

# SONY GROUP CODE OF CONDUCT

Sony's Purpose, our social reason for being, is to "fill the world with emotion, through the power of creativity and technology." Our Values, namely, Dreams & Curiosity, Diversity, Integrity & Sincerity, and Sustainability, serve as a foundation to be cherished by our colleagues.

The Sony Group Code of Conduct provides a set of principles to guide us, as we engage in our day-to-day roles to pursue our Purpose, in alignment with our Values.

By following our Code and acting responsibly, we can establish trust with a wide range of stakeholders. This will also allow us to maintain trust in the Sony brand that we have earned since its founding and carry it into the future. I would like each of you to think how you should act, using our Code as your guide.

Let's build on that trust as we continue to contribute to our society with our creativity and technology, and work together to "fill the world with emotion."

President and CEO  
Representative Corporate Executive Officer  
Sony Group Corporation

Hiroki Totoki





“Would this conduct contribute to a better future for Sony, and a better future for our society and our planet earth?” This is the question the Sony Group Code of Conduct tries to answer.

Our Code helps us conduct our business fairly, keeping the above question in mind. By following the Code in our day-to-day work, we can nurture trust from our customers, our business partners, our investors, our fellow colleagues, and other multiple stakeholders surrounding us. Trust in Sony empowers us on our journey forward, and such trust contributes to Sony’s sustainable growth.

The Code explains what we should do to gain trust from our stakeholders. Our Code booklet also includes additional resources for you. Please read them whenever you have a chance and utilize them in your day-to-day activities. Your leaders and dedicated departments are always available to provide support.

Together, let’s make our Code a living, breathing standard for our daily behavior.

Senior Vice President  
in charge of Legal, Compliance, and Privacy  
Sony Group Corporation

**Kaori Takezawa**

# Our History of Ethical Culture

## ~In our Founder's Words~

Following the acquisitions of CBS Records and Columbia Pictures, Sony has come to be regarded as the leading Japanese company and the most advanced high-tech company. The increased attention to us means we could be publicly criticized anytime. I think we at Sony should be aware of this attention, and think again whether our activities, including advertising, promotion, publicity, products, and services, need to change or not.

It is through continuous effort and dedication over the past 40 years that our company Sony has become trusted around the world. Please think about that again. Our business should be something that contributes to our company's legacy. From every product we create, to how we sell that product, and provide after sales support – we cannot build trust among the diverse people of the world without paying careful attention to every one of our actions. We have strived to achieve that goal and that has been our company's way. As a result, today, trust for Sony exists worldwide, and we have gained many Sony fans. A good reputation is not easily achieved but can be quickly damaged. Just as each person has their own character and virtues, I want our company to continue to be loved, and respected, by people everywhere.

Excerpt from an article on Akio Morita's presentation at an internal global annual meeting with business heads / "Times" in-house magazine (July 10, 1990)





# 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

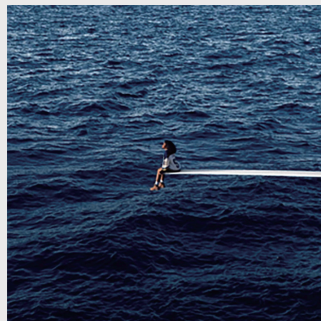
Pursue the creation of the very best by harnessing diversity and varying viewpoints.

### Integrity & Sincerity

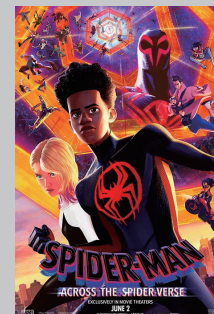
Earn the trust for the Sony brand through ethical and responsible conduct.

### Sustainability

Fulfill our stakeholder responsibilities through disciplined business practices.



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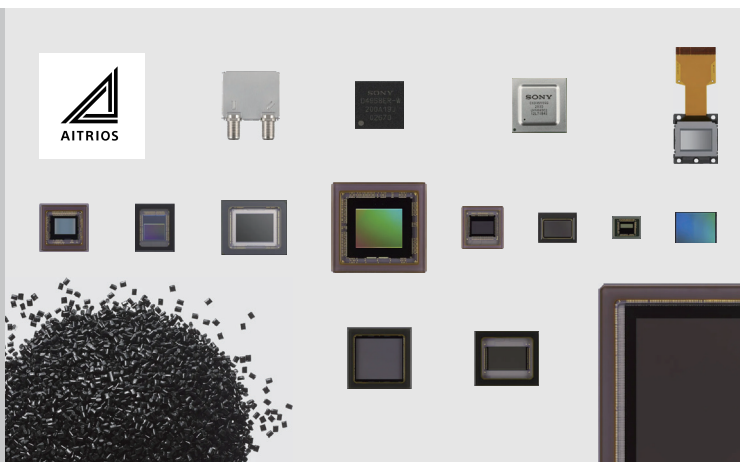
Spider-Man: Across the Spider-Verse now available on Disc and Digital.  
©2024 Sony Pictures Entertainment. All Rights Reserved. MARVEL and all related character names: © & ™ 2024 MARVEL.



