

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
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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

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 Country Access code 000-117 and dialing 855-315-0767 after the prompt. 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)

January 25, 2025

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	<ul style="list-style-type: none">• Proactively Address Consumer Needs• Maintain the Highest Standards of Quality
Be Curious and Insightful	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• Come Up with New Ideas• Do Things Differently• Think Solutions• Take Risks• Work with a Sense of Urgency
Collaborate to Win	<ul style="list-style-type: none">• Empower Self and Others• Work Effectively within and Across Teams• Take Accountability
Believe in the Power of Diversity	<ul style="list-style-type: none">• Respect All• Be Inclusive• Value Diverse Viewpoints and Ideas
Embrace Sustainability	<ul style="list-style-type: none">• 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 other. 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., persons 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, 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 advantage 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:

Employees may give gifts to a non-government individual or organization gifts that are customary (e.g. gifts 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. The value of such gifts should not exceed the aggregate value of Rupees twenty thousand only (INR 20,000) per annum to an individual or an organization. If the value of the gifts to be given to an individual or an organization, in a year, exceeds the stipulated amount of Rupees twenty thousand only (INR 20,000), then, the gifts that are exceeding the stipulated limit must be purchased and given only after obtaining prior written approval from the department head, Chief Financial Officer and the General Counsel.

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 gifts, entertainment, or anything of value, in any form whatsoever, regardless of the value of such a gift or entertainment and no matter how nominal it may be, may be given to Government Officials which could be seen as a violation of the FCPA, PCA, the UK Bribery Act and/or the SPE Group Anti-Bribery Policy.

"Government Official" includes representatives of Public Sector Undertakings, Regulatory Bodies, Municipal Corporations, government owned Banks/Financial Institutions, etc., and any person construed to be a 'public servant' under applicable laws.

Any gift, entertainment, donation or comparable benefit(s), or anything of value, if there are occasions or circumstances that require an employee to give such benefit(s) to a Government Official, requires prior written approval from the General Counsel and Chief Financial Officer if the value of such benefit(s) do not exceed an amount equivalent to US\$25. If the value of any gift, entertainment, donation or comparable benefit(s), or anything of value to the same Government Official in any year exceeds an amount equivalent to US\$25, it would require prior approval of Sony Pictures Entertainment, Inc. after the approval of the General Counsel and the Chief Financial Officer.

Accordingly, Employees are required to submit any such request to Ritesh Khosla and Sibaji Biswas 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 gifts, entertainment, or other thing of value to a Government Official and a sufficient lead time is required for the approval or disapproval of such requests.

Under no circumstances may a gift, entertainment, donation or comparable benefit, or other thing of value be purchased and / or given before receipt of the approval.

4.5.2.5 Company Merchandize:

Employees of the Company, with approval from the department head, can give away the Company merchandize (which has Company or any of its divisions' logos prominently placed) for promotional and marketing purposes to non-government third parties and non-Government Officials. As for giving such Company merchandise to Government Officials, employees must follow the process and guidelines prescribed in Section 4.5.2.

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, in order 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 of 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 section of the society. The Company strives to allocate its CSR funds primarily in the areas of 'Environment', 'Empowerment' and 'Education'.

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.

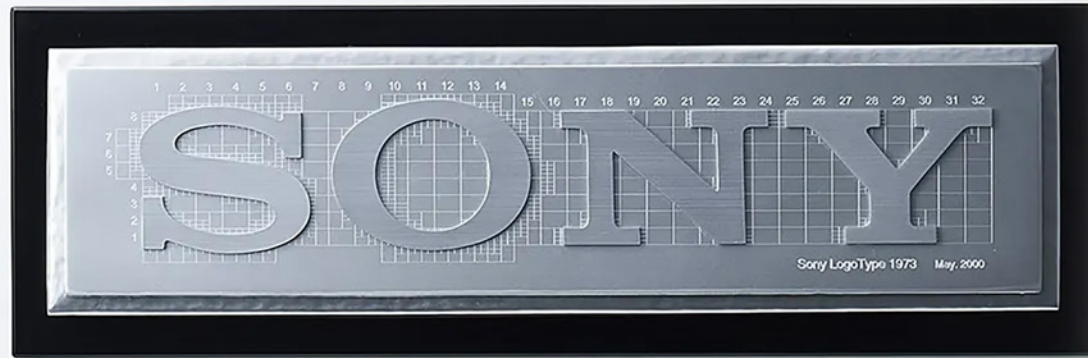
The Company has many resources where employees may raise concerns or report any possible violations of the law or of the Code of Conduct. Employees may do so with any of:

- ✓ Manager or Department/Function Head
- ✓ HR Manager
- ✓ Send an email to myvoice@setindia.com
- ✓ Write directly to the General Counsel and Ombudsperson, Ritesh Khosla
Ritesh.Khosla@setindia.com
- ✓ Drop a note in My Voice Box (anonymous)
- ✓ Call the Sony Ethics & Compliance Hotline at 000-117 then dial 855-315-0767 (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'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."

Chairman and CEO
Representative Corporate Executive Officer
Sony Group Corporation

Kenichiro Yoshida



“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

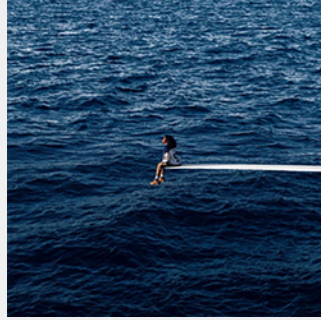
Pursue the creation of the very best by harnessing diversity and varying viewpoints.

Integrity & Sincerity

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

Sustainability

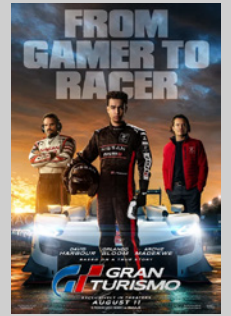
Fulfill our stakeholder responsibilities through disciplined business practices.



©AKIHAMAZI/HOUBUNSHA, ANIPLEX



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.



