

SIE Email, Internet & Electronic Content Acceptable Use Policy

Purpose

The purpose of the below guidelines is to establish a consistent policy with regard to acceptable use of electronic communication (e.g., electronic mail, instant messaging), internet, internal networks, and electronic content that is created, sent, received or downloaded by SIE employees, contractors, consultants, temporary employees and other individuals expressly authorized by SIE to use and have access to SIE's electronic mail system or Internet/Intranet connectivity via SIE resources ("Users"). Every SIE employee is charged with the responsibility for complying with these guidelines. Users who violate this policy will be subject to disciplinary action, up to and including termination of employment. Users who are contractors, consultants or other individuals contracting with SIE may have their contract(s) terminated by SIE.

I. Electronic Mail

Electronic mail (Email) is similar to writing on SIE stationery. All electronic communication should therefore reflect the tone and quality of SIE's business correspondence. Electronic communications must not violate the Sony Group Code of Conduct, SIE policies, SIE guidelines, or local, state or federal laws. Obscene, threatening, inflammatory, discriminatory or controversial content sent via electronic communication is prohibited.

SIE's No Harassment Policy strives to maintain a workplace free of harassment and sensitive to workplace diversity. The use of computer or email systems in ways that violate SIE's No Harassment Policy is prohibited. Users may not use electronic communications in any way that is offensive or harmful to others, obscene, threatening, harassing, or unlawfully discriminatory. The display or transmission of images, messages or communications containing ethnic, racial, gender-based, or religious slurs, pornography or anything else that may violate the Harassment Policy is prohibited.

Email should primarily be used for business purposes. Any personal use of the computer or email systems that interferes with SIE business, User's work, or the systems themselves is prohibited. Non-business-related SIE-wide emails should be kept to a minimum, and all email, whether business-related or not, should be addressed to a particular audience.

Managers are responsible for ensuring appropriate use of electronic communications within their departments. Users should notify their immediate supervisor, the Human Resources Department, Compliance or any member of management upon learning of violations of this policy. If the violation involves the Sony Code of Conduct, Users may also report issues via the Sony Ethics & Compliance Hotline.

II. Electronic Security and Company Access

Users should not maintain any expectation of privacy in written, verbal or electronic communications sent from or received at SIE. The Company access procedures set forth below also apply to Internet use.

All computers, the data stored on them, and email accounts are, and remain at all times, the property of SIE. As such, all messages created, sent or retrieved over the Internet or SIE's email services are subject to SIE's policies. SIE reserves the right to retrieve and read any message composed, sent or received on SIE's computer equipment and/or email service. SIE may at any time, without prior notice, inspect and search any and all SIE property, computer, or computer file for the purpose of promoting safety in the workplace, complying with laws and regulations, and achieving the objectives of this and other SIE policies. Such inspections may occur at any time, in the presence or absence of the employee, and with or without notice or the employee's consent. When appropriate, items found or information retrieved during such inspections, including text and images, may be turned over to law enforcement or other third parties without prior consent of the User.

Users may access only the files or programs, whether computerized or not, that they have permission to enter. Unauthorized review, duplication, dissemination, removal, damage or alteration of files, computer systems or programs, or other property of SIE, or improper use of information obtained by unauthorized means, may be grounds for disciplinary action, up to and including immediate termination of employment or services from SIE. SIE reserves the right, without notice, to terminate any services or computing resources it owns and operates.

III. Internet Use

Internet connections provided by SIE are intended primarily for business-related purposes. Use of the Internet for personal use should be kept to a reasonable minimum. Users are expected to use these tools appropriately in conducting SIE's business activities.

Each employee is responsible for ensuring that he or she uses this Internet access privilege in an effective, ethical and lawful manner. Users shall not use the Internet in any way that is disruptive, offensive to others, harmful to person or morale, obscene, threatening, harassing, inflammatory or discriminatory. The display or transmission of images, messages or communications containing ethnic, racial or religious slurs, pornography or anything that may be construed as harassment or disparagement of others is prohibited. All communication sent via the Internet must have the User's name attached. No message is to be transmitted under an assumed name. Users may not attempt to obscure the origin of any message.

SIE's Intranet should not be used for personal gain or advancement of individual views. Solicitation of non-SIE business, or any use of the Internet for personal gain through SIE's network or other electronic communication tools is prohibited.