Gran Turismo: Based on a True Story now available on Disc and Digital.  
©2024 Sony Pictures Entertainment. All Rights Reserved.

In this Code, “Sony” or “Sony Group” means:

- (i) Sony Group Corporation;
- (ii) any company more than 50% of whose outstanding stocks or interests with voting rights is owned directly or indirectly by Sony Group Corporation; and/or
- (iii) any company as will from time to time be jointly determined by the CEO and Senior Executive Vice President in charge of Compliance of Sony Group Corporation to be included.



## Table of Contents

<b>1</b>	<b>Earn Trust</b>	<b>08</b>	<b>4</b>	<b>Strive to Create and Deliver Kando</b>	<b>21</b>	<b>7</b>	<b>Safeguard Sony's Integrity</b>	<b>31</b>
<b>1-1</b>	Earn Trust for the Sony Brand	09	<b>4-1</b>	Be Diverse and Competitive	22	<b>7-1</b>	No Corruption	32
<b>1-2</b>	Make Sound Business Decisions	11	<b>4-2</b>	Deliver Kando Experiences	23	<b>7-2</b>	Avoid Conflicts of Interest	33
<b>1-3</b>	Speak Up	12	<b>4-3</b>	Market Honestly	24	<b>7-3</b>	Protect Sony's Assets	33
<b>2</b>	<b>Contribute to the World</b>	<b>14</b>	<b>4-4</b>	Compete Fairly	24	<b>7-4</b>	Keep Accurate Records and Reports	34
<b>2-1</b>	Contribute to a Sustainable Society	15	<b>5</b>	<b>Collaborate Responsibly</b>	<b>25</b>	<b>7-5</b>	Make Appropriate Public Disclosures	35
<b>2-2</b>	Live with Planet Earth	16	<b>5-1</b>	Collaborate with Business Partners	26	<b>7-6</b>	No Insider Trading	35
<b>3</b>	<b>Empower and Respect People</b>	<b>17</b>	<b>5-2</b>	Source Responsibly	26	<b>7-7</b>	Follow Trade Control Laws	36
<b>3-1</b>	Respect Human Rights	18	<b>6</b>	<b>Embrace Creativity and Technology</b>	<b>27</b>	<b>7-8</b>	Follow Tax Laws	36
<b>3-2</b>	Embrace Diversity of People and Foster Respect	19	<b>6-1</b>	Use Technology Responsibly	28	<b>7-9</b>	Communicate Responsibly	37
<b>3-3</b>	Engage in Sound Labor and Employment Practices	20	<b>6-2</b>	Create and Protect Intellectual Property	29			
<b>3-4</b>	Maintain a Healthy and Safe Work Environment	20	<b>6-3</b>	Safeguard Confidential Information	29			
			<b>6-4</b>	Respect Privacy	30			
			<b>6-5</b>	Maintain Information Security	30			

# 1

## Earn Trust

<b>1-1</b>	Earn Trust for the Sony Brand	09
<b>1-2</b>	Make Sound Business Decisions	11
<b>1-3</b>	Speak Up	12

