

Sony Pictures Entertainment Inc.

Supplier Code of Conduct

This document applies to suppliers (collectively, "Suppliers") of Sony Pictures Entertainment Inc. ("SPE") and its majority-owned subsidiaries. Use of the terms "SPE," "we," and "the Company" in this document refer to Sony Pictures Entertainment Inc. or one or more of its subsidiaries, whichever is relevant to the particular Supplier relationship.

SPE expects that all its Suppliers comply with all applicable laws and regulations of the countries and regions in which we operate and to conduct business activities in an honest, ethical and responsible manner. This Code of Conduct for Suppliers sets forth our expectations for doing business with our Company.

This Code contains general requirements applicable to all SPE Suppliers. Particular Supplier contracts may contain more specific provisions addressing some of these same issues. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent any inconsistency exists between this Code and any other provision of a particular contract, the other provision will control.

Conflicts of Interest

If a Supplier's employee is a family relation (spouse, parent, sibling, grandparent, child, grandchild, in-law, or same or opposite sex domestic partner) to an employee of SPE, or if a Supplier has any other relationship with an employee of SPE that might represent a conflict of interest, the Supplier should promptly disclose this fact to SPE or ensure that the SPE employee does so. SPE employees should act in the best interest of the Company. Accordingly, employees should have no relationship, financial or otherwise, with any Supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of SPE.

Bribery

SPE prohibits corrupt practices in any form, including bribery, kickbacks, and other unlawful payments, in both the public (government) and the private (commercial) sectors. In connection with any transaction as a Supplier to SPE, or that otherwise involves SPE, the Supplier must not give or offer to give anything of value (payment, gifts, entertainment, or business amenity), directly or indirectly, to individuals in order to improperly influence them to obtain or retain business, or to secure any improper business advantage. Great care must be taken in dealing with government officials. Suppliers acting on behalf of SPE must comply with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, as well as all local laws dealing with bribery of government officials. Suppliers may not give anything of value to a government official on the Company's behalf (or in the course of interacting with government on the Company's behalf) without prior written approval from Company finance and legal personnel, which can be obtained through the Supplier's primary contact/relationship manager at the Company. In addition to obtaining prior approval, Suppliers must keep a written accounting of all payments

(including any gifts, meals, entertainment or anything else of value) made on behalf of SPE or out of funds provided by SPE. Suppliers must furnish a copy of this accounting to SPE upon request.

Gifts, Meals, and Entertainment

SPE employees are prohibited from accepting anything more than reasonable and modest gifts, meals and entertainment from Suppliers, and are required by our Global Gift Guidelines to record and report in writing any gift, entertainment or favors given to or received by SPE or any of its subsidiaries, whose value (or cumulative value in any one year) exceeds \$250. Ordinary business meals and small tokens of appreciation such as gift baskets at holiday time consistent with customary business practices are generally acceptable, but Suppliers should avoid offering SPE employees travel, frequent meals or expensive gifts. Cash gifts or cash equivalents, such as gift cards, are never allowed. When providing services to the Company or otherwise when acting on the Company's behalf, Supplier's employees are subject to the same limits described in this section when offered gifts, meals or entertainment by Company's customers, Suppliers, or other business partners. If the Supplier is a government official, the Supplier is expected to comply with all applicable laws, rules, and regulations regarding gifts and entertainment.

Protecting Confidential Information

Suppliers should protect SPE's confidential information. Suppliers who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by SPE. Suppliers should not trade in securities, or encourage others to do so, based on confidential information received in the course of providing services to or acting on behalf of SPE. If a Supplier believes it has been given access to SPE's or any other third party's confidential information in error, the Supplier should immediately notify its contact at the Company and refrain from further distribution of the information. Similarly, a Supplier should not share with anyone at SPE information related to any other company if the Supplier is under a contractual or legal obligation not to share the information.

Trade Controls

Both SPE and its Suppliers must comply with applicable trade control laws and regulations. These laws and regulations prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals or entities to secure international peace and security. Suppliers must know and comply with those laws and regulations.

Business and Financial Records

Both the Supplier and SPE must keep accurate records of all matters related to the Supplier's business with SPE. This includes the proper recording of all expenses and payments. If SPE is being charged for a Supplier's employee's time, time records must be complete and accurate.

Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

Reporting Potential Misconduct

Suppliers who believe that an employee of SPE, or anyone acting on behalf of SPE, has engaged in illegal or otherwise improper conduct, should report the matter to the Company. The Supplier can contact the employee's manager. A Supplier's relationship with SPE will not be affected by an honest report of potential misconduct.

Privacy

SPE respects the privacy of individuals, such as customers, employees of Suppliers, and SPE personnel. Suppliers should develop and implement policies and internal rules regarding personal information and observe and comply with all applicable laws and regulations as well as applicable internal rules and policies whenever collecting, maintaining, using, disclosing or disposing of personal information.

Human Rights

SPE believes that all human beings should be treated with dignity and respect. Suppliers should be committed to upholding internationally recognized human rights of all people, including using all reasonable efforts to avoid causing or contributing to adverse human rights impacts that may arise from operations, products, services and/or business relationships and acting diligently to help remediate any impacts that may occur. Additionally, Suppliers must not use any form of forced or involuntary labor where people are forced to work against their will, including forced labor to work off a debt, prison labor or human trafficking. Suppliers also shall not use child labor. "Child" means a person younger than fifteen years old (or younger than fourteen years old where a local law provides for a lower age) or the local legal minimum age for labor, if it is higher. This does not apply to work or service of performers or recording artists, to the extent permitted by local law (for example, a child actor/actress).

Non-Discrimination

SPE values diversity and inclusion in the workplace. Suppliers should be committed to a workforce free of unlawful harassment and discrimination. Suppliers shall not engage in discrimination based on any basis protected by the laws of the jurisdiction in which they operate in hiring and employment practices.

Healthy and Safe Work Environment

SPE is committed to maintaining a healthy, safe and productive work environment. The Company expects its Suppliers to comply with all applicable health and safety laws and regulations to help ensure workplace safety. Suppliers must also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the

workplace, and have suitable programs in place which address topics including occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing.

Environmental

SPE expects its Suppliers to recognize that environmental responsibility is integral to producing world class products and sustaining quality of life for future generations. Suppliers are expected to have suitable programs in place which address topics including environmental permits and reporting, pollution prevention and resource reduction, hazardous substances, solid waste, air emissions, materials restrictions, water management, energy consumption and greenhouse gas emissions.

Responsible Sourcing of Minerals

SPE's Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.