

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

**Reporting Period: Financial Year 2022  
(1 April 2022 – 31 March 2023)**

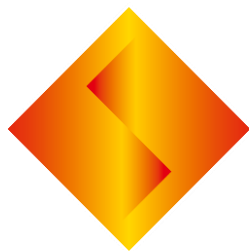
**Reporting Year: 4**

**Submission Date: 28 September 2023**

**SONY**



**SONY MUSIC**



**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) (**Modern Slavery Act**) (collectively referred to as “**Australian Sony Reporting Entities**”).

This is our fourth Joint Modern Slavery Statement under the Modern Slavery Act, covering the reporting period from 1 April 2022 – 31 March 2023 (**Financial Year 2022**).

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 2022 to address the complex issue of modern slavery in our operations and supply chains.

Sony is aware of the human rights impacts of its global business activities. Sony recognizes that respecting human rights throughout Sony’s value chain and addressing any potential human rights risks, whether the relationship with Sony’s business operation is direct or indirect, is a responsibility that a diverse range of stakeholders hold Sony accountable to. Sony has set down its fundamental human rights policy in the Sony Group Code of Conduct, which applies to all of the Australian Sony Reporting Entities and specifies that to respect human rights should be the basic stance of all Sony directors, executives, 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. This includes the Modern Slavery Act currently being under review with the Australian Government publishing its statutory review of the Modern Slavery Act and the Attorney-General’s Department replacing the Australian Border Force as the regulator for modern slavery compliance. 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**”). The list of Australian Sony Reporting Entities covered by this Joint Statement as of March 31, 2023 is available 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 2022 (1 April 2022 – 31 March 2023). Some information on activities in April 2023 and after is also included.

Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. The Australian Sony Reporting Entities note 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. The Australian Sony Reporting Entities have used the Australian Government Guidance 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.

### **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.

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, we invest significant resources and collaborate with stakeholders, suppliers, and industry associations to develop and implement programs designed to prevent slavery and

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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.

human trafficking in our business operations and supply chains, particularly in our electronics manufacturing supply chain. We use 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 Legal, 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, 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 of 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 of the Australian Sony Reporting Entities.

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

Reporting Entity	Structure
<p><b>Sony Australia Limited (ACN 001 215 354)</b></p>	<p>Sony Australia Limited is an Australian public company, limited by shares. It has approximately 267 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>
<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 114 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>

<b>SBME Holdings (Australia) Pty Ltd (ACN 107 132 329)</b>	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.
<b>Sony Interactive Entertainment Australia Pty Ltd (ACN 077 583 183)</b>	Sony Interactive Entertainment Australia Pty Ltd is an Australian proprietary company, limited by shares. It has approximately 79 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.
<b>Sony Interactive Entertainment Network Europe Ltd (Company number 06020283)</b>	Sony Interactive Entertainment Network Europe Ltd is a private company, limited by shares, with a registered office in the UK. 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.

## 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 network services, game hardware and software, 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, 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, and the promotion and implementation of immersive entertainment events. Sony is also engaged in the production, acquisition and distribution of motion pictures and television programming and the operation of television and digital networks. Further, Sony is also engaged in various financial services businesses, including life and non-life insurance operations

through its Japanese insurance subsidiaries and banking operations through a Japanese internet-based banking subsidiary.

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

Reporting Entity	Operations
<p><b>Sony Australia Limited</b> (ACN 001 215 354)</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. We do not manufacture any electronics. Our 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 by Sony Australia Limited through our online store (<a href="https://store.sony.com.au/">https://store.sony.com.au/</a>) and retail stores located in Castle Hill, Chatswood and Parramatta (Sydney).</li> <li>• Sony Australia Limited also provides to the Australian market 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.</li> <li>• Our professional solutions include sports tracking technologies through our HawkEye business across Australia.</li> <li>• 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.</li> </ul>
<p><b>Sony Music Entertainment Australia Pty Ltd</b> (ACN 107 133 184)</p>	<ul style="list-style-type: none"> <li>• Sony Music Entertainment Australia Pty Ltd is the Australian affiliate of Sony Music Entertainment.</li> <li>• 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.</li> <li>• Sony Music Entertainment Australia Pty Ltd also operates a merchandise, licensed product and strategic brand identity</li> </ul>

