



Sony Pictures Networks India Private Limited

(formerly known as Culver Max Entertainment Private Limited)
("SPNI" or the "Company" or "We" or "Our")

Code of Conduct

Document Control and History

Policy	Code of Conduct
Issued By	Legal Department

Version	Date	Change Description	Owner and Prepared By	Reviewed and Approved By
Version 1	Jan 30, 2019	New Document	Rajkumar Bidawatka	Ashok Nambissan
Version 1.1	Aug 29, 2019	Gender Neutral	Rajkumar Bidawatka	Ashok Nambissan
Version 1.2	Jan 09, 2020	Incorporated New Values	Rajkumar Bidawatka	Ashok Nambissan
Version 1.3	Feb 06, 2020	Inserted Drug-Free Workplace Clause	Rajkumar Bidawatka	Ashok Nambissan
Version 1.4	July 01, 2020	Revised Gifts and Entertainment Clause	Rajkumar Bidawatka	Ashok Nambissan
Version 2	Jan 26, 2025	Adoption of SGC COC and revisions to the SPNI COC which shall be supplementary to the SGC COC.	Rajkumar Bidawatka	Ritesh Khosla
Version 2.1	August 15, 2026	Change of Name, Change in Gift Guidelines, Change in Ethics Hotline Number	Rajkumar Bidawatka	Ritesh Khosla

MESSAGE FROM THE MANAGING DIRECTOR AND CEO



Dear Colleagues,

You are aware that SPNI values are an integral part of our Code of Conduct. These values are our guiding light in every decision we make and every action we take.

SPNI has adopted and follows the Sony Group Code of Conduct. This is a supplement Code of Conduct which is a subset of Sony Group Code of Conduct.

The Code of Conduct applies to all employees of the Company, its subsidiaries and affiliates. Failure to abide by these guidelines will lead to disciplinary action including possible termination of employment/engagement, where appropriate.

If you have any questions or concerns about business conduct issues, including possible violations of the Code of Conduct, you should promptly seek the advice of your immediate supervisor, department head, HR manager or the Ombudsperson. The Ombudsperson's role is to understand, address and initiate investigation, for concerns relating to or violations of the Code of Conduct while maintaining employee confidentiality.

The Ombudsperson for the Company is Ritesh Khosla - General Counsel. Employees can reach Ritesh Khosla directly at (Ritesh.Khosla@setindia.com / +91- 22-67081815). You may also contact the Sony Ethics & Compliance Hotline, which is available 24/7 to help you report any concerns regarding unlawful, unethical, or dishonest behavior in the workplace. The Sony Ethics & Compliance Hotline is available directly at <https://sony.alertline.com> or by dialing 0008000820291. Reports to the hotline will not be recorded or traced, and you may choose to remain anonymous. Anyone who comes forward will be treated fairly and respectfully. Sony Pictures will not tolerate any form of retaliation against those who report in good faith. Any employee involved in retaliation will be subject to disciplinary action including possible termination of employment/engagement.

Thank you for helping to preserve our most important asset - 'our reputation'.

Gaurav Banerjee

The Company (includes its subsidiaries and affiliates) has developed this Code of Conduct Supplement to the Sony Group Code of Conduct, to enable employees, to adopt a consistent approach on matters related to professional conduct at workplace and provide clarity on the Company's core values and principles. This Supplement is intended to complement and work in conjunction with the policies and procedures included in the Sony Group Code of Conduct. This Supplement contains many similar rules and requirements that appear in the Sony Group Code of Conduct and also addresses the unique rules and situations facing the Company. Though the rules and requirements set forth in this Supplement focus on activities associated with doing business in India, these policies also apply more broadly to our business relationships globally. **The Sony Group Code of Conduct, together with this Supplement, are hereinafter referred to as “The Code of Conduct.”**

It is the Company's policy to comply with all applicable laws and regulations of the countries and regions in which it operates and conducts its business. All directors, officers and employees have a responsibility and are required to understand and follow the law and internal policy requirements, relevant to their area of work.

All **SPNI** policies are available on [Insight](#).

WHO MUST FOLLOW THE CODE OF CONDUCT

The Code of Conduct is mandatory for all directors, officers, employees and other personnel engaged to work in SPNI office premises (other than temporary and casual workers) (hereinafter referred to as **"Employees"**). All Employees are required to read, understand and acknowledge their commitment to the letter and spirit of the Code of Conduct and also undergo relevant training and refresher courses as and when mandated by the Company.

Adherence to the Code of Conduct and other SPNI policies is a fundamental requirement and integral part of the employment/engagement contract between the Company and relevant stakeholders including third parties who work on our behalf. Employees and relevant stakeholders have a duty to raise a concern and/or report any unethical or illegal conduct.

Any violation of the Code of Conduct is viewed seriously and may lead to disciplinary action including possible termination of employment/engagement.

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1. ORGANIZATIONAL VALUES

Organizational Values describe the core ethics or principles which the Company will abide by and are the thread which unites the Company's core. These values determine the Company's Culture. Ethical business conduct and compliance with applicable laws and regulations are fundamental aspects of our corporate culture. We are committed to upholding the highest professional and ethical standards in everything we do especially the way we conduct our business. We also seek to create a workplace that reflects our following core values.

Think Consumer First	• Proactively Address Consumer Needs • Maintain the Highest Standards of Quality
Be Curious and Insightful	• Have a Learning Mindset • Ask Questions - Probe Deeper • Have an Eye for Detail • Rely on Real-time Insights for Decision Making
Innovate and Move Fast	• Come Up with New Ideas • Do Things Differently • Think Solutions • Take Risks • Work with a Sense of Urgency
Collaborate to Win	• Empower Self and Others • Work Effectively within and Across Teams • Take Accountability
Believe in the Power of Diversity	• Respect All • Be Inclusive • Value Diverse Viewpoints and Ideas
Embrace Sustainability	• Fulfil our Stakeholder Responsibilities through Disciplined Business Practices • Create Long Term Value for all Stakeholders

2. FAIR LABOR AND EMPLOYMENT PRACTICES

2.1 Equal Employment Opportunity /Non-Discrimination

The Company is an equal opportunity employer i.e. employment at/engagement with the Company is based solely on merits, skills and qualifications and is not influenced by race, color, religion, national origin, marital status, gender, sexual orientation, caste, disabilities, political views or age. Employees are treated with dignity. The Company promotes an environment free of harassment whether physical, verbal, psychological or sexual and strives to be an employer of choice by providing a fair work environment which is free from any kind of discrimination and harassment.

