

POLICY AGAINST UNLAWFUL HARASSMENT

Policy Statement

The Company is committed to providing a work environment that is free of unlawful harassment. Company policy prohibits sexual harassment and harassment or discrimination based on race, gender, color, religion, sex, pregnancy, national origin, ancestry, age 40 and older, marital status, physical or mental disability, medical condition, sexual orientation, gender identity, gender expression, citizenship, genetic information, reproductive health decisionmaking, military status, status as a veteran or disabled veteran, or any other basis protected by applicable federal, state or local law or ordinance or regulation. All such harassment is unlawful. The Company prohibits harassment by any employee of the Company, including supervisors and co-workers, or by persons doing business with or for the Company.

Prohibited Conduct

Conduct which is prohibited at the Company, whether or not it rises to the level of unlawful harassment, includes:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs, negative stereotyping or unwanted sexual advances, invitations or comments.
- Visual conduct such as posters, photography, cartoons, drawings on Company premises or circulated in the workplace that denigrate or show hostility or aversion towards an individual or group because of any characteristic identified above.
- Physical conduct such as intimidation, threats, assault, unwanted touching, blocking normal movement or interfering with work because of any characteristic identified above.
- Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors.
- Favoritism in granting any benefit of employment because of a romantic or sexual relationship between a supervisor and an employee.

Retaliation for Having Reported or Threatening to Report, Harassment

Whether or not the offending employee means to give offense or believed his or her comments or conduct was welcome is not determinative. Rather, the Company's policy is violated when another employee, whether the recipient or a mere observer, is in fact offended by comments or conduct which are based on the characteristics identified above.

It is a violation of this policy for males to sexually harass females or other males and for females to sexually harass males or other females. Sexual harassment on the job is prohibited whether committed by a co-worker, a supervisor or manager, or by persons doing business with or for the Company.

Additionally, Company policy prohibits retaliation against an employee who makes a good faith complaint under this policy or who honestly assists an investigation pursuant to this policy.

Complaint Process

Individuals who believe they have been harassed on the job must, as soon as possible, provide a written or verbal complaint to their own or any other supervisor, Production Administration, Employee Direct, or to a Human Resources representative. The complaint should include details of the incident(s), names of the individuals involved, and the names of any witnesses.

Supervisors and managers must immediately refer all harassment complaints to the Human Resources Department, Production Administration, or to Employee Direct at (310) 244-7062 or PO_EmployeeDirect@spe.sony.com.

All incidents of harassment that are reported will be investigated. The Human Resources Department or Company designee will promptly undertake an effective, thorough and impartial investigation of the harassment allegations that provides appropriate due process and reaches reasonable conclusions based on the evidence collected. Reports will be documented and tracked. Investigations will be concluded in a timely manner. The Company will keep complaints under this policy and any resulting investigation as confidential as possible. However, in the course of an

investigation and/or resolving a concern, some dissemination of information to others may be necessary, appropriate, and/or required by law. If the Company determines that a violation of this policy has occurred, it will take appropriate action to deter any future harassment. Where appropriate, disciplinary action up to and including termination will also be taken.

The Company's policy and California law prohibit retaliation against an individual for using this complaint procedure or for filing, testifying, assisting, or participating in any manner in any investigation, proceeding or hearing conducted by the Company or a federal or state enforcement agency.

Employees who believe they have been retaliated against in violation of this policy should report the facts to their supervisor, Production Administration, a Human Resources representative, or to Employee Direct.

All employees and individuals performing services for the Company are expected to comply with this policy and to cooperate with investigations into complaints of harassment.

Additional Enforcement Information

In addition to the Company's internal complaint procedure, the California Department of Fair Employment and Housing (DFEH) investigates and prosecutes complaints of unlawful harassment in employment. Individuals who believe that they have been unlawfully harassed may file a complaint with the DFEH within three (3) years of the alleged harassment. The DFEH serves as a neutral fact finder and attempts to help the parties voluntarily resolve disputes. If the DFEH finds evidence of harassment and settlement efforts fail, the DFEH may file a formal accusation against the employer and harasser. The accusation may lead to either a public hearing before the Fair Employment and Housing Commission or a lawsuit filed on the complainant's behalf by the DFEH.

If the Commission finds that harassment has occurred, it can order remedies including hiring or reinstatement, back pay, and changes in the practices of the involved employer. Employees may contact the DFEH at dfeh.ca.gov. In addition, the address and telephone number of the local office of the DFEH is located in the

telephone directory. Employees of the Company who work outside of California should consult their local state agency charged with administering harassment complaints.

Last updated: January 12, 2023