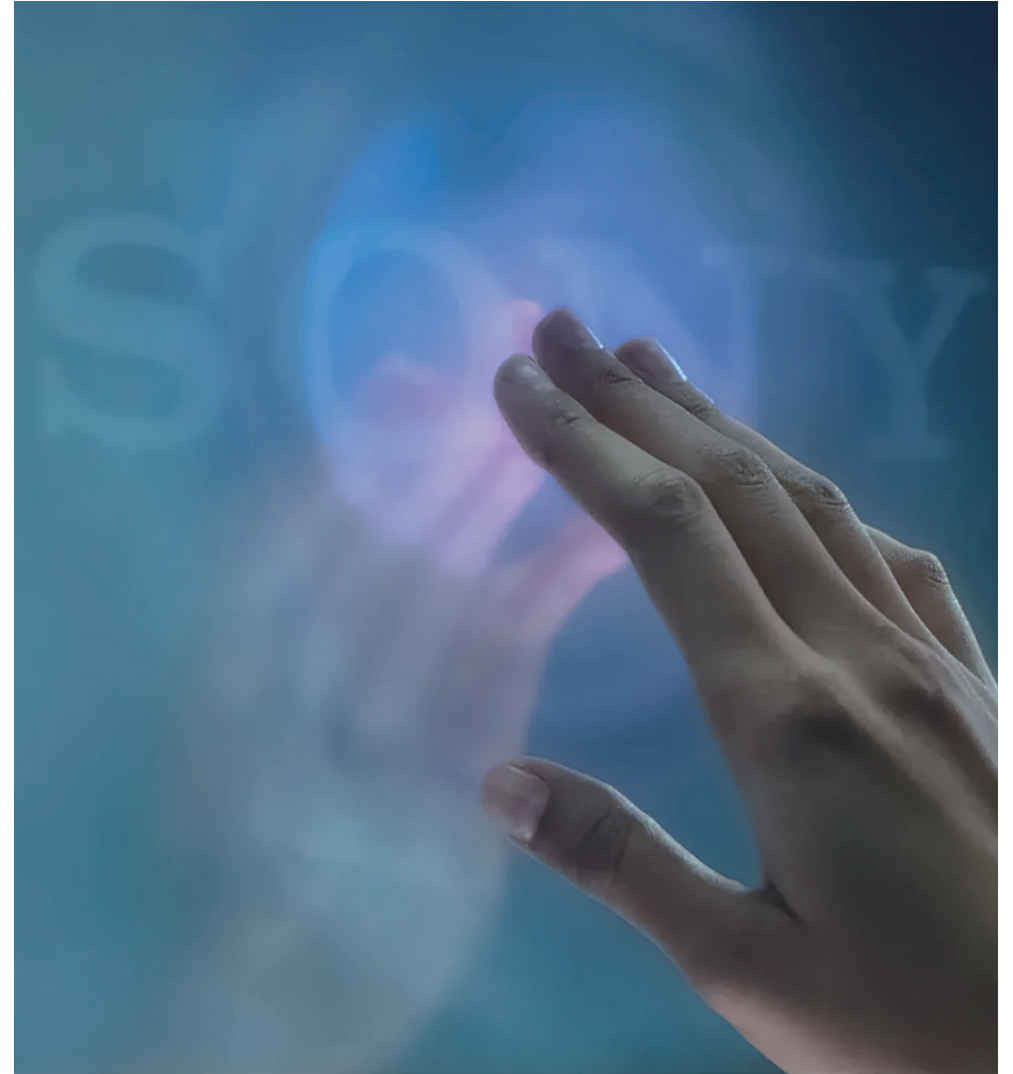


## 1-1

# Earn Trust for the Sony Brand

**We earn trust for the Sony brand through ethical and responsible conduct.**

The Sony brand is one of our most valuable assets. We protect our brand when we conduct business in an honest, ethical and responsible manner. Each of us must understand and follow the laws and policies that apply to our jobs.



The Motion Logo of the Sony logotype

## 1-1

### Our Responsibilities

As Sony directors, officers and employees (“Sony personnel”), we live our responsibilities under our Code when we:

- Know and follow our Code, policies and the laws that apply to our job, and contribute to the culture of ethics and compliance
- Ask questions when we are unsure of the right decisions or actions to take, and contact the relevant department and professionals within Sony for assistance
- Speak up when we observe or suspect misconduct

Sony managers have additional responsibilities to:

- Act as a role model and lead the culture of ethics and compliance within their teams
- Encourage employees to speak up without fear of retaliation
- Listen to employees, take their concerns seriously and appropriately handle any issues raised

All Sony personnel must comply with our Code. Violation of the Code may result in disciplinary action, up to and including dismissal.

In addition, we expect suppliers, contractors, business partners and other third parties to meet the same standards we expect of ourselves.

For more information, please see: | [➤ Supplemental material for managers \(Internal only\)](#)

1-2

# Make Sound Business Decisions

In our daily work, we make decisions that could impact our stakeholders and business. Each of us must make these decisions on an informed basis and in the best interest of Sony.

Before making business decisions, we make sure all the following criteria are met:



It will not violate any applicable law, this Code or any other policy.



We have the authority to make the decision.



It serves the best interests of Sony and does not involve personal interests or self-dealing.



We have made a good faith, reasonable effort to become familiar with the relevant and available facts.

Sony is committed to structuring our business organizations in a manner to ensure appropriate checks and balances to help ensure sound decision making.

For more information, please see: | [Delegation of Authority resources \(Internal only\)](#)

1-3

# Speak Up

Speaking up is important for us to build an ethical work environment. If we think that someone has engaged in misconduct, we have a duty to promptly report our concerns. We participate in an investigation when asked.

## How to Report Concerns

Sony has many ways for employees to raise questions or concerns about possible violations of Sony policies or the law. You can always report concerns to:

- Your manager
- Your human resources department
- Your legal or ethics and compliance department

If you are not comfortable using any of these resources, you may also contact the Sony Ethics & Compliance Hotline, which is operated by an independent third party. Reports to the Hotline may be anonymous and such anonymous reporter's identity will not be recorded or traced.

Whichever resource you choose, Sony treats all information you share confidentially. Sony only shares this information to the extent necessary to properly investigate, provide remediation, or as required by law.



### **Sony Ethics & Compliance Hotline:**

Sony Ethics & Compliance Hotline is available 24 hours a day, 365 days a year in multiple languages.

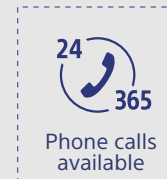
You can report anonymously or by name to the Hotline, but providing your contact information allows Sony to conduct a better investigation.

You can find how to raise a report by phone or through the website from the link below.