2.2 No Forced Labor/ Child Labor

The Company does not use any form of forced or involuntary labor where people are forced to work against their will. The Company does not use "child" labor. The term "child" refers to a person who has not completed fourteen (14) years of age. The Company adheres to all applicable laws and regulations regarding the performance of children on its programs.

2.3 Safe Work Environment

The Company is committed to providing a safe, orderly, inspiring, diverse and tolerant work environment. The Company will not tolerate any form of harassment, including bullying, hate speech, bigotry, intolerant remarks on LGBTQ+ communities (Lesbian, Gay, Bisexual, Transgender and Queer) or other behaviors that create a hostile work environment. Employees are required to be courteous and respectful of individual sensitivities while communicating with others and not use abusive or disrespectful forms of communication including email communications.

Drug-Free Workplace: The possession, use and consumption of narcotic drugs and psychotropic substances is prohibited under the Narcotic Drugs and Psychotropic Substances Act, 1985. Employees should not possess, consume or be under the influence of any narcotic drug or psychotropic substance while at work. Employees should not come to work when their faculties are impaired by the consumption of any such drug or substance or while in possession of such drugs or substances without their physician's written authorization. These rules apply with equal force when employees conduct the Company's business outside the workplace. Employees may consume alcohol responsibly and in moderation at social gatherings, functions and other occasions in connection with the Company's work or at events hosted or sponsored by the Company, except on those days when or in those states where alcohol consumption is prohibited. Should there be reason to believe that an Employee's job performance is being negatively affected by alcohol or illegal drugs, or that this Code of Conduct is being violated in any way, the Company is entitled to inquire as to the nature of the problem and to take appropriate action, which may include disciplinary action. The Company will differentiate between behavior that is properly characterized as an illness or disability and behavior that is not, in accordance with applicable laws.

2.4 Prevention of Sexual Harassment

The Company does not tolerate any kind of sexual harassment including discrimination, subtle or quid-pro-quo or otherwise, at the workplace or with other colleagues and stakeholders and violators will be subject to disciplinary action. The Company has formulated a Prevention of Sexual Harassment Policy ("**POSH Policy**") in accordance with the laws applicable in India, which lays down the procedure for making and responding to any complaint of sexual harassment at the workplace. Employees are requested to read, understand and follow the POSH Policy on dealing with sexual harassment and immediately report any instances of sexual harassment to the Internal Committee ("IC") or write at POSH@setindia.com.

2.5 Health, Safety and Welfare of Employees

The Company is committed to ensure the health, safety and welfare of its employees at the workplace including conducting health care/wellness camps, sports activity, conducting social and educational awareness, etc.

2.6 **Respect Human Rights**

The Company believes that all human beings should be treated with dignity and respect. Our Company respects the internationally recognized human rights of all people throughout our value chain. We strive to avoid any adverse human rights impact from our business operations, services and/or business relationships, and to act diligently to help remediate any impact that may occur.

3. **PROTECTION OF INTELLECTUAL PROPERTY AND COMPANY ASSETS**

3.1 **Intellectual Property**

The term "**Intellectual Property**" shall include without limitation, any patent, discovery or inventions (whether patentable or not), designs and design rights (registered or unregistered and whether registrable or otherwise or goodwill vesting therein), copyright and copyrightable works, computer software programs (including source code and object code), data, data bases and documentation thereof or relating thereto, trade mark, trade dress, logo, device mark, know-how (including production processes and techniques, if any), trade secrets and other confidential information (including ideas, formulas, improvements, enhancement, know-how, methods, techniques, R&D, specifications, drawings, flowcharts, programmer notes, analyses, developments, plans, business plans, proposals, strategies, technical data, business process information, financial and marketing plans, sales history, and customer and supplier lists and information, compilations or summaries thereof), with the right to exercise the rights in the above in any mode or medium, whether now known or later developed.

The Company's intellectual property is one of its most valuable assets and it differentiates the Company from its competitors. The Company takes steps to ensure that its intellectual property is protected and initiates action against any violations by any third party. Similarly, the Company ensures that the intellectual property of any third party is not being used without proper authorization and appropriate written agreements. The Company will not knowingly misuse the intellectual property of third parties or violate their intellectual property. Employees need to be aware that any such violation may result in liability to the Company.

An Employee shall not divulge to any third party, any Intellectual Property of the Company, without the express written consent of the Company. The ownership of any work product (along with the underlying Intellectual Property) developed by an Employee during the term of his/her employment or with material made available to an Employee during the course of their employment ("**Work Product**"), shall vest solely and exclusively with the Company. In case the ownership of any such Work Product does not automatically vest with the Company by operation of law, each Employee hereby irrevocably, perpetually, exclusively and on a world-wide basis, assigns to the Company any and all right, title and interest in and to the Work Product (along with the underlying Intellectual Property). Each Employee hereby also perpetually waives any rights which are not assignable under the applicable law, including moral rights or similarly situated rights in part or whole of the Work Product. Any non-use of such Work Product, for any duration of time, shall not result in the lapse of the rights granted herein. An Employee shall not challenge the right of the Company in such Work Product at any time in any part of the world. The Company shall have the sole and exclusive right to seek statutory protection for the Work Product, anywhere in the world, and in its name. Each Employee undertakes to execute all such documents, deeds, forms etc., as may be required by the Company to ensure that the full right, title and interest, in and to the Work Product vests with the Company. No Employee should incorporate any third-party material in the Work Product or any other Intellectual Property of the Company, without the prior written consent of the Company.

3.2 **Company Assets**

The Company's assets such as laptops, desktops, its Intellectual Property including the Company's brand, copyright, trademark, know-how, creations, marketing programs, confidential or proprietary information, financial information, logo, information systems, etc. are to be used only for legitimate business purposes. All materials, including computer software used by the Company must be legally licensed for use by the Company and its employees.

Copyright laws and the Company's policy prohibit individuals from making copies of software programs they use at work for their personal use, distribution or use and display of a copyrighted work without the prior permission of the copyright owner. The restriction also applies to software and written material and extends to making derivative works or compilations of any copyrighted material. Employees must not use their office computer and laptop to stream, download or store content that is obscene, illegal or that infringes third party copyright. The Company reserves the right to monitor and inspect how its assets are used by its employees, including inspection of e-mail, voicemail, data and files kept on computers or other network terminals, as well as desks, file cabinets, lockers or offices.