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1

Earn Trust

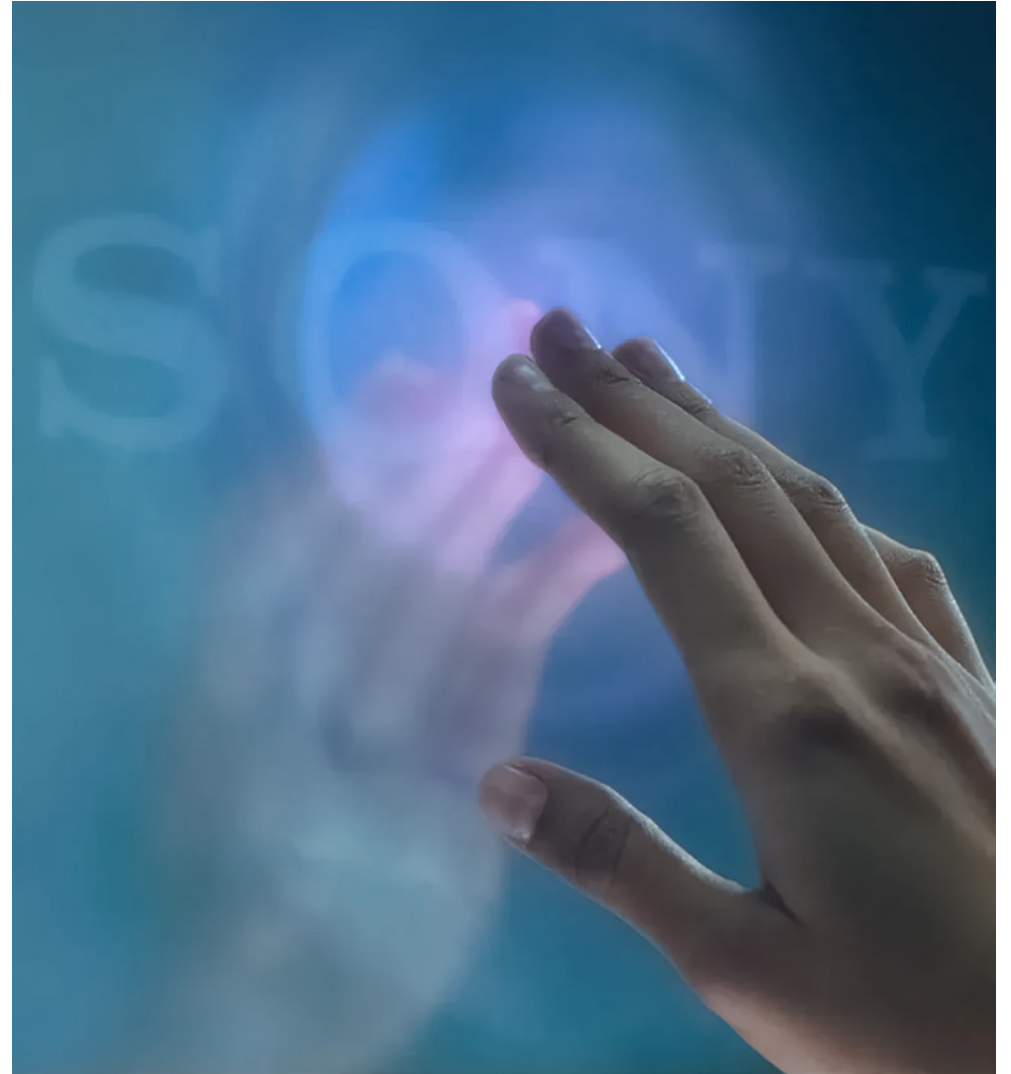
- 1-1** Earn Trust for the Sony Brand ————— 09
- 1-2** Make Sound Business Decisions ————— 11
- 1-3** Speak Up ————— 12

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.

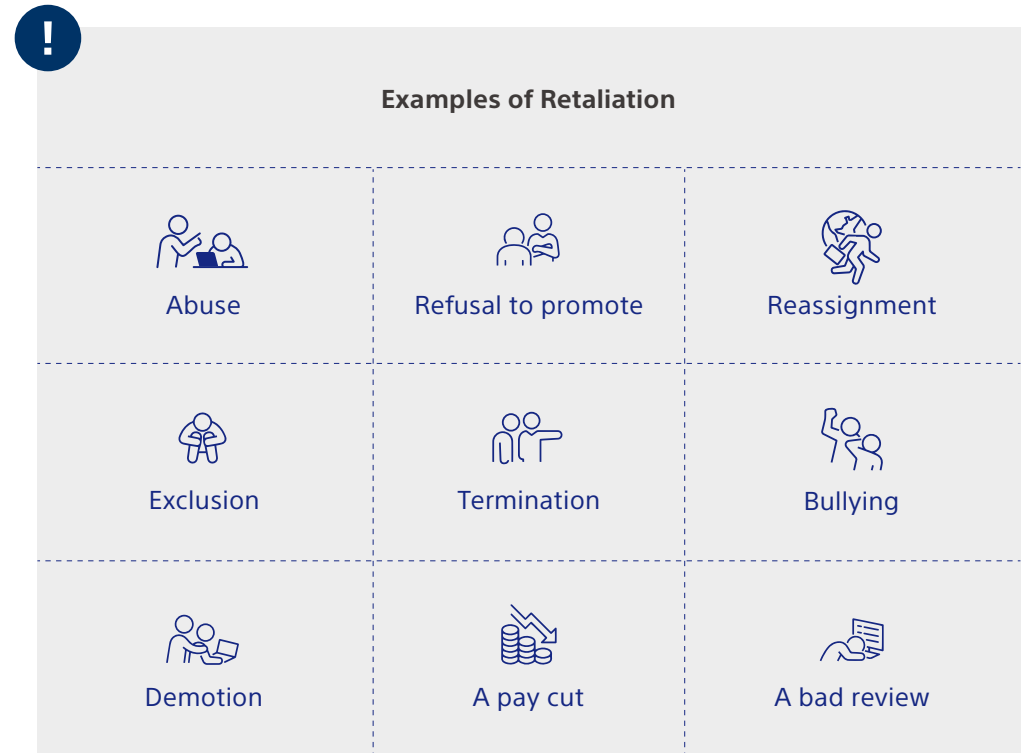
➤ [Sustainability Report / Ethics and Compliance](#)