➤ [Sony Ethics & Compliance Hotline Website \(Internal only\)](#)

You can also find how Sony operates the Hotline / how Sony investigates reported matters from the below link.

➤ [Sustainability Report / Ethics and Compliance](#)







## 1-3

### No Retaliation

You will be treated fairly and respectfully if you make a report or participate in an investigation. Sony does not allow any form of retaliation against anyone for making a good faith report or for participating in an investigation. Proven retaliation is itself a violation of the Code. Those who engage in retaliation will be subject to disciplinary action, up to and including dismissal.

<div>!</div> <b>Examples of Retaliation</b>		
 <p>Abuse</p>	 <p>Refusal to promote</p>	 <p>Reassignment</p>
 <p>Exclusion</p>	 <p>Termination</p>	 <p>Bullying</p>
 <p>Demotion</p>	 <p>A pay cut</p>	 <p>A bad review</p>

# 2

## Contribute to the World

2-1 Contribute to a Sustainable Society ————— 15

2-2 Live with Planet Earth ————— 16

## 2-1

# Contribute to a Sustainable Society

**Through innovation and sound business practice, Sony endeavors to enhance its corporate value and contribute to the development of a sustainable society.**

In order to have people connected to each other through emotion, it is necessary to create a society in which everyone can live with peace of mind in a healthy global environment.

We act with due consideration of the impact of its business activities on stakeholders, including shareholders, customers, employees, suppliers, business partners, local communities and other organizations as well as the global environment, and focus on building trust with stakeholders through dialogue.



For more information, please see: [➤ Sony Group Portal | Vision of Founder and Basic Policy for Sustainability Initiatives](#)

[➤ Corporate Report](#)

[➤ Sustainability Report](#)

## 2-2

# Live with Planet Earth

**Sony recognizes the importance of preserving the natural environment and sustaining the earth for future generations.**

The world around us where all life exists inspires Sony to deliver Kando experiences. For humanity's healthy and enriched life, we strive to preserve and improve the natural environment through our technologies and businesses. We are committed to achieving a zero environmental footprint throughout the lifecycle of our products and business activities.

For more information, please see: | [▶ Sony Group Portal | Environment](#)