3.3 Privacy of Personal Information

The Company has a commitment to ensure the privacy of personally identifiable information received from employees, vendors, customers, contestants and others. The use of information is briefly provided below:

- 3.3.1 **Employee Privacy:** The Company maintains information of its employees during the normal course of business including information regarding their attendance at work- and work-related purposes. The Company's record-keeping practices are reviewed periodically to ensure that they are ethical and in accordance with local laws and regulations. Information and details of employees are kept confidential and access to it, is strictly limited to those who need it for official purposes only.
- 3.3.2 **Third Party Privacy:** Information shared with the Company by the vendors, suppliers, clients, contestants, etc., during the course of normal business transaction is confidential and must be seen and/or used only by employees with a legitimate need to access it. Information will be disclosed outside the organization only if required by applicable laws and after proper authorization.
- 3.3.3 **Discussing details of one's emoluments:** Employees are expected not to discuss the details of their salary, perks or other benefits with their colleagues or any other organization/person without a valid and legitimate need. Breach of this rule can result in disciplinary action including possible termination of employment/engagement.

3.4 Information Security

The Company recognizes the importance of information security both in achieving financial success and maintaining the trust of its stakeholders and has established [Information Security Policies and procedures](#) to help protect its information resources and information systems from unauthorized access or leakage, falsification, loss, destruction or other security risks.

Effective security is a team effort requiring the participation and support of every employee and affiliate who uses the Company's information resources and/or systems.

4 FAIR BUSINESS PRACTICES

4.1 Fair Competition

The Company complies with applicable antitrust, competition and fair practices whilst conducting business. It promotes consumer welfare and efficient allocation of resources by prohibiting agreements and practices, restricting competition. Interaction with competitors presents the greatest risks under competition laws. Disclosure of any non-public information such as prices, volume of sales/production, marketing strategy etc. to competitors/ can be viewed as competitively sensitive and even suspicion of violation may lead to investigation and media exposure.

4.2 Trade Control

The Company complies with the applicable trade control laws and regulations. These laws and regulations prohibit or restrict transactions with certain countries, individuals or entities to secure international peace and security. Employees must know and comply with those laws and regulations

including internal rules and policies relevant to their area of work.

4.3 **Advertising and Marketing**

The Company does not engage in false or misleading advertising or advertising that slanders others. Whenever referencing a competitor or its products or services the Company ensures that the comparison can be substantiated and that the statement is complete, accurate and not misleading.

4.4 **Customer, Vendor and Supplier Relationships**

The Company maintains its relationships with customers, suppliers and vendors which are lawful, efficient and based on fair practices and expects the same from them. The Company strives to ensure that all transactions with customers, suppliers and vendors are based on parameters such as price, quality, service capabilities, technical superiority, track record etc. that are internally determined which are transparent and subject to both internal as well as external scrutiny. The Company's interests in any business transaction must be placed ahead of any personal interests. The Company expects its suppliers, vendors and contractors to adhere to the Company's ethical values and comply with applicable policies of the Company. They are also required to read and affirm that they have read the Company's Supplier Code of Conduct which is accessible [here](#).

4.5 **Anti-Corruption**

The Company prohibits corrupt practices in any form, including bribery, kickbacks, other unlawful payments either to the public (government) and/or the private (commercial) sectors.

4.5.1 **Anti-Bribery**

The Company ensures adherence to applicable laws related to anti-bribery at all its locations. Following are some of the laws on the topic and employees are required to ensure compliance:

- ✓ **India's Prevention of Corruption Act ("PCA")** prohibits giving or offering to give bribes (or any undue advantage) in any form, whether in cash or kind, to Government Officials or to any private entity or to any individual to induce Government Officials to perform a public duty improperly or to reward Government Officials for the improper performance of a public duty. It also prohibits people associated with the Company (i.e. people performing services for or on behalf of the Company, such as its agents) from engaging in corrupt conduct. Under the PCA, Government Officials are also prohibited from accepting any gratification other than legal remuneration in respect of an official act.
- ✓ **US Foreign Corrupt Practices Act ("FCPA")** contains several prohibitions, including the making or offering a payment or something of value (bribe) in any manner (be it cash or in kind) to any government official and/or any representative of a government organization for the purpose of influencing any action that can result in the Company obtaining favorable treatment or lead to improper accounting of the Company's funds.

In addition to the Company's aforesaid policy on Anti-Bribery, there is a Sony Group ("Sony") Anti-Bribery Policy (**"Sony Group Anti-Bribery Policy"**), employees are required to read, understand and ensure compliance with the said Policy. Laws are different in different countries. In case the standards of compliance under applicable laws are at variance with the Sony Group Anti-Bribery Policy and/or The Company's Code of Conduct, employees are required to follow the one which prescribes a higher standard of compliance.

4.5.2 Gifts and Entertainment

4.5.2.1 Employees should neither receive nor offer or make, directly or indirectly, actively or passively, any illegal payment, gift, entertainment, donation or comparable benefit, which is intended to or perceived to, obtain business or influence decisions in favor of the Company or obtain undue advantages in relation to conduct of the Company's business

4.5.2.2 Gifts may be given or accepted only when they meet all the following criteria:

- ✓ Are consistent with customary business practices (with the caveat that merely because giving a gift is a customary business practice does not make it automatically appropriate for the Company to give it), and due regard should be given to other guidelines relating to its propriety.
- ✓ Are not given to a government employee or organization.
- ✓ Are not excessive in value for a non-government employee or non-government organization and are not likely under the relevant circumstances to be interpreted as a bribe or payoff.
- ✓ Are not in the form of cash or its equivalent (e.g. stock, bonds, bullion, precious metals or other negotiable instruments);
- ✓ Are not in violation of any laws, the applicable policies of the Company, or known company policies of the third-party recipient; and
- ✓ Are such that public disclosure of the gift would not reflect negatively upon or embarrass the Company or the Employee, or make it appear that the recipient's judgment would be compromised.

4.5.2.3 Non-Government:

a. Giving of Gifts to Non-government Person up to INR 20,000.