IV. SIE Software and Electronic Content

Respect for the intellectual work and property of others is vital to the SIE mission as a producer of video game intellectual content. This principle applies to works of all authors and publishers in all the media, including the labor and creativity resulting in computer software, electronic content, and Internet downloadable content. Unless software has been placed in the public domain, the owner of a copyright holds exclusive right to the reproduction and distribution of their product. Unauthorized copying of copyrighted works including, but not limited to, software, computer programming source code, configuration files, executable modules, databases, documentation, electronic content, audio, video, and graphic images is illegal. Users shall not engage in any such copying or improper use (e.g., use of software inconsistent with its applicable license agreement, and use of personal or other non-licensed software on SIE Property). Unauthorized duplication or use of copyrighted content may subject Users and/or SIE to both civil and criminal penalties under the U.S. Copyright Act.

It is the policy of SIE to respect all software copyrights and to adhere to the terms of all licenses to which SIE is a party. Users shall not use software in any manner inconsistent with the applicable license agreement, including giving or receiving software from clients, contractors, customers and others. SIE will take all steps necessary to prohibit Users from illegally duplicating any licensed software for use either on SIE premises or elsewhere unless SIE is expressly authorized to do so by agreement with the licensor.

All software acquired for or on licensed on behalf of SIE or developed by SIE employees or contract personnel on behalf of SIE is and shall be deemed the property of SIE. All such software must be used in compliance with applicable licenses, notices, contracts, and agreements.

All licensing and/or purchasing of systems and operating software shall be centralized with the appropriate Information Technology department to ensure that all applications conform to software standards, are purchased at the best possible price, and comply with all applicable licenses. Only software licensed or purchased through the procedures outlined above may be used on SIE property.

Users are not permitted to bring software from outside SIE and load it onto SIE computers without the appropriate approval or license. SIE software (including licensed software) cannot be taken outside SIE or loaded on another computer if it also resides on SIE computer unless the software license permits such use.

V. Sony IT Platform Monitoring

Subject to applicable law, SIE and its parent company, Sony Corporation America (collectively “Sony”) reserve the right without notice, to monitor and audit (a) the Sony IT platform, and (b) use of the Sony IT platform, including access to and use of the Internet and websites accessed or attempted to be accessed; and to search for or find, access, download, save, transfer, read, copy, print and examine any data created, sent, stored, or received over, on or through Sony’s online connections or the Sony IT platform, including e-mails, attachments to emails, emails that remain on company computers in temporary Internet folders, and/or other messages.

These rights apply to all applications and electronic communications and files, regardless of whether a third-party service provider is used to access, create or convey the data. This includes, for example, any e-mails sent through personal, password-protected Web-based e-mail accounts via the Sony IT platform.

These rights may be exercised at any time during active use of the Sony IT platform, between uses, and after an employee’s access is terminated. Even information that has been encrypted or deleted may be unencrypted, retrieved, recreated and reviewed.

Although access to some parts of the Sony IT platform requires authentication (e.g., a password), that does not mean that communications (including personal communications) sent over or through the Sony IT platform are private. In fact, they are not private – communications; online activity; file creation, access, transfer and saving; and all other uses of the Sony IT platform are subject to routine real-time and/or delayed monitoring, recording, search and other actions as set forth above.

Communications and other activities and use of the Sony IT platform may be used by Sony or disclosed by Sony to third parties for any legitimate business purpose, including, but not limited to:

- Investigating possible violations of any laws or company policy and enforcing Sony policies
- Protecting Sony’s IT platform, intellectual property, or confidential information, employee and customer privacy, other rights and property
- Responding to government and third party inquiries
- Investigating, pursuing, or defending any potential legal claim or potential civil or criminal offence
- Pursuing disciplinary actions up to and including termination of employment and legal remedies

All of the above conditions apply regardless of whether your access or use of the Sony IT platform includes the display of a Notice and Consent Banner ("banner"). When a banner is used, the banner functions as an additional consent and to remind the user of the conditions that are set forth in this Policy, regardless of whether the banner describes these conditions in full detail or provides a summary of such conditions, and regardless of

whether the banner expressly references the SIE Email, Internet & Electronic Content Acceptable Use Policy.

Consequently, there is no expectation of privacy regarding communications or data transiting or stored on this information system including when engaging in any personal use or when accessing the Internet for personal use.