	<p>business under the brand The Thread Shop, including operating the website thethreadshop.com in respect of Australia.</p> <ul style="list-style-type: none"> <li>• The company 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. The company supports a diverse roster of superstars, developing and independent artists and visionary creators, with a local artist roster consisting of over 40 Australian artists.</li> <li>• Sony Music Entertainment Australia Pty Ltd is also involved in the operations of the local Australian music businesses which it either owns or controls.</li> <li>• Sony Music Entertainment Australia Pty Ltd is also involved in the promotion of immersive events such as Lightscape, Dark Spectrum and the Jurassic World Exhibition.</li> <li>• Sony Music Entertainment also 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 appointed local distributor for electronics manufactured by Sony Interactive Entertainment Inc (and associated subsidiaries). We do not manufacture any products ourselves.</li> <li>• Our core business is consumer products, including products marketed under the PlayStation brand.</li> <li>• Our 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>
<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>

# 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.

<p><b>Supply chains in relation to core Sony products</b></p>	<p><b>Global:</b></p> <ul style="list-style-type: none"><li>• 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.</li><li>• Please see the Responsible Supply Chain Section in our Sustainability Report 2023 for more details available at <a href="https://www.sony.com/en/SonyInfo/csr_report/">https://www.sony.com/en/SonyInfo/csr_report/</a>.</li></ul> <p><b>Sony Australia Limited and Sony Interactive Entertainment Australia Pty Limited:</b></p> <ul style="list-style-type: none"><li>• 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.</li></ul> <p><b>Sony Music Entertainment Australia Pty Limited:</b></p> <ul style="list-style-type: none"><li>• 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, or by entering into licence or distribution agreements with such artists, where the artist retains ownership and Sony Music Entertainment Australia Pty Limited acquires more limited rights for a fixed period.</li><li>• Sony Music Entertainment Australia Pty Limited also obtains the rights to audio and audio visual recordings of international music recording artists through licence arrangements with other companies in the Sony Music Entertainment corporate group outside of Australia.</li><li>• 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). Sony Music Entertainment Australia Pty Limited also engages local Australian fashion and merchandise suppliers for its</li></ul>
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**Supply chains for other operations**

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).

- Sony Music Entertainment Australia Pty Limited also engages Ceremony of Roses, which was acquired by Sony Music Entertainment in January 2022, for merchandising and brand management services.

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, we 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 2022, Sony identified the following as a result of the surveys conducted (as set out in Mandatory Criterion 4):

- out of the 406 surveys undertaken globally, 75 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 Japanese domestic or overseas suppliers assessed in Financial Year 2022; and
- Sony did identify areas of non-compliance with the Supply Chain Code, such as confiscation of passports belonging to foreign workers were being confiscated and 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 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 identified priority areas of focus.

We confirm that in Financial Year 2022 none of the Australian Sony Reporting Entities identified an instance of modern slavery and none of the Australian Sony Reporting Entities found any evidence of forced labour or modern slavery as part of their local processes to assess risks.

*Sony Australia Limited*

As reported in previous statements, Sony Australia Limited has identified its risks as electronics (consistent with the Global approach), fashion in relation to its merchandise, cleaning in relation to its office together with some geographic risks with electronics and fashion sourced from certain Asian countries.

Having previously identified these risks, Sony Australia Limited continues to focus its efforts on these priority areas.

*Sony Music Entertainment Australia Pty Ltd*

In Financial Year 2022, Sony Music Entertainment Australia Pty Ltd completed its high-level risk assessment of its suppliers to determine who its higher risk suppliers are from a modern slavery perspective.

As a result of this risk-assessment exercise, which used the key risk indicators set out in the Government Guidance, the following key potential risks for Sony Music Entertainment Australia Pty Ltd were identified, as described in the table below. In conducting this exercise, Sony Music Entertainment Australia Pty Ltd focused on those direct suppliers where it had potential leverage to influence change.

<b>Sector and industry risks</b>	<p>Sony Music Entertainment Australia Pty Ltd’s business in Australia involves the use of several merchandising (for The Thread Shop and Ceremony of Roses) 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</p>
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	<p>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>During the reporting period, Sony Music Entertainment Australia Pty Ltd moved offices and is leasing its office space on a short term basis until May 2024. Sony Music Entertainment Australia Pty Ltd has limited leverage over the cleaning suppliers used in its office space, however intends to ask targeted modern slavery questions of building management. Sony Music Entertainment Australia Pty Ltd will consider the risks in relation to cleaning services when it moves into its permanent office space.</p> <p>Sony Music Entertainment Australia Pty Ltd also uses suppliers in its electronics business, however, we assess the production of CD and Vinyl format as not being typically at a higher risk of modern slavery.</p> <p>In this risk mapping exercise, we also identified freight and logistics as a potentially higher risk area of our operations.</p>
<p><b>Product and services risks</b></p>	<p>Again, we identified merchandising (including for The Thread Shop) and cleaning as representing potentially higher risks for modern slavery. We recognise that cotton used in merchandise represents a potentially high-risk input for clothing. Additionally, cleaning is recognised as a potentially high-risk service.</p>
<p><b>Geographic risks</b></p>	<p>Sony Music Entertainment Australia Pty Ltd's direct suppliers generally operate in countries that do not have a high prevalence of human rights violations. Sony Music Entertainment Australia Pty Ltd's suppliers all work in countries that are in the top 3 bands for government responses to modern slavery according to the Global Slavery Index. However, Sony Music Entertainment Australia Pty Ltd recognizes that these suppliers may have sub-suppliers in locations which are of higher risk (e.g. China).</p>

