

# Sony Interactive Business Principles



# Introduction

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Sony Interactive Entertainment's reputation as an ethical organization is one of our most valuable assets and is crucial to our continued success. We are committed to complying with all applicable laws and regulations of the territories in which we operate and to conducting our business in an honest, ethical, and responsible manner. We expect our Business Partners to share our values and embrace this commitment.

To help ensure our commitment, Sony Interactive requires certain suppliers involved in manufacturing our hardware products, to adhere to the Sony Group Supply Chain Code ("Supply Chain Code").

These Sony Interactive Entertainment Business Principles apply to all Sony Interactive suppliers, agents, consultants, customers, business partners, service providers, contractors, subcontractors, and their affiliates who are not subject to the requirements of the Supply Chain Code (collectively "Business Partners"). These Business Principles set out Sony Interactive's expectations, standards and guidelines for doing business with Sony Interactive and on Sony Interactive's behalf by such Business Partners, and they highlight how we all benefit from a commitment to ethics and integrity.

Business Partners must adhere to Sony Interactive Business Principles while conducting business with or on behalf of Sony Interactive, and we strongly encourage them to promote the requirements of these within their affiliates and supply chains.





# Fair Business Practices



## ***Conflicts of Interests***

Business Partners must avoid potential conflicts of interest in their work with us. Business Partners shall promptly disclose: (i) any family or other close personal relationships with our employees who may have a non-business-driven influence on their engagement with us; and (ii) any business relationships they have with other Business Partners doing business on Sony Interactive's behalf.

## ***Bribery and Corruption***

Business Partners shall comply with applicable anti-corruption laws and regulations and must implement monitoring and enforcement procedures to ensure compliance. Business Partners shall not engage in any form of corruption, including bribery, kickbacks and other unlawful payments. We expect the highest standards of integrity and the utmost care in dealing with government officials in any transactions involving Sony Interactive.

## ***Gifts and Entertainment***

Business Partners shall use good judgement if offering gifts or entertainment ("Gifts") to Sony Interactive or Sony Interactive employees and shall not offer indecent, illegal, lavish or disproportionate Gifts that may lead to a potential conflict of interest, or the perception of a conflict of interest, improper advantage, or influence over business decisions. Exchanging monetary Gifts (e.g. cash, vouchers) is always prohibited, even where this is customary, and applicable laws regarding Gifts shall be followed when Business Partners are government officials.

## ***Trade Control***

Business Partners must comply with trade control laws and all applicable export, re-export and import laws and regulations (including, without limitation, sanctions and embargoes) that prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals or entities.

# Fair Business Practices

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## ***Anti-Money Laundering***

Business Partners must comply with all applicable anti-money laundering laws, and must not tolerate, facilitate or support any money laundering activities.

## ***Anti-Tax Evasion***

Business Partners must comply with all applicable tax laws and regulation, conducting business in a manner that prevents opportunities for tax evasion.

## ***Accurate Books and Records***

Business Partners are expected to keep accurate, complete and timely records at all times and to retain such records for the period required by applicable law. This includes properly recording all expenses, payments and invoices. Business Partners shall not inaccurately record information or create records that are misleading or fraudulent.

## ***Fair Competition***

Business Partners shall compete fairly and honestly and comply with all competition laws applicable to their activities. In particular, Business Partners shall not enter into any agreement that could improperly fix prices, divide the market, limit production or otherwise impede or destroy fair competition in the market, or engage in other practices not in compliance with applicable competition laws.





# Human Rights, Fair Labor Practices and Safety

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## ***Human Rights***

Business Partners shall uphold internationally recognized human rights and stand firmly against any form of modern slavery, including but not limited to, forced labor, child labor, human trafficking and slavery. Where required, we expect Business Partners to implement policies and procedures to ensure respect of all human rights in their business and supply chain.

## ***Fair Treatment, Non-Discrimination, Anti-Bullying and Anti-Harassment***

Business Partners shall strive to create a work environment in which all individuals are treated with equality, dignity and respect. Business Partners shall not recruit, promote or otherwise discriminate against any worker based on age, gender, ethnicity, religion, sexual orientation or any other status. Business Partners commits to a workplace free of harassment, bullying and retaliation and never tolerate any form of behavior that could create a hostile work environment.

## ***Healthy and Safe Work Environment***

Business Partners shall comply with all applicable health and safety laws to provide and maintain a safe work environment and maintain health and safety management systems that include procedures to address incidents and provide corrective actions.

## ***Provide Effective Grievance Procedures***

Business Partners shall provide workers with effective grievance procedures to raise concerns in the workplace and report any unlawful or unethical behavior without fear of reprisal or discrimination. These grievance procedures must strictly prohibit any form of retaliation against workers for raising workplace concerns.



# Protecting Information and Assets

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## ***Intellectual Property and Confidential Information***

Business Partners shall respect and protect the confidential information and intellectual property rights used in its business, including but not limited to, patents, designs, trademarks, trade secrets, copyrights and financial information. Business Partners shall use software, hardware and content only in accordance with their associated licenses or terms of use.

## ***Privacy***

We expect our Business Partners to protect the personal information of their employees, everyone they do business with and other stakeholders. Business Partners shall develop and implement policies and procedures regarding personal information and comply with all applicable laws and regulations whenever collecting, storing, using, sharing, disclosing, disposing of, or otherwise processing individuals' personal information.





# Environmental Protection

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Business Partners shall have programs and sustainability practices in place to comply with all applicable environmental laws. The impact on the environment, including the ways to avoid, minimise, reduce or offset this impact shall be a fundamental consideration when evaluating projects or operations.





# Raising Questions or Concerns and Reporting Potential Misconduct

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**Business Partners who believe that an employee of Sony Interactive, or anyone acting on behalf of Sony Interactive, has engaged in illegal or unethical conduct, should report the matter to Sony Interactive.**

We strongly encourage Business Partners who wish to raise a question, concern or report an incident of misconduct to contact:

- Sony Interactive's contract manager or primary contact
- The Sony Ethics & Compliance Hotline at this [Link](#)

A Business Partner's relationship with Sony Interactive will not be adversely affected by an honest report of potential misconduct.

