



SONY GROUP CODE OF CONDUCT

Sony's Purpose & Values

Purpose

Fill the world with emotion,
through the power of creativity and technology.

Values

Dreams & Curiosity

Pioneer the future with dreams and curiosity.

Diversity

Pursue the creation of the very best by harnessing diversity and varying viewpoints.

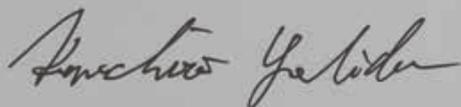
Integrity & Sincerity

Earn the trust for the Sony brand through ethical and responsible conduct.

Sustainability

Fulfill our stakeholder responsibilities through disciplined business practices.

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 embracing Sony's Purpose and Values.

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

Natsuko Takei



“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

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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.

You are responsible for understanding and following this Code and all policies and procedures that are relevant to your job responsibilities. All relevant policies can be found on the Sony DADC Intranet.

Violations of this Code and/or applicable Sony policies may result in disciplinary action up to and including discharge.

"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.





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 or 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 Inter Sony Global, Sony Corporation's intranet site, and on the Sony DADC Intranet.

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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.

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Publisher: Legal & Compliance Department, Sony Corporation

SONY