the pre-screening questionnaire is to identify potential modern slavery risks for new suppliers. This process and questions asked is informed by the Australian Government template Supplier Questionnaire.

## **Contractual clauses**

In previous reporting periods, Sony Australia Limited developed and implemented template modern slavery clauses for its standard supplier contracts and terms and conditions, with a particular focus on suppliers identified as higher risk. The template modern slavery clauses were developed based on the Australian Government's template modern slavery clauses and is a suite of modern slavery clauses that Sony will implement in its supplier agreements, based on the assessed risk level of the supplier. Sony Australia Limited continues to use these contractual clauses in standard supplier contracts and terms and conditions.

## **Training and education of staff**

Locally we continue to build on training and educating our Australian staff.

Early in Financial Year 2024, Sony Interactive Entertainment Australia Limited conducted training for its team. The training covered the following:

- an overview on the nature of modern slavery risks and the importance for Sony Australia Limited;
- the current status of modern slavery laws in Australia and New Zealand and an overview of the specific legal requirements; case studies for group discussion and analysis;

- key Sony corporate policies on managing modern slavery including the Supply Chain Code;
- work that Sony has undertaken locally and globally to combat modern slavery in its operations and supply chains, including contractual standard clauses and supplier surveys; and
- next steps for Sony Interactive Entertainment Australia Limited.

This follows training conducted, and resources provided to employees for education and training purposes, in previous reporting periods by Sony Australia Limited and Sony Music Entertainment Australia Pty Limited.

All Australian Sony Reporting Entities will continue to focus on educating and training staff and stakeholders over the next few reporting years, including in relation to any updates to the Modern Slavery Act as a result of the Australian Government's statutory review. In particular, Sony Music Publishing (Australia) Pty Limited and Crunchyroll, LLC have committed to providing its staff with modern slavery training in Financial Year 2024.

### **Modern slavery incident response plan**

Sony Australia Limited implemented and trained its key staff on its Modern Slavery Incident Response Guide. This guide establishes principles and processes for responding to actual or suspected modern slavery incidents, including:

- assigning responsibility for coordinating the response, and for notifying and consulting other relevant Sony directors and employees; and
- investigating and remediating actual or suspected modern slavery and human trafficking incidents within our operations and supply chain

### **Hotline**

Globally, Sony implemented an internal Sony Ethics and Compliance Hotline. In addition, Sony Interactive Entertainment and Sony Interactive Entertainment Pty Limited also opened this hotline to third parties. The use of the hotline is being promoted through its employment, recruitment and tender processes and on the Sony Interactive Entertainment Global corporate website.

### **Business Principles**

Sony Interactive Entertainment published its [Business Principles](#), which applies to all Sony Interactive Entertainment suppliers, agents, consultants, customers, businesses partners, contractors and their affiliates that are not subject to the Supplier Chain Code of Conduct. The Business Principles set out Sony Interactive Entertainment's expectations, standards and guidelines for doing business with it and on its behalf by Business Partners.

See: [https://sonyinteractive.com/uploads/2023/12/SIE\\_BUSINESS\\_PRINCIPLES\\_12\\_1823.pdf](https://sonyinteractive.com/uploads/2023/12/SIE_BUSINESS_PRINCIPLES_12_1823.pdf)).

Sony Interactive Entertainment Australia Pty Ltd is working over the next reporting period to implement these Business Principles into all new agreements that are not already covered by the Sony Group Supply Chain Code of Conduct.

### **Australian Government Guidance and independent reports**

The Australian Sony Reporting Entities continue to keep informed by considering guidance issued by the Australian Government and independent reports in respect of the Modern Slavery Act. We receive updates from our modern slavery experts who assist to keep us informed of relevant regulatory guidance and market practice.

We are aware that:

- the Australian Government published its *Report of the statutory review of the Modern Slavery Act 2018 (Cth)* (the “**Report**”);
- the Australian Government is in the process of reviewing and responding to the recommendations tabled in the Report to reform the Australian Modern Slavery Act;
- there have been other major developments in this space including the publication of the 2023 Global Slavery Index; and
- in Financial Year 2024, the Australia Government introduced a Bill to establish an Anti-Slavery Commissioner.