Employees, with the approval of their Department Head, may give customary gifts (e.g. gift packs, dry fruits, sweets, etc.) or Company branded mugs, merchandise, etc., during festive occasions like Diwali, Eid, Christmas, New Year or gifts that are of commemorative nature for special events like an anniversary or the completion of a project milestone (each a **"Bonafide Reason"**) to a non-government person. Where multiple gifts for Bonafide Reasons over the course of a given financial year are given to the same non-government person, the value of such gifts shall not exceed Rupees twenty thousand only (INR 20,000) in the aggregate per annum. Gifting cash or cash equivalent (like vouchers, gift cards, etc.) are strictly prohibited.

b. Giving of Gifts to Non-government Person Exceeding INR 20,000.

If the value of the gifts to be given for Bonafide Reasons to a non-government person, in a given financial year, exceeds the stipulated amount of Rupees twenty thousand only (INR 20,000), then, such gifts must be purchased and given only after obtaining prior written approval from the Department Head, the Chief Financial Officer and the General Counsel. Gifting cash or cash equivalent (like vouchers, gift cards, etc.) are strictly prohibited

c. Business Promotion and Marketing Expenses

Approval as required under the Chart of Financial Authority (COFA) must be obtained for all non-government business promotion and marketing expenses as per the limits stipulated therein.

For clarity, any and all business promotions involving or with a government entity shall be approved by SPE and no such business promotion shall either be committed, commenced or incurred without obtaining such SPE approval. Gifting cash or cash equivalent (like vouchers, gift cards, etc.) are strictly prohibited

d. Receiving Gifts

Details of gifts and/or entertainment received by a Company employee from a third party which is or was or is likely to be associated with the Company (non-exhaustive examples of which include a vendor, producer, designer, agency, etc.) must be reported to the General Counsel and the Chief Financial Officer, in case the aggregate value of such gifts and/or entertainment received (in the best possible estimate of employee receiving such gifts and/or entertainment) is in excess of Rupees twenty thousand only (INR 20,000) per third party in a given year.

4.5.2.4 Government Official:

No Benefit, in any form whatsoever, regardless of the value of such Benefit and no matter how nominal it may be, can be given to Government Officials without following the process laid down herein.

“Benefit” means a gift, entertainment or anything of value and a non-exhaustive list of a Benefit includes, without limitation, studio visit; meet and greet with talent, star or celebrities; internship opportunity at the Company, planned or unplanned meal with Government Official; tickets to a show, concert or likewise; travel sponsorship; invitation to company events; contribution to a charity, facilitation or speed payment professional training, loans, employment etc.

“Government Official” means any person paid with government funds or who serves in a public function. This includes (i) anyone who works for a local, state/provincial or national government, or a public international organization (e.g., the World Bank and the International Monetary Fund); (ii) a political party official or a candidate for political or judicial office; (iii) an employee or official of an entity owned, controlled and/or funded by the government.

A non-exhaustive list of Government and Government Officials include, without limitation, Ministry of Information and Broadcasting, Doordarshan, Life Insurance Corporation of India (LIC), Hockey India, BBC, Brihan Mumbai Municipal Corporation, Central Board for Film Certification (CBFC), State Bank of India, All India Football Federation, Income Tax department, Employees Provident Fund Organisation (EPFO) etc.

If there are occasions or circumstances that require an employee to give any Benefit(s) to a Government Official, it would require prior written approval from Sony Pictures Entertainment, Inc. (SPE) irrespective of value of such Benefit.

Accordingly, Employees are required to submit any such request to the Legal Compliance Team for initiating the approval process. Such requests are not likely to be approved unless there are cogent reasons provided in the approval request for proposing to provide the Benefit to a Government Official and a sufficient lead time is required for the approval or disapproval of such requests.

Under no circumstances may Benefit be offered, purchases or given before receipt of the approval from SPE and communicated in writing to the relevant employee.

4.5.3 Dealing with Government Officials

During the course of its business, the Company may deal with government {local, state or central}, semi-government and quasi-government agencies. During such dealings employees must comply with the norms prescribed by such government agencies for doing business with them and not offer or make any payment to them or to their representatives, directly or through intermediaries, to obtain any favorable performance of official duties. Only certain individuals designated by the Company are authorized to deal with the government and express the Company's views on legislations, regulations, government actions, notices, etc.

4.5.4 Political non-alignment

The Company does not offer or give Company funds or property as donations, directly or indirectly, to any political party, candidate or political campaign.

5 **RESPONSIBLE BUSINESS CONDUCT**

5.1 **Sound Decision Making**

The Company takes business decisions on an informed basis, in good faith, and in the honest belief that the actions are in the best interest of the Company. Employees are required to ensure that the decisions satisfy at least the following preconditions:

- ✓ No violation of any applicable law, regulation or internal rule or policy;
- ✓ No personal interest or self-dealing;
- ✓ It is made within individual authority levels given by the Company;
- ✓ It is made with due care following a reasonable effort to become familiar with the relevant and available facts; and
- ✓ It is made in good faith on a reasonable belief that the best interest of the Company is served.

5.2 **Public Representation of the Company**

In all public engagements with respect to disclosing business information to the media and financial community, the Company follows one-voice policy. Only specifically authorized employees can represent and disclose such information on behalf of the Company. All external and internal communication should reflect a positive image of the Company. Employees are required not to initiate contact with the media with respect to the Company matters. If contacted by the media, employees are required to immediately refer the contact to the Corporate Communications Department.

5.3 **Social Media Responsibility**

Any social media account created by an employee or any agency at the instruction of an employee for the business of the Company shall be in the name of the Company and/or its affiliates or in the name of any of its shows or channels and its ownership shall belong to the Company at all times. Any such social media accounts shall be created only after obtaining prior written approval from the concerned department head and in compliance with the applicable policy on social media. While expressing views or opinions on social media, employees shall not -disparage or demean or defame the Company, any employee or stakeholder of the Company.

5.4 **Recording and Reporting of Information**

The Company ensures that all its records and reporting of information, including but not limited to books and other financial records, are accurate, complete, honest, provided in a timely manner and are a fair representation of facts. The Company follows prudent financial accounting norms as per applicable laws, government regulations and/or notifications issued by the Institute of Chartered Accountants of India/National Financial Reporting Authority and complies with applicable accounting and financial disclosure norms. Deviations, if any, are clearly highlighted and adequately explained. The knowledge or act of deliberate falsification of any financial reports or records may be the basis for disciplinary action including possible termination of employment/engagement and may subject an employee to civil and criminal actions as well. Dishonest reporting of information including false, misleading or artificial entries in the Company's books and records that may serve as the basis for such reports, is strictly prohibited.