Based on the above risk assessment and taking a prioritised risk-based approach, Sony Music Entertainment Australia Pty Ltd is 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 will continue to roll out the supplier survey in a phased approach over the next few reporting periods, which it commenced in Financial Year 2022.

*Sony Interactive Entertainment Australia Pty Ltd*

In previous reporting periods, Sony Interactive Entertainment Australia Pty Ltd also completed an initial scoping exercise to identify key risk areas of potential modern slavery risk in relation to its specific operations and supply chains. Having previously identified these risks, Sony Interactive Entertainment Australia Pty Ltd continues to focus its efforts on these priority areas.

The following key potential risks in the Sony Interactive Entertainment Australia Pty Ltd operations and supply chain were identified:

<b>Sector and industry risks</b>	Sony Interactive Entertainment Australia Pty Ltd’s business in Australia involves the use of several merchandising suppliers, which are sectors known to have a higher risk of modern slavery as outlined in the Australian Government Guidance.
<b>Product and services risks</b>	We identified merchandising as the highest risk for modern slavery in our operations and supply chain. Similar to Sony Music Entertainment Australia Pty Ltd, we have identified that the use of cotton in merchandising supply represents a potentially higher risk input for clothing. We have also identified that the use of cleaning services for our operations is recognised as a potentially high-risk services.

## Geographic risks

We did not identify any of our direct suppliers operating in countries that have a high prevalence of human rights violations. However, we recognise that these suppliers may have sub-suppliers in locations which are of higher risk. For example, our supplier surveys (see section 4 below) have previously identified that one supplier used a sub-supplier based in China to source goods for Sony Interactive Entertainment Australia Pty Ltd. Accordingly, this direct supplier has asked the relevant sub-suppliers to sign agreements prohibiting the use of modern slavery.

Having identified the above key potential risks in supply chains and operations, 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. Modern slavery training was provided to key employees in March 2022. Sony Interactive Entertainment Australia Pty Ltd aims to continue its training program in future reporting periods.

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.

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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 human 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 2023 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, employees and relevant third-party staff. 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 (OECD); Guidelines for Multinational Enterprises;
- The United Nations Global Compact;
- The United Nations Universal Declaration of Human Rights;
- The Guiding Principles on Business and Human Rights; and
- Sustainable Development Goals (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.

## 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 successfully completed by all Sony manufacturing sites for Financial Year 2022. 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 recent years there have been reports that foreign and immigrant workers are at risk of forced labour conditions throughout the world, including in Japan. To mitigate this risk, Sony conducts an assessment of 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 necessary steps to ensure compliance with the labour standards set out in the Supply Chain Code.



## b) 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 a questionnaire developed by RBA. This questionnaire evaluates 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. Considering growing stakeholder interest in the issue of forced labour in the electronics industry supply chain, Sony strengthened its activities for existing raw materials / parts suppliers. Existing raw materials and parts suppliers, and their manufacturing facilities are categorized by risk level, based on such factors as the country and region in which they are located, size of business, industry, and type of business to determine if they fit criteria for assessment. Higher risk raw materials and parts suppliers must complete an assessment focusing on labour issues. 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 manufacturer 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 in Japan, Sony personnel conduct site visits and conduct in-person interviews and remote assessments to confirm compliance with the Supply Chain Code. During employee interviews, Sony confirms working hours, proper payment of overtime, proper workplace conduct, viability of internal reporting systems, and health and safety conditions. For foreign technical intern trainees, we also confirm payment of employment-related fees, working environment, and the habitability of dormitory facilities, including room size.