We will continue to monitor such developments and aim to report on our progress in future reporting years.

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## **5. Mandatory Criterion 5 - How Sony assesses the effectiveness of its actions to assess and address modern slavery risks**

<b>Globally</b>	<b>Locally</b>
<p>Globally, Sony conducts assessments and audits of its electronics suppliers. Sony tracked overall supplier performance with the Supply Chain Code by comparing the year over year results of the number of assessments using questionnaires, improvements requested, and remote/on-site visits.</p> <p>The Sustainability Department at Global HQ also assesses external trends and communicates with stakeholders to help gauge the effectiveness of actions taken.</p>	<p>In addition to the global measures used to assess the effectiveness of our actions, in line with the Australian Government Guidance on this specific criterion, the Australian Sony Reporting Entities continue to track the specific actions we are taking locally to support our global efforts. This includes:</p> <ul style="list-style-type: none"> <li>• tracking the progress of the roll out of the planned supplier risk assessment surveys conducted by the Australian Sony Reporting Entities; and</li> <li>• tracking the levels of awareness among staff of the Australian Sony Reporting</li> </ul>

Entities by recording who has attended and completed the planned additional modern slavery training

We also note that no incidents of modern slavery were reported to any Australian Sony Reporting Entities in the Financial Year 2023 reporting period.

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## 6. Mandatory Criterion 6 – Our Consultation Process

As this is a Joint Statement we are required to not only describe the consultation with the entities which the Australian Sony Reporting Entities own or control, but also the consultation processes as between the entities providing this Joint Statement. This year, this also included consulting with our newest reporting entities, Sony Music Publishing (Australia) Pty Limited and Crunchyroll, LLC.

Each Australian Sony Reporting Entity appointed a stakeholder to assist with managing compliance activities for the relevant Sony Group Reporting Entity and collaborated to prepare this Joint Statement and feedback was sought from each reporting entity.

Given that Sony is prioritising its electronic manufacturing supply chains in its Group-wide efforts, Sony Australia Limited consulted with the other Australian Sony Reporting Entities and Global HQ, by email communications and discussions between the entities' key stakeholders.

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## 7. Mandatory Criterion 7 – Other Relevant Information

### Looking ahead

In addition to the ongoing global Sony measures, the Australian Sony Reporting Entities aims to undertake the following measures as part of our Financial Year 2024 compliance activities and our commitment to continuous improvement:

Proposed Action	Description
Monitoring changes in the Australian modern slavery regulatory landscape	We will continue to monitor progress of the statutory review of the Modern Slavery Act and the recommendations made by the Australian Government that may be implemented into the Modern Slavery Act. Depending on what recommendations are implemented, we will review and adjust our modern slavery compliance roadmap accordingly.
Analysis of impacts given updates to Global Slavery Index	Given our initial risk assessments were based on the 2018 Global Slavery Index, we aim to consider 2023 Global Slavery index in more detail and consider if we need to adjust our approach (such as targeting additional suppliers). We will also consider how this affects our previously undertaken risk mapping exercises to identify high risk suppliers.
Training	Sony Music Publishing (Australia) Pty Ltd and Crunchyroll, LLC plans on developing and providing its modern slavery training program to its key staff in the next reporting period.
Risk Assessments	<p>Sony Music Publishing (Australia) Pty Limited and Crunchyroll, LLC are aiming in future reporting periods to undertake risk mapping exercises to identify any high risk suppliers.</p> <p>As part of the risk assessment, Sony Music Publishing will focus its efforts on its manufacturing suppliers that assist it to produce Print Sheet music.</p>
Higher risk suppliers	<p>To follow-on from the initial scoping assessment and supplier surveys sent out in previous reporting periods and key issues identified from reviewing completed surveys:</p> <ul style="list-style-type: none"> <li>• Sony Interactive Entertainment Australia Pty Limited will continue to send out supplier surveys to selected suppliers and consider whether it might incorporate the supplier survey into its onboarding/ due diligence process in relation to higher risk services and it will raise awareness within the company more broadly of the modern slavery measures Sony companies in Australia are undertaking and the risks we aim to address.</li> <li>• Sony Music Entertainment Australia Pty Ltd also intends to continue to send out supplier surveys to those suppliers identified as higher risk as a result of the preliminary risk mapping concluded in Financial Year 2022. This will include a phased survey roll out between 2023 to 2026.</li> </ul>



