

Specific Instance regarding
Sony Corporation and Panasonic Holdings Corporation
Final Statement

April 24, 2026
Japanese National Contact Point (NCP)
for the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

1 The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

- (1) The OECD Guidelines for Multinational Enterprises (hereinafter referred to as the “Guidelines”), adopted by the Organisation for Economic Co-operation and Development (OECD) in 1976, are recommendations addressed by governments to multinational enterprises operating in or from their territories. The Guidelines provide the voluntary principles and standards for responsible business conduct in a wide range of fields, including disclosure, human rights, employment and industrial relations, environment, combating bribery and other forms of corruption, consumer interests, science, technology and innovation, competition, and taxation.
- (2) Governments adhering to the Guidelines establish the National Contact Points for responsible Business Conduct (hereinafter referred to as the “NCP”). In Japan, the Ministry of Foreign Affairs, the Ministry of Health, Labour and Welfare and the Ministry of Economy, Trade and Industry jointly constitute the Japanese NCP (hereinafter referred to as the “Japanese NCP”), which promotes awareness and uptake of the Guidelines and contributes to the resolution of issues that arise in relation to the implementation of the Guidelines in specific instances.
- (3) While the Guidelines are not legally binding, the Japanese NCP encourages enterprises to observe the Guidelines.
- (4) The Japanese NCP does not determine whether the enterprises’ activities are consistent with the Guidelines. Moreover, regarding the assertions by each party on the issues raised, the Japanese NCP does not make factual findings or judgements on its legitimacy.
- (5) The Japanese NCP may, as necessary, make recommendations on the implementation of the Guidelines and any observations the Japanese NCP deems appropriate to include on the reasons why the proceedings did not produce an agreement.

2 Submission of the Issues

(1) Complainants

The Complainants are Mr. Terrence P. Collingsworth, Mr. Shunji Suga, and five other attorneys (hereinafter referred to as the "Complainants"), representing 251 workers (hereinafter referred to as the "Workers") employed at the factory of Kawaguchi Manufacturing Sdn. Bhd. (hereinafter referred to as "Kawaguchi") in Malaysia.

(2) Enterprises Involved

The Enterprises Involved are Sony Corporation (hereinafter referred to as "Sony") and Panasonic

Holdings Corporation (hereinafter referred to as "Panasonic" and collectively, together with Sony, the "Enterprises Involved"). Both are global corporations headquartered in Japan with multiple affiliated subsidiaries abroad. Their group companies or related entities continuously placed orders for product manufacturing with Kawaguchi.

(3) Overview of the Issues Raised

- A) On 27 December 2024, the Complainants raised issues with the Japanese NCP, alleging that the Enterprises Involved had terminated their contractual relationship with Kawaguchi without taking appropriate measures regarding serious labour law violations and human rights issues affecting the Workers at Kawaguchi, which is part of their supply chain, and had not compensated the Workers for damages incurred. Therefore, the Complainants requested that the Enterprises Involved compensate the Workers for unpaid wages, debts related to recruitment fees and other expenses, and mental damages.
- B) According to the Complainants, the Workers, who are migrants from Bangladesh, were employed by Kawaguchi and engaged in labour at its factory. Their working conditions involved serious labour law violations and human rights issues that persisted for a considerable period, including: (a) several months of unpaid wages; (b) confiscation of passports and delays in visa renewal and other residency procedures; (c) coercion and threats in response to raising grievances; (d) poor living conditions, including overcrowded housing and unhygienic toilets; (e) long working hours and unpaid overtime; (f) debt bondage resulting from high recruitment fees; and (g) threats aimed at preventing the Workers from exposing these issues.
- C) The Complainants cited Chapter II (General Policies, paragraphs A.2, A.12, A.13, and A.15), Chapter IV (Human Rights, paragraphs 1, 2, and 3), and Chapter V (Employment and Industrial Relations, paragraphs 1.d, 1.f, and 4.c) of the Guidelines as the basis for their claim that the aforementioned series of actions by the Enterprises Involved violated the Guidelines.

(4) Requests by the Complainants

The Complainants requested that the Enterprises Involved pay the Workers unpaid wages, debts related to recruitment fees and other expenses, and compensation for mental damages.

3 Views of the Enterprises Involved on the Issues Raised

Sony stated that it had conducted an investigation, including an on-site audit by a third-party auditor, and had concluded that Kawaguchi violated the "Sony Supply Chain Code of Conduct." Sony also stated that it had implemented remedial measures for the Workers.

Panasonic, on its part, stated that it had determined Kawaguchi's treatment of the Workers violated Panasonic's "Panasonic Group Human Rights and Labour Policy" and "Panasonic Supply Chain CSR Promotion Guidelines," and had therefore exercised its leverage to enable Kawaguchi to provide appropriate remedies to the Workers, while also providing remediation itself such as the reimbursement of recruitment fees that had been improperly paid by the Workers.

4 The Japanese NCP's Assistance and the Parties' Initiatives

- (1) The Japanese NCP shared the issues raised and related documents with the Enterprises Involved and explained the specific instance and the NCP process to each of them.
- (2) On 27 June 2025, Sony, one of the Enterprises Involved, submitted a statement to the Japanese NCP outlining its due diligence policy and initiatives concerning this matter. On 2 July 2025, Panasonic, the other one of the Enterprises Involved, submitted a statement explaining its due diligence policy and efforts regarding this specific instance.
- (3) On 17 July 2025, the Complainants informed the Japanese NCP that they reached an agreement with Sony, and therefore they are withdrawing the issues raised. Furthermore, on 22 September 2025, the Complainants reported to the Japanese NCP that an agreement was reached with Panasonic, and consequently, they are withdrawing the issues raised.

5 Conclusion of Engagement by the Japanese NCP

Having received reports from the Complainants that they are withdrawing the issues raised with the Japanese NCP following settlements with the Enterprises Involved, the Japanese NCP issues this final statement, and its handling of this matter concludes with the issuance of this statement. The Japanese NCP commends the efforts of all parties involved in reaching the agreements and for achieving a resolution aimed at building constructive relationships among the parties.