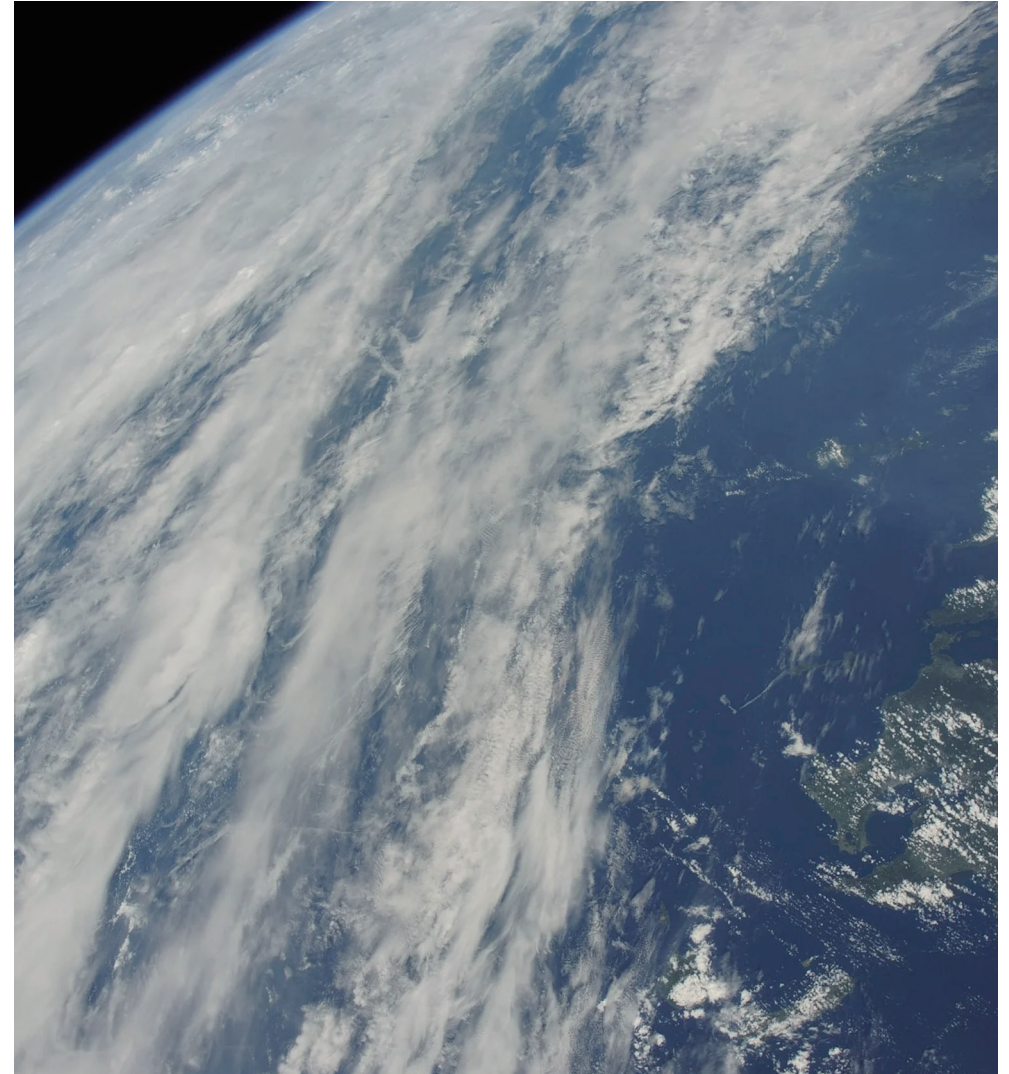


Photo taken by Sony nano satellite "EYE"



# 3

## Empower and Respect People

**3-1** Respect Human Rights ————— 18

**3-2** Embrace Diversity of People and Foster Respect — 19

**3-3** Engage in Sound Labor and Employment Practices — 20

**3-4** Maintain a Healthy and Safe Work Environment ——— 20

### 3-1

## Respect Human Rights

**Sony believes that all human beings should be treated with dignity and respect.**

Sony respects the internationally recognized human rights of all people throughout our value chain. We strive to avoid any adverse human rights impacts from our business operations, products, services and/or business relationships, and to act diligently to help remediate any impacts that may occur.

For more information, please see: | [▶ Sony Group Human Rights Policy](#)



## 3-2

# Embrace Diversity of People and Foster Respect

**Sony is committed to a workplace culture based on diversity, respect and equity.**

People are the driving force behind Sony's creativity and success. People thrive in an environment where they feel valued, respected and included. That is why Sony embraces diversity, equity and inclusion. We aim to create an environment free from harassment or discrimination of any kind. Sony's employment decisions are based on legitimate business reasons including performance and merit.

For more information, please see: | [▶ Sony Group Portal | Diversity, Equity & Inclusion](#)



### 3-3

## Engage in Sound Labor and Employment Practices

**Sony adopts sound labor and employment practices and ensures employees are treated in accordance with applicable laws and regulations.**

Sony respects workers' rights to form and join trade unions of their own choosing or refrain from any of these activities.

Sony will not use any form of involuntary labor where people are forced to work against their will. This includes forced labor to work off a debt, prison labor, or human trafficking. Sony will not use child labor. However, Sony will permit children to work, to the extent permitted by local law, for example as actors, recording artists or performers.



**"Child:"**

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.

### 3-4

## Maintain a Healthy and Safe Work Environment

**Sony maintains a healthy, safe, and productive work environment.**

Sony prioritizes the health, safety and well-being of our employees and business partners. That is why we adhere to applicable health and safety laws and policies.

For more information, please see: | [➤ Sustainability Report / Occupational Health & Safety](#)

# 4

## Strive to Create and Deliver Kando

**4-1** Be Diverse and Competitive ————— 22

**4-2** Deliver Kando Experiences ————— 23

**4-3** Market Honestly ————— 24

**4-4** Compete Fairly ————— 24



## 4-1

# Be Diverse and Competitive

## **Sony embraces diversity as the foundation of our competitive advantage.**

Diversity is in Sony's DNA. Our businesses, people, and stakeholders are diverse. This gives us strength and leads to our competitive advantage. Working in this diverse world, we are mindful that conduct considered socially and professionally acceptable in one culture or region may not be acceptable in another. We keep this in mind when performing our duties.

For more information, please see: | [▶ Sony Group Portal | Special You, Diverse Sony](#)



## 4-2

# Deliver Kando Experiences

### **Sony delivers life-enhancing products, services and entertainment.**

Sony believes quality, safety, security and accessibility of our products, services and entertainment are crucial to create, deliver, and share Kando. Therefore, Sony meets or exceeds legally mandated standards for quality, safety, security and accessibility. We are committed to provide information to our customers that is accurate, and easy to read and understand.

For more information, please see:

- [Sony Group Portal | Accessibility](#)
- [Sustainability Report / Quality and Customer Service](#)
- [Accessibility resources \(Internal only\)](#)
- [Quality Management resources \(Internal only\)](#)



#### **"Products, services and entertainment:"**

Everything Sony provides to customers, including software products, hardware products, services, and entertainment.

#### **"Accessibility:"**

The ability to use products, services and entertainment regardless of each individual's characteristics such as age and disability, capability or circumstances.

## 4-3

# Market Honestly

**Sony markets and advertises its products, services and entertainment honestly.**

Our customers rely on us to be honest when we communicate about our products, services and entertainment. This enables them to make informed decisions. We do not engage in false or misleading advertising and marketing.



If you have any concerns regarding advertising and marketing, please contact your legal department.