For higher risk suppliers outside of Japan, 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. Like the RBA VAP audits, 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 2022, our global affiliates conducted a total of 406 document-based assessments using the RBA Questionnaire for new and existing supplier plants. Our global affiliates also conducted remote/on-site assessments and interviews at 64 plants. The results of these assessments are as follows:

- The 406 document-based assessments identified 75 plants with minor concerns such as excessive working hours. Sony issued instructions to these suppliers and is monitoring their remedial actions.
- Sony conducted remote or on-site assessments at 64 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. In addition, remote or on-site assessments and interviews regarding labour, health and safety, environment and ethics were conducted at 19 supplier plants in Japan. We interviewed technical intern trainees to check both working and living conditions, as well as for the payment of brokerage fees to agencies in their home countries.
- There was no definitive evidence of forced labour identified at any of the Japanese domestic or overseas suppliers assessed in Financial Year 2022. However, our global affiliates did identify areas of noncompliance with the Supply Chain Code, such as confiscation of passports belonging to foreign workers were being confiscated and 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 112 of our Sustainability Report 2023 available at [https://www.sony.com/en/SonyInfo/csr\\_report/](https://www.sony.com/en/SonyInfo/csr_report/).

c) Media and NGO Reports.

If a report 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 electronics supply chain and 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 forced, bonded or indentured labour, involuntary prison labour, slavery and human trafficking. 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).

The Supply Chain Code is aligned with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the UN Declaration of Human Rights.

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. We are working to raise awareness of these codes in our entertainment supply chains.

The Code of Conduct for Suppliers to Sony Pictures Entertainment Inc is available at: <https://supplier.sonypictures.com/codeofconduct.php>. in March 2020.

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

- **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 115 in our Sustainability Report 2023 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 suppliers. All electronic products 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.

As a part of the requirements under the Supply Chain Code, suppliers are required to comply with the Green Partner Environmental Quality Approval Program and the Sony Group Policy for Responsible Supply Chain of Minerals.

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 in cooperation with the Compliance Section 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 Administrative office is responsible for overall compliance for suppliers.

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 forced labour and measures adopted to address climate change and other environmental issues. It 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 2023 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 a hotline for external stakeholders to report violations of the Supply Chain Code.

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 112 in our Sustainability Report 2023 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. Our electronics manufacturing operations procurement staff 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.

In Financial Year 2022, we conducted training for all raw material and parts procurement personnel to enable for them to better understand Sony Group initiatives aimed at achieving a responsible supply chain. This training included explanations on the requirements of the Supply Chain Code and Sony's procurement initiatives. We

also implemented training and other cross collaboration initiatives designed to improve procurement personnel knowledge and awareness and promote internal communications and discussions between procurement personnel within Sony regarding sustainable procurement.

**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.

**The supplier survey**

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 current 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.

Australian Sony reporting entity function and activity	Australian Sony reporting entities	Supplier surveys issued and reporting Year	Responses received	Supplier area
<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	Work completed in Financial Year 2022 to identify suppliers who will be part of a phased supplier survey roll out.  The Supplier Survey was finalised with rollout to commence in FY 2023.  NOTE: Sony Music Entertainment Australia Pty Ltd sent out 3 Supplier Surveys in August 2023 and will report on this in our next Joint Statement.		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 slavery indicators provided in the Australian Government Guidance. Based on this assessment, we determined that Sony Music Entertainment Australia Pty Ltd will implement a phased Supplier Survey Rollout in order of risk priority. We continue to work towards this objective in future reporting periods.

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.

### **Pre-screening questionnaire**

Sony Australia Limited also developed pre-screening questionnaires 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**

Sony Australia Limited has 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.

In Financial Year 2022, Sony Australia Limited conducted training for its Australian senior management team and key senior employees. The attendees for Sony Australia Limited covered logistics, marketing, procurement, finance, human resources and facilities teams. These key roles were targeted as they are the roles within the respective entities' which would have exposure and responsibility in identifying and escalating modern slavery risks and incidents. 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; and
- 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.

In Financial Year 2022, Sony Music Entertainment Australia Pty Ltd provided resources to its employees for education and training purposes. This included:

- Sony's Joint Statement for a previous reporting period;
- examples of best practice modern slavery statements published on the modern slavery register;
- examples of poor practice modern slavery statements published on the modern slavery register; and
- media reports on examples of modern slavery on the news.

This education and awareness followed modern slavery training delivered in the previous reporting period.

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.

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

The Sony Australian reporting entities continue to keep informed by considering guidance issued by the Australian Government and independent reports in respect of the Australian 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 Modern Slavery Act is currently under review and Australian Government has recently published its statutory review of the Modern Slavery Act. We are also aware that there have been other major developments in this space including the publication of the 2023 Global Slavery Index. We will continue to monitor such developments and aim to report on our progress in future reporting years.