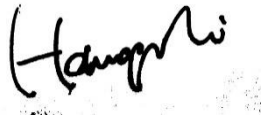
Proposed Action	Description
	<ul style="list-style-type: none"> <li>• Sony Australia Limited will consider whether additional supplier surveys need to be sent to new suppliers assessed as having potential for modern slavery related risks, and if so, it will send further supplier surveys to those suppliers.</li> </ul>

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## Approval of Joint Statement

This Joint Statement has been approved by the Board of Directors for each of the Australian Sony Reporting Entities in accordance with section 14 of the Australian Modern Slavery Act.

- The Board of Sony Australia Limited approved this statement on 19 September 2024;
- The Board of Sony Music Entertainment Australia Pty Ltd approved this statement on 16 September 2024;
- The Board of SBME Holdings (Australia) Pty Ltd approved this statement on 16 September 2024;
- The Board of Sony Interactive Entertainment Australia Pty Limited approved this statement on 18 September 2024;
- The Board of Sony Interactive Entertainment Network Europe Limited approved this statement on 18 September 2024;
- The Board of Sony Music Publishing (Australia) Pty Limited approved this statement on 13 September 2024; and
- The Board of Crunchyroll, LLC approved this statement on 18 September 2024.



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**Tsutomu Hamaguchi**  
Director  
Sony Australia Limited  
Date: 19 September 2024



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**Vanessa Picken**  
CEO/ Director  
Sony Music Entertainment Australia Pty Ltd  
Date: 20 September 2024



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**Vanessa Picken**  
CEO/ Director  
SBME Holdings (Australia) Pty Ltd  
Date: 20 September 2024



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**Rebecca McCormack**  
Director  
Sony Interactive Entertainment Australia Pty  
Limited  
Date: 18 September 2024



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**Rebecca McCormack**  
Director  
Sony Interactive Entertainment Network  
Europe Limited  
Date: 18 September 2024



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**Damian Trotter**

Director

Sony Music Publishing (Australia) Pty Ltd

Date: 13 September 2024



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**Rahul Purini**

Director

Crunchyroll, LLC

Date: 18 September 2024

## **Annex – Reporting Entities**

Sony Australia Limited ACN 001 215 354

Sony Music Entertainment Australia Pty Ltd ACN 107 133 184

SMBE Holdings (Australia) Pty Ltd ACN 107 132 329

Sony Interactive Entertainment Australia Pty Limited ACN 077 583 183

Sony Interactive Entertainment Network Europe Limited Company number 06020283

Sony Music Publishing (Australia) Pty Limited ACN 080 393 230

Crunchyroll, LLC Delaware registration number 6551580

**Sony Joint Modern Slavery Statement - Modern Slavery Act 2018 (Cth)**  
**Summary: Addressing the Mandatory Criteria of the *Modern Slavery Act 2018* (Cth)**

<b>Section of Act</b>	<b>Obligation</b>	<b>Where the obligation is addressed in the Joint Statement</b>
<b>16(1)(a)</b>	<b>Identify the reporting entities</b>	Pages 3 - 4
<b>16(1)(b)</b>	<b>Structure, Operations and Supply Chains</b>	Pages 4 - 12
<b>16(1)(c)</b>	<b>Risks of modern slavery practices in the operations and supply chains of the reporting entities and any entities the reporting entity owns or controls</b>	Pages 12 - 17
<b>16(1)(d)</b>	<b>Actions taken to assess and address modern slavery and human trafficking risks, including due diligence and remediation processes</b>	Pages 17 - 31
<b>16(1)(e)</b>	<b>How Sony assesses the effectiveness of its actions to assess and address modern slavery risks</b>	Page 30
<b>16(1)(f)</b>	<b>Sony's consultation process</b>	Page 31
<b>16(1)(g)</b>	<b>Other relevant information</b>	Page 31 - 32
<b>14(2)(d)(i)</b>	<b>Approval and signing of a joint statement</b>	Page 33 - 35