## 4-4

# Compete Fairly

**Sony competes vigorously, fairly, and complies with all applicable antitrust and competition laws.**

Antitrust and competition laws support market competition, which allows companies providing superior products, services and entertainment under better terms to be successful. Competition laws prohibit agreements or practices that impede or destroy fair competition. We must obtain advice from our legal department prior to exchanging information with competitors. We must know and comply with applicable competition laws wherever we do business.

For more information, please see: | [▶ Sony Group Global Policy on Antitrust/Competition Law Compliance \(Internal only\)](#)

# 5

## Collaborate Responsibly

- 5-1 Collaborate with Business Partners — 26
- 5-2 Source Responsibly — 26

## 5-1

# Collaborate with Business Partners

## **Sony engages third parties who share our commitment to ethics and compliance.**

Sony works with third parties to help us achieve our business goals. We must know who they are. Knowing them helps us comply with applicable laws and reduces the risk of misconduct such as bribery, fraud or money laundering.

For more information, please see: | ➤ [Sony Group Third Party Engagement Policy \(Internal only\)](#)

## 5-2

# Source Responsibly

## **Sony sources fairly and responsibly from trusted suppliers and contractors.**

Suppliers and contractors are critical to our continued success. We build mutual trust and collaborate with our suppliers and contractors. We expect them to know and follow Sony's ethical values, applicable policies and legal requirements. Sony is committed to fair procurement based on objective conditions, such as competitive price, quality, technology and delivery.

For more information, please see:

- [Sony Supply Chain Code of Conduct](#)
- [Sony Group Policy for Responsible Supply Chain of Minerals](#)
- [Sony Music Entertainment Supplier Code of Conduct](#)  
(Applies to suppliers of Sony Music Entertainment)
- [Sony Pictures Entertainment Supplier Code of Conduct](#)  
(Applies to suppliers of Sony Pictures Entertainment)
- [Sony Interactive Business Principles](#)  
(Applies to Sony Interactive Entertainment business partners)

# 6

## Embrace Creativity and Technology

**6-1** Use Technology Responsibly ————— 28

**6-2** Create and Protect Intellectual Property ——— 29

**6-3** Safeguard Confidential Information ————— 29

**6-4** Respect Privacy ————— 30

**6-5** Maintain Information Security ————— 30



## 6-1

# Use Technology Responsibly

### **Sony is committed to the responsible use of technology.**

Innovation and advanced technologies have the potential to bring great value and benefits to people around the world. Sony uses innovative technologies to expand creativity and deliver Kando through our products, services and entertainment. At the same time, we understand that some technologies can carry potential harm. We are committed to ethical development and use of technology, and compliance with relevant laws and policies.

For more information, please see:

- [Sony Group's Initiatives for Responsible AI](#)
- [Sustainability Report / Technology](#)
- [AI Ethics resources \(Internal only\)](#)



### **Sony Group's Initiatives for Responsible AI**

Sony, with the aim of utilizing AI technology to enrich people's life styles and contribute to the development of society, will pursue accountability and transparency while actively engaging in dialogue with stakeholders. We will continue to promote responsible AI in order to maintain the trust of products and services by stakeholders.

6-2

## Create and Protect Intellectual Property

**Sony vigorously defends its intellectual property rights and respects the rights of others.**

Sony's intellectual property is the fruit of our endless pursuit of creativity and technology. We strive to create, and we protect, Sony's intellectual property. We do not knowingly misuse the intellectual property of others or violate their intellectual property rights.

To the extent permitted by law, all inventions and creations generated by Sony employees belong to Sony. We will secure Sony's rights to such inventions and creations in accordance with the law and company policy.

For more information, please see: | ➤ [Intellectual property resources \(Internal only\)](#)



### **Examples of "Sony's Intellectual property:"**

Patents, designs, trademarks, trade secrets and copyrights including compositions, sound recordings, visual works and computer programs.

6-3

## Safeguard Confidential Information

**Sony safeguards confidential and proprietary information.**

Our confidential and proprietary information, and such information entrusted to us from our suppliers, business partners or customers, is vital to our continued success. We must use or disclose any such information within the scope authorized by the company.

For more information, please see: | ➤ [Confidential information resources \(Internal only\)](#)



### **"Confidential and proprietary information:"**

Any important or valuable information that has not been disclosed to the general public, such as: 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.

6-4

## Respect Privacy

### **Sony respects the privacy of individuals and safeguards personal information.**

Our people and stakeholders trust us to protect any personal information we collect while doing business. To earn that trust, Sony has established policies to safeguard and ensure ethical handling of personal information. We must follow these policies when we collect, maintain, use, disclose or dispose of personal information.

For more information, please see:

- [Privacy resources \(Internal only\)](#)
- [Sony Global Privacy Management Policy \(Internal only\)](#)

6-5

## Maintain Information Security

### **Sony protects its information assets and information systems.**

Sony recognizes the importance of information security both in achieving financial success and maintaining the trust of our stakeholders. We must all protect our information and systems by following Sony's information security policies and procedures.