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.



2

Contribute to the World

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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 Approach to Sustainability](#)

[▶ 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](#)

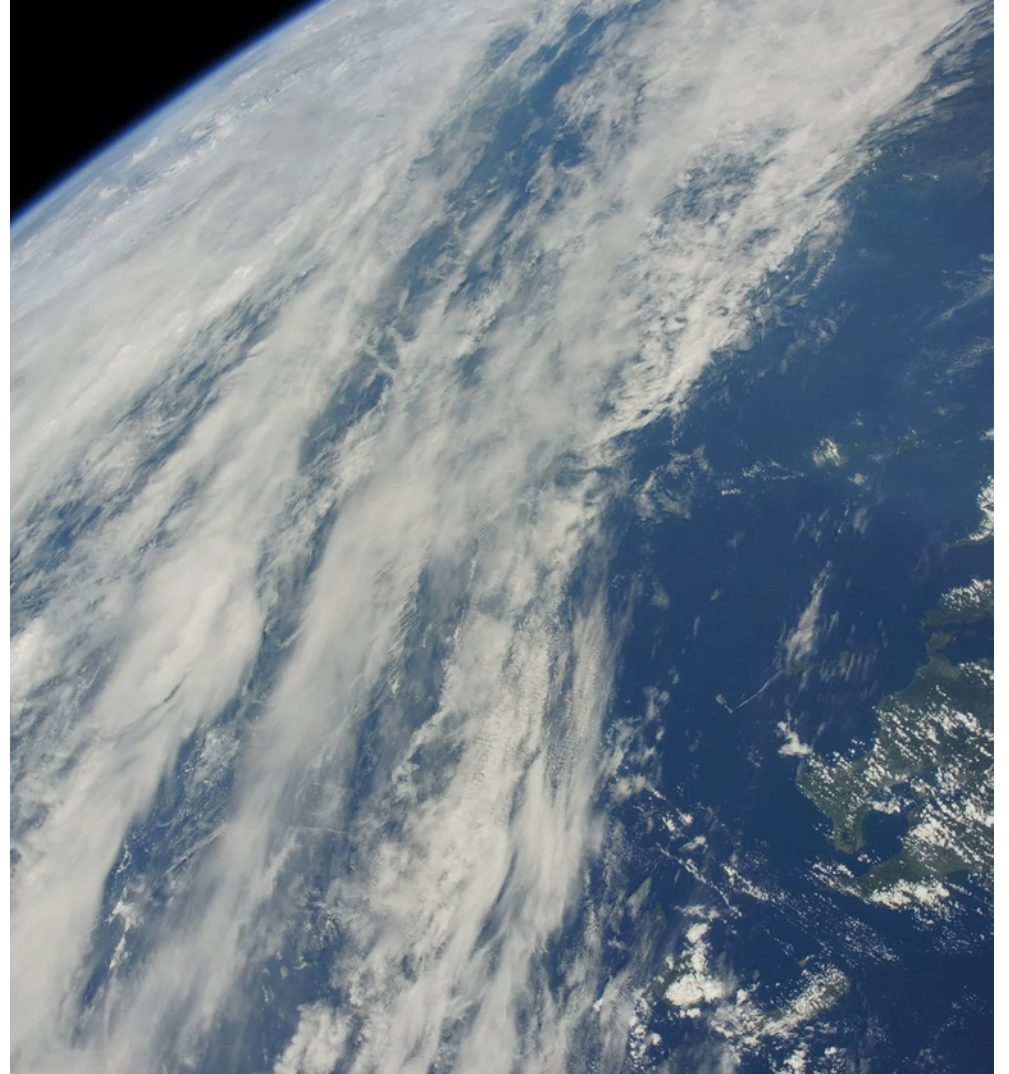


Photo taken by Sony nano satellite "EYE"