5.5 **Investigation**

An employee is required to cooperate fully with any appropriately authorized internal or external investigation, including but not limited to those involving ethical issues, violation of laws, or complaints of discrimination or harassment. An employee should never withhold, tamper with or fail to communicate relevant information in connection with an investigation. In addition, an employee is expected to maintain and safeguard the confidentiality of an investigation to the extent possible. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators, or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and may also be a criminal act that can result in severe penalties.

As a part of any investigation exercise, the Company shall have the right to require an employee to handover the Company devices in their possession i.e. any phone, tablet, or laptop etc., for forensic investigation. As part of this Code, all employees understand that this may lead to access of any personal data or sensitive information stored in such devices.

The use of the information stored on these devices shall be strictly for the purposes of any such investigation and in accordance with the applicable security standards. For this, the information may also be stored on computer systems of the Company within or outside India or may be transferred to professional advisors of the Company within or outside India. The Company and its professional advisors shall also maintain the appropriate security practices and procedures for ensuring data protection in line with the applicable laws.

5.6 Tax Compliance

The Company complies with applicable tax laws and regulations thereunder. The employees must comply with those laws and regulations applicable to their role/function.

6 ETHICAL PERSONAL CONDUCT

6.1 Insider Information and Money laundering

Information such as acquisition of business, financial information, asset revaluations, investment plans, restructuring plans, major agreements, raising of finances, etc. shall be considered as 'Insider Information'. Any use of Insider Information whether electronically disseminated or not, which is not within the public domain, to gain an unfair advantage that may result in a monetary gain to any individual, group of individuals or any third-party is strictly prohibited.

Money laundering includes directly or indirectly attempting to indulge or knowingly assisting or knowingly being a party or actually being involved in any process or activity connected with the proceeds of crime including its concealment, possession, acquisition or use and projecting or claiming it as untainted property, and such activities may attract penal provisions of applicable laws. Monetary transactions should be undertaken by way of electronic transfer to the beneficiary's designated bank account, cheques, demand drafts and other legal instruments of payments, so that sources of origin can be traced at any time.

6.2 Personal Conflicts of Interest

A conflict of interest, actual or potential, may arise directly or indirectly, when an employee:

- ✓ engages in any business activity which is outside the purview of the employee's employment contract or terms of engagement with the Company.
- ✓ is in a position to derive a personal benefit (or for the benefit of employee's relatives) by making or influencing decisions relating to any transaction; OR
- ✓ cannot exercise independent judgment in the Company's best interest.

Employees are required to immediately disclose any conflict and may do so by submitting the [Conflict of Interest Disclosure Form](#). Additionally, depending on an employee's role and designation the employee may be required to annually fill and submit a detailed Conflict of Interest Form, as required by the Company. Based on the disclosure, the Company reserves the right in its sole discretion to take appropriate action including but not limited to reassignment of roles within the Company or separation of the concerned employees, if necessary.

If an employee fails to make a disclosure of a Conflict of Interest that ought to have been disclosed, the Company will take appropriate disciplinary action against such employee, including termination of services.

Outside Activities

Unless the Company otherwise consents at its sole discretion, a whole-time employee of the Company will devote her/his entire resources, full and undivided attention exclusively to the business of the Company during the term of her/his employment with the Company and shall not accept any other employment or engagement (honorary or otherwise).

6.3 Sustainability and Corporate Social Responsibility

The Company recognizes the importance of preserving the environment and creating and sustaining the quality of life for humanity and future generations. The Company continually seeks to minimize the environmental impact of its services and operations. The Company endeavors to evaluate and implement programs that meet or exceed legal requirements and consider environmental impact a fundamental criterion when evaluating projects or operations.

Corporate Social Responsibility ("CSR"): The Company as a responsible organization, under its CSR initiative contributes to the greater common good of the community and society, and helps build a sustainable way of life for marginalized sections of the society. The Company strives to allocate its CSR funds as per the extant CSR Policy.

7 RESPONSIBILITY OF EVERYONE OF US

7.1 Raising Concerns/ Reporting

Speaking up is not always easy, but when we raise concerns, we protect the Company and our colleagues from harm. If we think that any employee may have engaged in unethical or illegal conduct, employees have a duty to their colleagues and to the Company to promptly report such conduct.

The Company has many resources where employees may raise concerns or report any possible violations of the law or of the Code of Conduct. Employees may do so with any of:

- ✓ Write directly to the General Counsel and Ombudsperson, Ritesh Khosla
Ritesh.Khosla@setindia.com
- ✓ Speak or write to function/department head or the CHRO.
- ✓ Drop a note in My Voice Box (anonymous) or send an email to myvoice@setindia.com
- ✓ Call the Sony Ethics & Compliance Hotline at 0008000820291 (anonymous)
- ✓ Access the Sony Ethics & Compliance Hotline via the internet @www.sony.alertline.com

Sony Ethics and Compliance Hotline ("Hotline"): The Hotline is available to all the employees as a resource to report concerns or seek guidance about possible violations of the Code of Conduct. The Hotline is maintained by an independent third party with specially trained operators and broad language capability and is accessible at all times, day or night, via telephone or internet. All information provided to the Hotline is handled confidentially to the extent allowed by local law. Please refer to the frequently asked questions on [Sony Ethics and Compliance Hotline](#)

7.2 No-Retaliation

The Company does not allow any form of retaliation against anyone for raising a concern and/or making a good faith report and/or for participating in an investigation. Anyone who raises a concern and/or makes a good faith report, will be treated fairly and respectfully.



SONY GROUP CODE OF CONDUCT

SONY GROUP CODE OF CONDUCT

Mission

A company that inspires and fulfills your curiosity.

Vision

Using our unlimited passion for technology, content and services
to deliver groundbreaking new excitement and entertainment,
as only Sony can.

Kenichiro Yoshida
President and CEO
Sony Corporation



The Sony Group Code of Conduct serves as our guide to ethical and responsible business conduct as we work together to fulfill Sony's Mission and Vision.

At Sony, employees engage in globally diverse businesses and enthusiastically collaborate using their unique talents and skills. Through innovation and creativity, all employees support Sony in continually taking on new challenges. As a member of Sony, each one of us must be familiar with our Code.