For more information, please see: | ➤ [Information Security resources \(Internal only\)](#)

# 7

## Safeguard Sony's Integrity

<b>7-1</b>	No Corruption	32	<b>7-4</b>	Keep Accurate Records and Reports	34	<b>7-7</b>	Follow Trade Control Laws	36
<b>7-2</b>	Avoid Conflicts of Interest	33	<b>7-5</b>	Make Appropriate Public Disclosures	35	<b>7-8</b>	Follow Tax Laws	36
<b>7-3</b>	Protect Sony's Assets	33	<b>7-6</b>	No Insider Trading	35	<b>7-9</b>	Communicate Responsibly	37

7-1

# No Corruption

## **Sony prohibits corruption in any form, in both the government and commercial sectors.**

Corruption has a negative effect on the communities and economies where we do business. We never give gifts, entertainment or other amenities to obtain an improper business advantage. We comply with all applicable anti-corruption laws. We take care when dealing with government officials. We do not offer, promise, or give anything of value to government officials, directly or indirectly, to seek favorable arrangements or actions by such officials.

For more information, please see:

- [Sony Group Anti-Bribery Policy \(Internal only\)](#)
- [Sony Group Third Party Engagement Policy \(Internal only\)](#)



### **Points to be noted:**

- It is strictly prohibited to bribe government officials.
- All payments to or on behalf of government officials, must be recorded accurately.
- We must seek prior approvals regarding any payments to government officials in accordance with internal policies.
- Government officials include those who work for a local, state/provincial or national government, or a public international organization, an entity owned, controlled and/or funded by the government such as school, hospital and public broadcast companies, and those who are members of a royal family.

If you have any concerns, please contact your legal or ethics and compliance department.

7-2

## Avoid Conflicts of Interest

**We act in Sony's best interests and never allow personal interests to interfere with our work at Sony.**

Using good judgment to make the best choices for our business allows us to pursue our goals without divided loyalty. We don't accept gifts or have financial interests that may adversely impact our loyalty to Sony. We avoid even the appearance of a conflict of interest. We promptly disclose any potential conflicts to our manager for review and approval.

For more information, please see:

- [Conflicts of interest resources \(Internal only\)](#)
- [Gifts and entertainment resources \(Internal only\)](#)



If you have any concerns regarding a potential conflict of interest, please contact your legal or ethics and compliance department.

7-3

## Protect Sony's Assets

**Sony protects its assets from any types of loss or misuse.**

Sony's assets are to be used only for legitimate business purposes and only by authorized Sony employees or their designees. We must not pursue personal benefits using Sony's assets. Sony reserves the right to monitor and inspect Sony's assets, including e-mail, data and files kept on Sony computers or other devices, in accordance with applicable laws.



**"Sony's assets:"**

Tangible and intangible assets, including brand, trademark, know-how, confidential or proprietary information and information systems.