3

Empower and Respect People

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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

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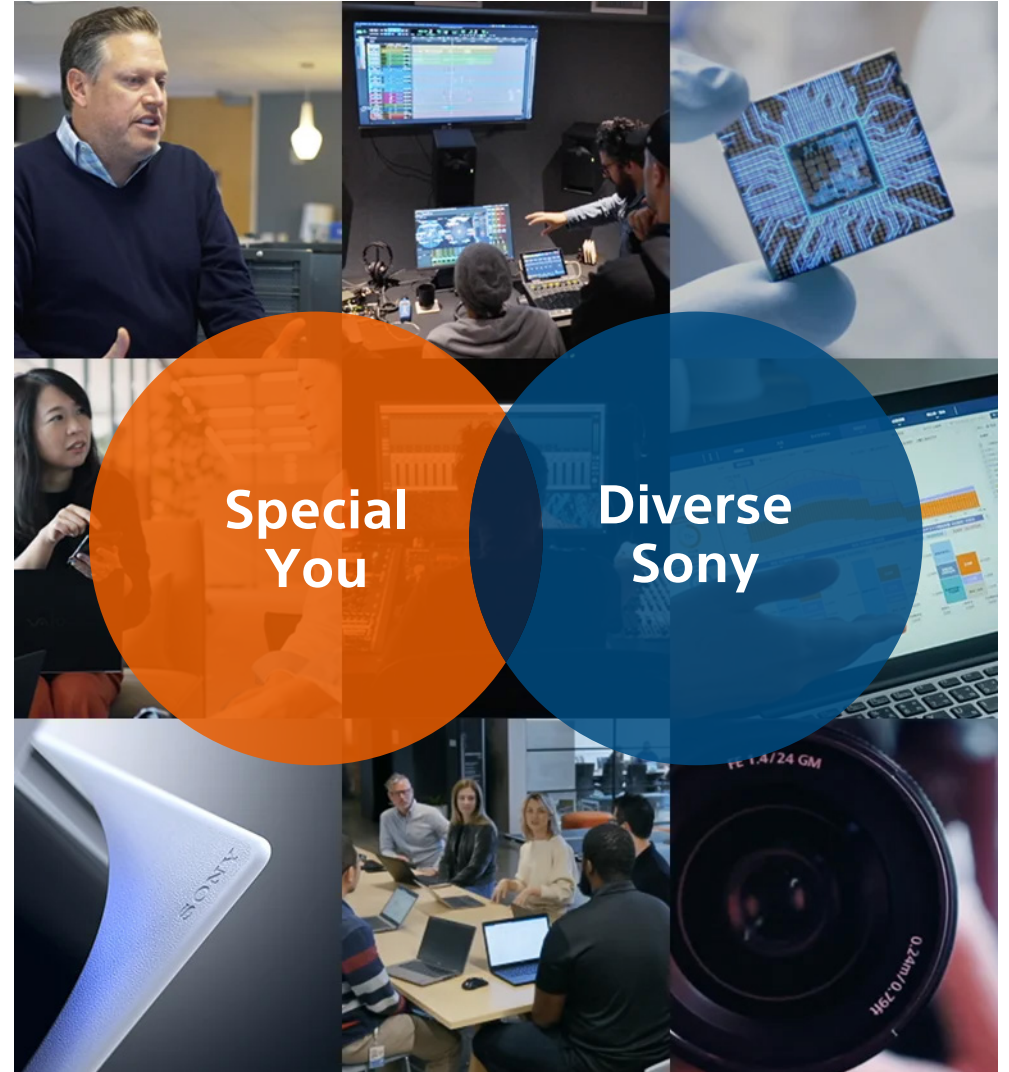
4-1

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

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- 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

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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

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7-3	Protect Sony's Assets	33	7-6	No Insider Trading	35	7-9	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.