Living up to the values and high ethical standards embedded in our Code is essential for Sony to be trusted by our customers, business partners and the public, thus allowing Sony to contribute to a brighter future by creating excitement and entertainment for the next generation.

Following our Code promotes self-improvement and sustains Sony's growth. Let's make our Code a living, breathing standard of our daily behavior.

Natsuko Takei
Corporate Executive
Senior General Manager
Legal & Compliance Department
Sony Corporation



“Does this contribute to a better future for Sony and a better future for our society?”

That is what we should ask ourselves during the course of our duties.

That is also the basis of the Sony Group Code of Conduct.

In its long history, Sony has always strived to do business in a fair, honest and ethical way.

We are proud to be members of a company with a reputation for high ethical standards.

Our Code of Conduct gives us the tools to conduct our business activities on a principled path.

We should always stay true to our Code. In order for Sony to retain the trust of our stakeholders,
we need to impart our culture of ethics to the next generation.

Sony’s reputation is based upon the actions of each and every one of us, at all levels, and in all locations.

Together, we can make Sony more influential and create an extraordinary future for all.





SONY GROUP CODE OF CONDUCT

1. Core Principles
2. Fair Labor and Employment Practices
3. Responsibility for Products and Services
4. Protection of Intellectual Assets
5. Fair Business Practices
6. Responsible Business Conduct
7. Ethical Personal Conduct
8. Responsibility of Every One of Us





This Code sets forth the basic standards of ethical and responsible business conduct that must be followed by all directors, officers and employees of Sony ("Sony Personnel" or "we") in our daily work at Sony. These standards are based on Sony's ethical values of Fairness, Honesty, Integrity, Respect and Responsibility that are critical to Sony's success.

All Sony Personnel must act in accordance with this Code.

"Sony Group" or "Sony" means (i) Sony Corporation,
(ii) any company where more than 50% of voting rights is owned by Sony Corporation, and
(iii) such other companies as jointly determined by the CEO and Corporate Executive Officer in charge of Compliance of Sony Corporation to be included.

Violations of this Code may result in disciplinary action up to and including discharge.





Think Globally

As a player on the global stage, Sony respects human rights and appreciates diversity.
We create excitement that transcends region and culture.

1. Core Principles

1.1 Honest and Ethical Business Conduct

Our reputation as an ethical company is one of our most valuable assets and crucial to our continued success. Sony's policy is to comply with all applicable laws and regulations of the countries and regions in which we operate and to conduct our business activities in an honest, ethical and responsible manner. We value fairness and integrity and respect each other. We have a responsibility to understand and follow legal and internal policy requirements that apply to our jobs.

1.2 Relationship with Stakeholders

It is the core corporate responsibility of Sony to society to pursue its corporate value enhancement through innovation and sound business practices and contribute to developing a sustainable society. We will all give due consideration to the impact of our business activities on the interests of our stakeholders including shareholders, customers, employees, suppliers, business partners, local communities and other organizations.

1.3 Respect for Human Rights

Sony believes that all human beings should be treated with dignity and respect. Sony is committed to uphold internationally recognized human rights of all people. We will all use reasonable efforts to avoid causing or contributing to adverse human rights impacts that may arise from our operations, products, services and/or business relationships and will act diligently to help remediate any impacts that may occur.

1.4 Appreciating Diversity

Diversity is in Sony's DNA and the diversity of our businesses, Sony Personnel, business partners and other stakeholders serves as the foundation of our competitive advantage. As members of a company that conducts business in a number of regions and countries, we recognize that conduct that is socially and professionally acceptable in one culture or region may be viewed differently in another. We will give careful consideration to such differences when performing our duties.



Maintain a Workplace that supports a Spirit of Freedom and Open-mindedness

We strive to maintain a workplace where everyone can work together utilizing our unique talents and skills without fear of discrimination.

A good working environment fosters our creativity and innovation.

2. Fair Labor and Employment Practices

2.1 Equal Employment Opportunity / Non-Discrimination

Sony strives to promote diversity. We seek to create a culture that allows all Sony Personnel to contribute their unique talents and skills so as to provide the best products and services to our customers. Sony is committed to recruiting, hiring, training, promoting and otherwise treating applicants and employees without discrimination based on factors that are unrelated to Sony's legitimate business interests.

2.2 No Forced Labor / Child Labor

Sony will not use any form of forced or involuntary labor where people are forced to work against their will, including forced labor to work off a debt, prison labor and human trafficking.

In addition, Sony will not use child labor. "Child" means a person younger than 15 years old (or younger than 14 years old where a local law provides for a lower age) or the local legal minimum age for labor, if it is higher. This does not apply to work or service of performers or recording artists or that otherwise by its nature is reasonably necessary to be procured from a child, to the extent permitted by local law (for example, a child actor/actress).

2.3 Sound Labor and Employment Practices

Sony has adopted sound labor and employment practices and endeavors to ensure Sony Personnel are treated in accordance with the applicable laws and regulations of the countries and regions in which it operates.

In conformance with applicable local laws and regulations, Sony respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, and respects the right of workers to refrain from any such activities.

2.4 Work Environment - Anti-Harassment / Anti-Discrimination / Health & Safety

Sony is committed to maintaining a healthy, safe and productive work environment that is free from discrimination or harassment, in which all individuals are treated with respect and dignity. Sony complies with all applicable local laws that prohibit discrimination and harassment. Sony will not tolerate any form of discrimination, or harassment of any kind, including sexual harassment, bullying or other behaviors that create a hostile work environment. We will also adhere to all applicable health and safety laws and regulations as well as internal rules and policies to help ensure workplace safety.



The Responsibility behind KANDO

Our goal is to deliver excitement and entertainment through our products and services, while contributing to building a more sustainable society with our ideas and technologies. We can achieve this goal only if our products and services are safe, accessible and environmentally friendly.

*KANDO translates to "move people emotionally."

3. Responsibility for Products and Services

3.1 Product and Service Safety and Accessibility

At Sony, we strive to continually develop and implement programs in all phases of our operations that meet or exceed legal requirements to help ensure the safety of our products and services. Sony is committed to giving safety instruction and information to customers that is accurate, understandable and prominently displayed. Sony also will give careful attention when designing and planning our products and services to help ensure accessibility.

When we become aware of any incidents or safety problems in connection with our products or services, we will report them in accordance with Sony's internal rules. Should an incident or safety problem be reported, we will promptly investigate the matter and take appropriate action.