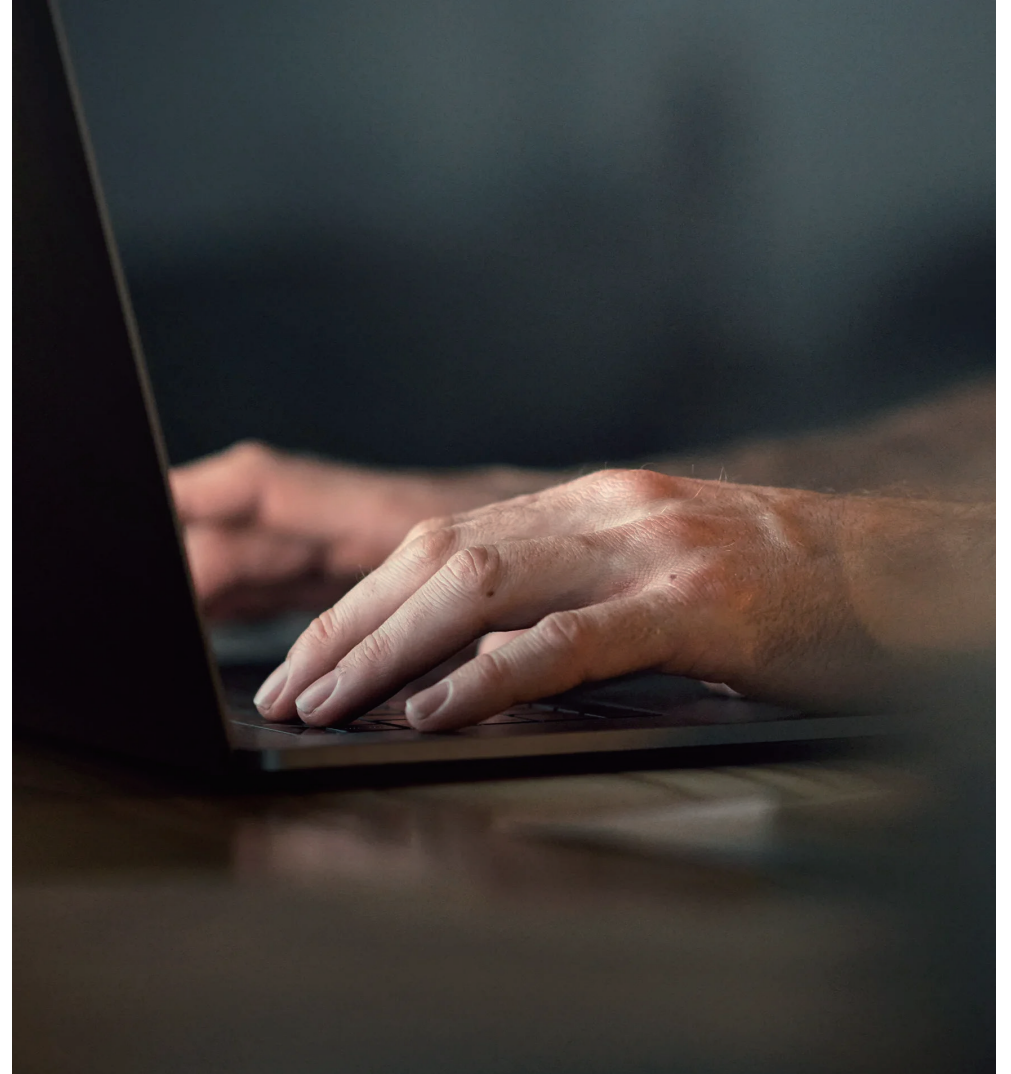
## 7-4

# Keep Accurate Records and Reports

**We ensure that all records and reports are accurate, complete, honest and timely.**

Timely and accurate records and reports help us make sound business decisions. Any information that we record and report must be a fair representation of facts. This includes all internal and external information, whether or not it is related to financial records. We should never cause records to be inaccurate or create records that are misleading or artificial.

For more information, please see: | [▶ Sony Group Record Retention Policy \(Internal only\)](#)



7-5

## Make Appropriate Public Disclosures

**Sony ensures that our public disclosures are fair, timely, accurate and understandable.**

Sony's shares are listed on exchanges in Japan and the United States. Our shareholders and investors rely on our timely and accurate public disclosures to make investment decisions. Sony endeavors to engage in constructive dialogue with shareholders and investors to maintain a relationship of trust. Our shareholders and investors expect us to comply with applicable requirements related to public disclosures. Employees who prepare public disclosures must follow Sony's Disclosure Controls and Procedures.

For more information, please see: [➤ Disclosure Controls and Procedures \(Internal only\)](#)  
[➤ Disclosure resources \(Internal only\)](#)

7-6

## No Insider Trading

**We do not use or share material non-public information to buy or sell stocks or other securities.**

While working for Sony, we may have access to information that is not known to the public. It is illegal and subject to civil and criminal penalties in many countries to trade stocks or other securities while possessing material non-public information about a company, or to share such information with others that could lead them to trade. We must know and comply with Sony's insider trading policies.

For more information, please see: [➤ Global Policy on Insider Trading Prevention \(Internal only\)](#)  
[➤ Regulations for Prevention of Insider Trading](#)  
- [apply to group companies in Japan \(Internal only\)](#)



**"Material non-public information:"**

Any non-public information that a reasonable investor would consider important in deciding whether to trade stocks or securities.

7-7

## Follow Trade Control Laws

**Sony conducts business activities in accordance with trade control laws and internal policies.**

Sony's business activities may be subject to trade control laws, which are intended for maintaining peace and security. These laws prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, regions, individuals or entities. We comply with these laws as well as relevant internal policies.

For more information, please see: | [▶ Sony Group trade control resources \(Internal only\)](#)



**Q.** What should we do when we provide products or technical information to a foreign business partner?

**A.** We should check the applicability of export control regulations to such business partner, and to the products and technical information to be exported.  
In addition, if an export permission from the relevant authorities is needed, we need to obtain such permission prior to our export.

7-8

## Follow Tax Laws

**Sony follows applicable tax laws and regulations wherever we conduct business as well as the common rules and guidance regarding international taxation.**

As a responsible corporate citizen conducting business around the world, Sony understands its obligation to pay taxes, where applicable. While sound fiscal management requires managing our tax burdens, we only do so through legal means. We comply with all such applicable laws and regulations.

For more information, please see: | [▶ Sustainability Report / Policy and Governance Framework on Tax Strategy](#)

7-9

## Communicate Responsibly

**We communicate with the media and others by providing clear and accurate information following prior approval.**

What we say about Sony can impact our reputation. To provide clear and accurate information to the public, only designated departments, such as the Corporate Communications and Investor Relations departments, communicate with the media, securities analysts and others. When communicating with the press, reporters or securities analysts on behalf of Sony, we will obtain the company's prior approval through appropriate means, such as by consulting Corporate Communications and Investor Relations departments.

When privately using social media, we must adhere to Sony's policies, so that we do not give the appearance that we are speaking on behalf of Sony.

For more information, please see: | [▶ Policies for use of social media \(Internal only\)](#)





### 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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**SONY**