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

Globally	Locally
<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 Entities by recording who has attended and completed the planned additional modern slavery training</li> </ul>

We also note that no incidents of modern slavery were reported to any Sony Australian Reporting Entities in the FY22 reporting period.

**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.

Each Australian Sony Reporting Entity appointed a stakeholder to assist with managing compliance activities for the relevant Sony Group reporting entity and collaborated in order 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.

## 7. Mandatory Criterion 7 – Other Relevant Information

### Looking ahead

In addition to the ongoing global Sony measures, the Australian Sony Reporting Entities have committed to the following measures as part of our Financial Year 2023 compliance activities and commitment to continuous improvement:

Proposed Action	Description
<b>Monitoring changes in the Australian modern slavery regulatory landscape</b>	We are aware that the Modern Slavery Act is currently under review and Australian Government has recently published its statutory review of the Modern Slavery Act. We will continue to monitor the progress of the review and any of any recommendations 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.
<b>Analysis of impacts given updates to Global Slavery Index</b>	We are also aware that there have been other major developments in the modern slavery space including the publication of the 2023 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).
<b>Training</b>	Sony Interactive Entertainment Australia Pty Limited and Sony Music Entertainment Australia Pty Ltd plan on continuing to build on its training program and provide its key stakeholders with updated training over the next few reporting periods.

## Higher risk suppliers

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, 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 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.

Sony Music Entertainment Australia Pty Ltd 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 out survey roll out between 2023 to 2026.

## Modern slavery incident response plan

During the next reporting period, Sony Australia Limited will aim to develop and implement a modern slavery incident response guide. This guide will establish 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

## Ethics Hotline and Code of Conduct

Sony Interactive Entertainment Australia Pty Limited, in the next reporting period, aims to open the Sony Ethics and Compliance Hotline to all third-parties to ensure modern slavery incidents are quickly identified and mitigated in its operations and supply chains. The use of the hotline will be promoted through the employment and recruitment and tender processes and on the Sony Interactive Entertainment Global corporate website.

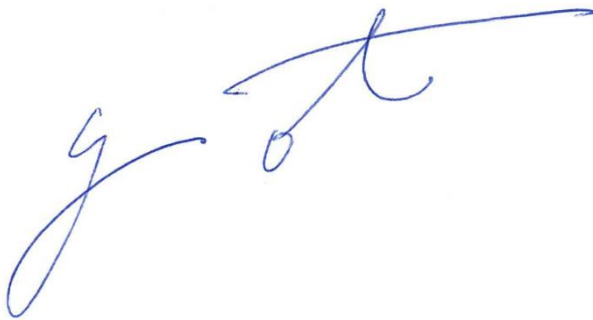
Sony Interactive Entertainment Australia Pty Limited also aims to develop a third-party Code of Conduct over the next reporting period, reflecting principles of ethical and compliant behaviour to be incorporated in all third-party agreements.

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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 25 September 2023;
- The Board of Sony Music Entertainment Australia Pty Ltd approved this statement on 19 September 2023;
- The Board of SBME Holdings (Australia) Pty Ltd approved this statement on 19 September 2023;
- The Board of Sony Interactive Entertainment Australia Pty Limited approved this statement on 26 September 2023; and
- The Board of Sony Interactive Entertainment Network Europe Limited approved this statement on 26 September 2023.



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**Yuzo Otsuki**

Director

Sony Australia Limited

Date: 25 September 2023



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**Vanessa Picken**  
CEO/ Director  
Sony Music Entertainment Australia Pty  
Ltd Date: 25 September 2023



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**Vanessa Picken**  
CEO/ Director  
SBME Holdings (Australia) Pty Ltd  
Date: 25 September 2023



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**Jim Ryan**  
Director  
Sony Interactive Entertainment Australia  
Pty Limited  
Date: 26 September 2023



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**Jim Ryan**  
Director  
Sony Interactive Entertainment  
Network Europe Limited  
Date: 26 September 2023

## **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 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 - 9
<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 10 - 14
<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 14 -26
<b>16(1)(e)</b>	<b>How Sony assesses the effectiveness of its actions to assess and address modern slavery risks</b>	Page 27
<b>16(1)(f)</b>	<b>Sony’s consultation process</b>	Page 27
<b>16(1)(g)</b>	<b>Other relevant information</b>	Page 28
<b>14(2)(d)(i)</b>	<b>Approval and signing of a joint statement</b>	Page 30 -31