3.2 Advertising and Marketing

Sony sells products and services based on their merits. Sony does not engage in false or misleading advertising or advertising that slanders others. Certain countries prohibit comparative advertising. Whenever referencing a competitor or its products or services in a country where this practice is permitted, we will ensure that the comparison can be substantiated and that the statement is complete, accurate and not misleading.

3.3 Environmental Conservation

Sony recognizes the importance of preserving the environment and creating a quality of life for all humanity and for future generations to come. Sony is committed to the creation of a more sustainable society by achieving a zero environmental footprint throughout the lifecycle of our products and business activities. We will endeavor to evaluate and implement programs that meet or exceed legal requirements, and consider environmental impact as a fundamental criterion when evaluating projects or operations.



Protect the Seeds of the Future

Ideas, technology and information are vital assets for nurturing our future.
We protect our own assets and respect those of others.

4. Protection of Intellectual Assets

4.1 Intellectual Property

Sony's intellectual property is one of Sony's most valuable assets and it differentiates us from our competitors. We will all work together to protect Sony's intellectual property such as our patents, designs, trademarks, trade secrets, and copyrights including compositions, sound recordings, visual works and computer programs. We will vigorously defend Sony's rights and also respect the rights of others. We will not knowingly misuse the intellectual property of others or violate their intellectual property rights.

To the extent permitted by and subject to applicable laws and regulations, all inventions and creations generated by Sony Personnel belong to Sony. We will secure Sony's rights to such inventions and creations in accordance with company instructions.

4.2 Confidential or Proprietary Information

Information is a valuable corporate asset. We will safeguard Sony's confidential or proprietary information as well as information that our suppliers, business partners or customers entrust to Sony. "Confidential or proprietary information" is any important or valuable information that has not been disclosed to the general public. It includes inventions, creations, know-how and trade secrets as well as financial information, corporate strategy, marketing programs, and information about relationships with customers, suppliers and business partners. We may not disclose or distribute any confidential or proprietary information except as authorized by the company. We will use such information only for the purpose permitted by the company in connection with our duties at Sony.

4.3 Personal Information

Sony respects the privacy of individuals, such as customers, employees of suppliers and business partners and Sony Personnel, and has developed and implemented policies and internal rules regarding personal information. We will observe and comply with all applicable laws and regulations as well as applicable internal rules and policies whenever collecting, maintaining, using, disclosing or disposing of personal information.

4.4 Information Security

Sony recognizes the importance of information security both in achieving financial success and maintaining the trust of our stakeholders, and has established policies and procedures to help protect our information resources and information systems from unauthorized access or leakage, falsification, loss, destruction or other security risks. Effective security is a team effort requiring the participation and support of every employee and affiliate who uses our information resources and/or systems. We must all help keep our information resources and information systems safe by following our information security policies and procedures.



Maintaining Stakeholder Trust Lets Us Take on New Challenges

Acting fairly with the highest ethical standards and not just in compliance with the law is absolutely essential to our advancement on the global stage.

Stakeholder trust is crucial to our success.

5. Fair Business Practices

5.1 Fair Competition

Sony's policy is to comply with all applicable antitrust, competition and fair trade laws and regulations of each country and region where Sony conducts business. These laws and regulations are designed to prohibit agreements or practices that fix prices, divide markets, limit production or otherwise impede or destroy fair competition in markets. Some countries or regions enforce their antitrust or competition laws against activities taking place outside their countries or regions if the activities affect their markets. We must know and comply with those laws and regulations applicable to our jobs. When any doubt exists as to the legality of any proposed action or agreement, we must promptly discuss the matter with our legal department.

5.2 Trade Controls

Sony complies with applicable trade control laws and regulations. These laws and regulations prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals or entities to secure international peace and security. We must know and comply with those laws and regulations as well as relevant internal rules and policies applicable to our jobs at Sony.

5.3 Fair Procurement

Sony selects its suppliers and contractors on the basis of competitive price, quality, delivery and other objective standards.

Sony expects its suppliers and contractors to adhere to Sony's ethical values and comply with applicable Sony policies concerning compliance with laws, respect for human rights, fair labor and employment practices, environmental conservation and the safety of products and services.

5.4 Anti-Corruption

Sony prohibits corrupt practices in any form, including bribery, kickbacks, and other unlawful payments, in both the public (government) and the private (commercial) sectors. Sony Personnel may not make any payment or provide any gifts, entertainment or other business amenity to individuals employed by current or prospective Sony customers, suppliers or other business partners for improperly influencing them to obtain or retain business, or to secure any improper business advantage. In addition, Sony Personnel may not accept any payment or any gifts, entertainment or any other business amenity that appears to influence their business decisions.

Great care must be taken in dealing with government officials. Sony has established internal policies and rules that prohibit gifts and payment of anything of value to government officials, directly or indirectly, for the purpose of, or that appears to be for the purpose of, seeking favorable arrangements or actions by such officials.

We will observe applicable laws and regulations, as well as our internal rules and policies with respect to giving and receiving gifts, entertainment and other benefits.



Hold Yourself Accountable

Each of us must do our part to maintain our reputation as a trusted and ethical company. We take pride in always being true to our values of honesty and accuracy.

6. Responsible Business Conduct

6.1 Sound Decision Making

Business decisions must be made on an informed basis, in good faith, and in the honest belief that the action taken is in the best interest of Sony. We will check and ensure that the decision to be made will satisfy at least the following preconditions:

- (i) It will not violate any applicable law, regulation or internal rule or policy;
- (ii) No personal interest or self-dealing is involved;
- (iii) It is made within individual authority levels given by the corporation;
- (iv) It is made with due care following a reasonable effort to become familiar with the relevant and available facts; and
- (v) It is made in good faith based upon a reasonable belief that the best interests of Sony are served by the decision.

The design of the organizational structure and personnel assignments are important factors that help ensure sound decision making. When structuring an organization or making personnel assignments, managers at Sony will pay reasonable attention to introducing appropriate measures such as segregation of duties and checks and balances, depending upon the nature and size of its operations, to help ensure sound business decisions.

