

Sony Corp.

TICKER
TKS:6758

MARKET CAPITALIZATION
US\$60 billion

HEADQUARTERS
Japan

DISCLOSURES
UK Modern Slavery Act: Yes

TARGETS
None

California Transparency in Supply Chains Act: Not applicable

OVERALL RANKING

17 out of 49

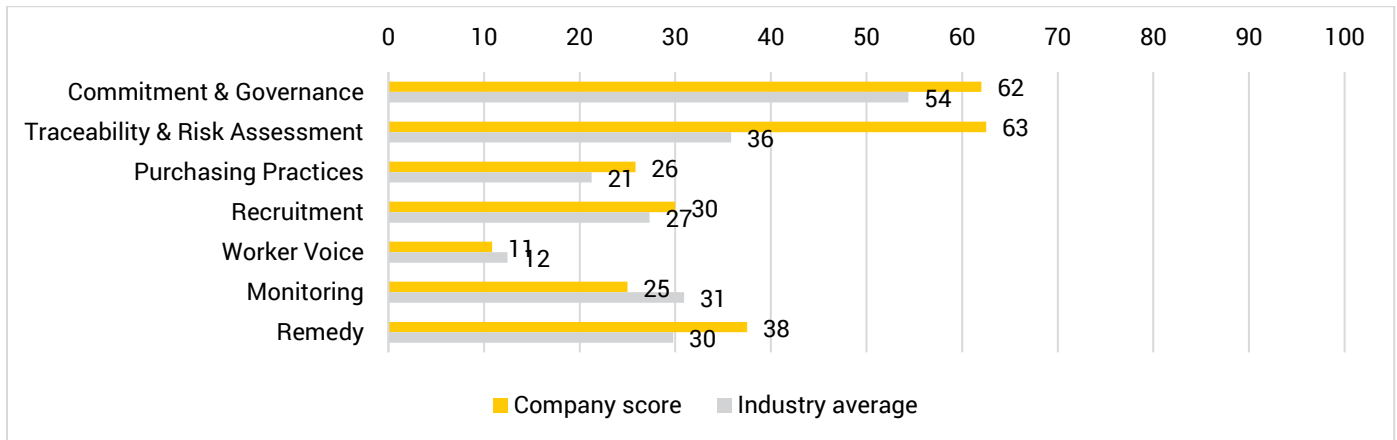
OVERALL SCORE

36 out of 100

SUMMARY

Sony Corp. (Sony), a consumer electronics company and supplier to companies including Apple and HPE, ranks 17th out of 49 companies, disclosing more information on its forced labor policies and practices than its peers on all themes except Worker Voice and Monitoring. Notably, the company has the highest score among the benchmarked Japanese companies on the themes of Traceability & Risk Assessment and Recruitment. KnowTheChain identified one allegation of forced labor in the company's supply chains. The company does not disclose engagement with affected stakeholders nor remedy outcomes for workers. The company has an opportunity to improve its performance and disclosure on the themes of Recruitment, Worker Voice, and Remedy.

THEME-LEVEL SCORES



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#). It includes an [allegation in the company's supply chains regarding forced labor of ethnic minorities transferred from Xinjiang to factories across other provinces in China](#), which falls outside of the research timeframe.

KEY DATA POINTS**SUPPLIER LIST**

No

NO-FEE POLICY

Yes (Employer Pays Principle)

AVERAGE SUPPLIER SCORE

N/A

REMEDY FOR SUPPLY CHAINS WORKERS

No

HIGH-RISK SOURCING COUNTRIESChina, Malaysia¹

LEADING PRACTICES

None.

NOTABLE FINDINGS

Commitment & Governance: Sony discloses that the senior executive officer for CSR and the senior executive officer for production and procurement are responsible for the implementation of its supplier code, which covers forced labor. It further states that its CSR team is responsible for analyzing human rights risks throughout the business and supply chains. The team reports to the CEO of CSR, who works with “procurement, compliance, and employees to manage potential human rights issues related to Sony’s business activities and supply chains.” The company also notes that its procurement staff receive training on responsible procurement that includes how to identify risks of forced labor and how to conduct supplier assessments effectively.

Risk Assessment: Sony reports that it updated its analysis of human rights risks in 2018. It included a review of NGO and media reports on human rights risks in its business areas as well as results of self-assessment questionnaires from its suppliers. The company states that it identified several risk areas, including forced labor and labor conditions of migrant workers.

Recruitment: The company’s supplier code of conduct prohibits worker-paid recruitment fees and, where paid, requires such fees to be reimbursed to workers. The code further prohibits suppliers from withholding ID or immigration documents. Sony discloses that it found that foreign workers’ passports were being withheld at a supplier in Malaysia. It states that it asked that workers be allowed to keep their passports or that they be held but made readily available to workers; these corrective actions were implemented.

OPPORTUNITIES FOR IMPROVEMENT

Recruitment: To avoid exploitation of migrant workers in its supply chains, the company may consider steps to ensure that such fees charged during any recruitment-related process are reimbursed to the workers and/or provide evidence of payment of recruitment-related fees by suppliers if it discovers that fees have been paid by workers in its supply chains. It may also consider providing details of how it supports responsible recruitment in its supply chains (for example, by sharing due diligence findings on recruitment fees with peers or by supporting the development of responsible recruitment schemes).

Worker Voice: To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in which workers in its supply chains are able to pursue alternative forms of organizing. Further, the company is encouraged to take steps to ensure that workers in its supply chains are educated on their rights.

Remedy: The company may consider establishing a process to ensure that remedy is provided to workers in its supply chains in cases of forced labor and human trafficking and disclosing details on this process, such as responsible parties, approval procedures, timeframes, and, crucially, engagement with affected stakeholders. To demonstrate to its stakeholders that it has an effective remedy process in place, the company is encouraged to disclose examples of remedy provided to its suppliers' workers, including with regard to specific allegations.

ENGAGED WITH KNOWTHECHAIN

Yes ([Sent Links](#)).

¹ The US Department of Labor lists China and Malaysia as countries where electronics may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor](#)."