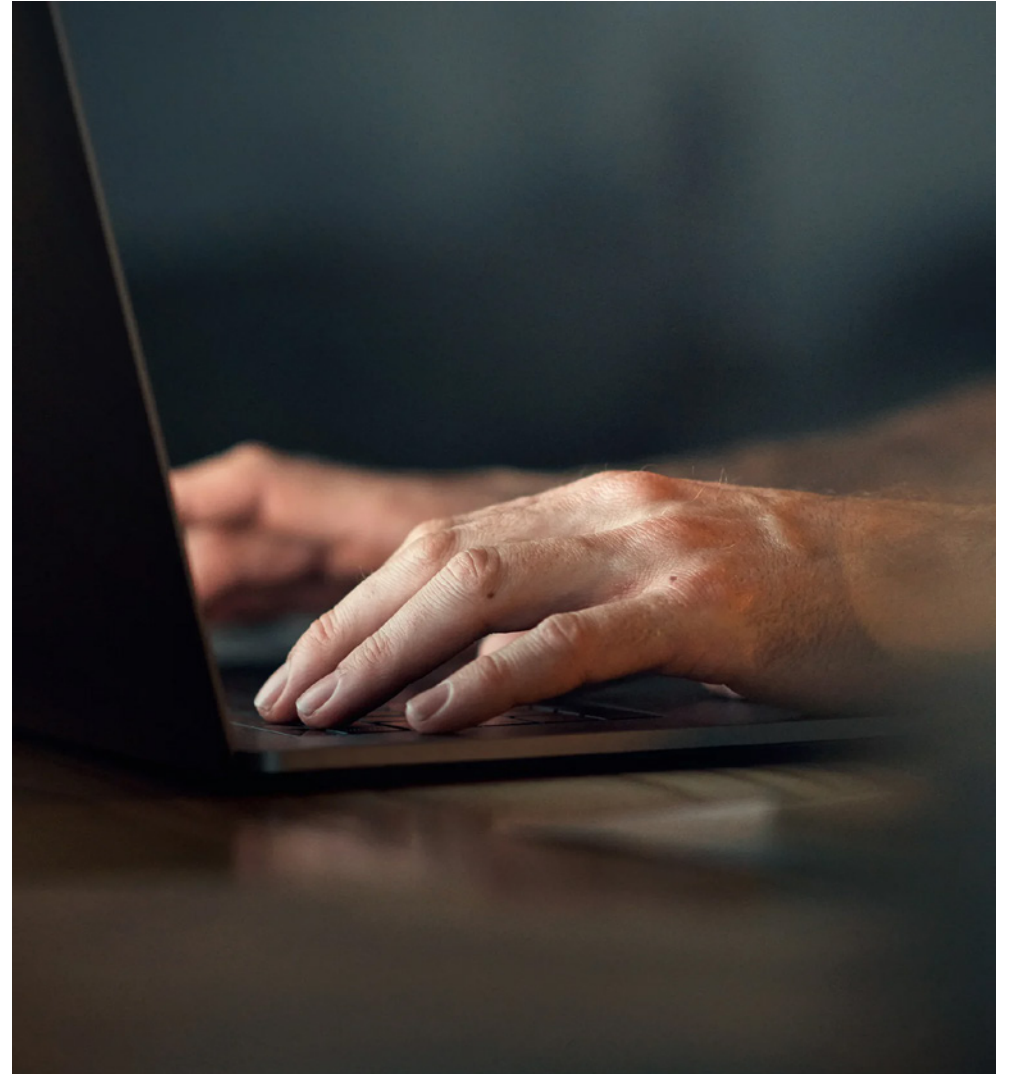
7-4

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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