6.2 Public Disclosure

The shares of Sony Corporation, the ultimate parent of all Sony Group companies, are listed for trading on exchanges in Japan and the United States. Accordingly, Sony will ensure that our public disclosures are in full compliance with all applicable requirements in both countries and are fair, timely, accurate and understandable. Also, Sony will endeavor to promote constructive dialogue with shareholders and investors, so as to maintain a relationship of trust with them. To achieve these objectives, Sony has established disclosure controls and procedures and all Sony Personnel involved in preparing our public disclosures will ensure that our disclosures are made in accordance with those controls and procedures.

6.3 Recording and Reporting of Information

We must ensure that all records and reporting of information, including but not limited to books and other financial records, will be accurate, complete, honest and timely and will be a fair representation of facts. We should never cause records to be inaccurate or create records that are misleading or artificial.

6.4 Tax Compliance

It is Sony's policy to comply with all applicable tax laws and regulations of each country and region where Sony conducts business as well as the common rules and guidance regarding international taxation. We must know and comply with those laws and regulations applicable to our job.



Act with Integrity

Fairness and Honesty, both inside the Company and in our dealings with the public, are values that are vital to Sony, its heritage and its future.

7. Ethical Personal Conduct

7.1 Insider Trading

It is illegal and subject to civil and criminal sanctions in many countries to trade stocks or other securities of a corporation while possessing "material non-public information" about such corporation. "Material non-public information" is any non-public information that a reasonable investor would consider important in deciding whether to trade stocks or securities. Some examples of such information include: financial performance including earnings, dividend plans, alliances with other companies, divestitures, acquisitions, new products, advances in research and development and any other significant activities. Sony has established internal policies and rules related to trading by Sony Personnel of stocks and securities of listed companies. We must be familiar with, and comply with, such internal policies and rules. We must not trade in stocks or other securities if we have material non-public information about Sony or its business partners. We also must not induce such trading by others (such as family, friends, customers and other Sony Personnel) by disclosing material non-public information.

7.2 Personal Conflicts of Interest

We must always act in Sony's best interests and avoid any situation where our loyalties may be divided between Sony's interests and our own interests – such as a financial or other business relationships with a supplier, customer or competitor – that would impair our independent judgment. Even if nothing wrong is intended, the appearance of a conflict can cause others to doubt our fairness and have a negative effect on Sony's business.

Each of us should refer to applicable conflict of interest policies for guidance in the event of any situation that might be or might appear to be, a conflict with Sony's interest. Prompt and full disclosure is the key requirement should any such situation arise. We must faithfully notify a manager/supervisor, the human resource department and/or the legal department so that the situation can be reviewed and approved, if appropriate.

7.3 Corporate Assets

Sony's assets are to be used only for legitimate business purposes and only by authorized Sony Personnel or their designees. We have a duty to protect Sony's assets from loss, damage, misuse, theft or sabotage. "Sony's assets" cover both tangible and intangible assets, including brand, trademark, know-how, confidential or proprietary information and information systems. We must not pursue personal benefits using Sony's assets. To the extent permitted under applicable laws, Sony reserves the right to monitor and inspect how its assets are used by Sony Personnel, including inspection of all e-mail, data and files kept on personal computers or other devices.

7.4 Media Relations and Public Statements

Sony's business activities are monitored closely by the media, such as newspapers, magazines, radio, television, internet media and security analysts. In order to provide clear and accurate information to the public, it is vital that comments to the press or reporters be made only by designated spokespeople for the company. We must not initiate contact with the media or respond to their inquiries for or on behalf of Sony without first obtaining the authorization of the corporate communications, investor relations, or other departments given the authority to deal with those inquiries.

Online, our personal and business personas are likely to overlap. When using social media (including personal social media accounts), we must adhere to Sony's internal policies and rules so that we will not give the appearance that we are speaking on behalf of Sony. When we come across posts that are negative to Sony or require a reply, we will not directly respond ourselves, but will contact the official communication teams within Sony to handle the situation.



Share Your Concerns

When you raise your questions and concerns, it enables Sony to respond quickly to any potential problems. Finding and resolving potential problems helps to retain trust and protect Sony's future.

8. Responsibility of Every One of Us

8.1 Reporting Concerns and Hotline

Speaking up is not always easy, but when we raise concerns, we protect Sony and our colleagues from harm. If we think that any Sony Personnel may have engaged in unethical or illegal conduct, we have a duty to our colleagues and to Sony to promptly report our concerns. We are all expected to participate, when asked, in an investigation.

Sony has many resources available to Sony Personnel to raise questions or concerns about any possible violations of the law or Sony policy, including the Sony Ethics & Compliance Hotline. Reports to the Hotline may be made by name or anonymously. All information provided to the Hotline is handled confidentially to the extent allowed by local law.

8.2 No-Retaliation

Sony does not allow any form of retaliation against anyone for making a good faith report or for participating in an investigation of a report. Anyone who makes a good faith report will be treated fairly and respectfully.

Sony Ethics & Compliance Hotline

The Sony Ethics & Compliance Hotline is available to all Sony Group employees as a resource to report concerns or seek guidance about possible violations of the law or Sony policies. The Hotline is maintained by an independent third party with specially trained operators and broad language capability and is accessible at all times, day or night, via telephone or internet.

The information you provide to the Hotline will be sent to the Regional Compliance Office. They will review the report and take actions as appropriate in close cooperation with legal and/or other subject matter experts. The status of each Hotline call is reported to the Sony Corporation Audit Committee.

While Sony encourages you to provide your name so that it can be sure to get all the information necessary for an investigation, you may remain anonymous, to the extent permitted under local law. If you choose to remain anonymous, the third party will not reveal any information about your identity to Sony – not even if you are female or a male.

Additional information about the Hotline can be found both on the Sony Corporation intranet website and on your company's intranet website.

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Standard SONY Logotype

Our Founders created the name “SONY”, crossing the Latin word “sonus” meaning “sound” with the English diminutive “sonny” meaning a bright, young boy. It is easy to pronounce and read in any language and has a short lively ring, which matched the spirit of freedom and open-mindedness which Founder Masaru Ibuka emphasized in the company's Founding Prospectus.

This photo shows the standard SONY logotype bestowed upon Norio Ohga, former Chairman of Sony Corporation, who strongly believed that the four characters in “S O N Y” are our most important asset. We chose this image to introduce our Code because it symbolizes how much we value Sony’s brand image and the importance of preserving Sony’s reputation and brand by following the principles of our Code.

SONY GROUP CODE OF CONDUCT

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Publisher: Legal & Compliance Department, Sony Corporation

SONY