



VENDOR CODE OF CONDUCT



1 Purpose: Why do we have this Policy?

Activision Blizzard¹ (“ABK” or “the Company”) is committed to maintaining integrity and honesty in all aspects of its business. We expect our employees to embody ethical decision-making, which includes treating each other with respect, complying with the laws, rules, and regulations that govern us, and speaking up when we have concerns about whether others are living up to these values. We share a commitment to take personal responsibility for our behavior and to hold others accountable to the standards we set for ourselves. To that end, ABK expects that our business associates – which includes our own vendors, business partners, suppliers, and agents, or their respective sub-contractors, suppliers, and agents – will not only comply with the terms of their agreements with ABK, but will also hold themselves to the highest ethical standards.

2 Adhering to Legal Requirements and Ethical Standards

The Vendor Code of Conduct (“Vendor Code”) outlines specific requirements that serve as a baseline for the behavior we expect from those with whom the Company does business. It is designed to be descriptive, not exhaustive: even if not specifically discussed below, the Company expects that business associates will comply with all laws, rules, and regulations that are applicable to their business in any jurisdiction where they operate, and that their sub-contractors, suppliers, and agents do the same. Business associates should ensure that their employees and partners are aware of their legal responsibilities and adequately trained to act in accordance with both the letter and the spirit of the law.

ABK does not believe that our shared responsibility stops with our legal obligations, but also demands that we act ethically in situations where the law may be silent or unclear. Our employees don’t sacrifice doing the “right thing” for the “fast thing” or the “easy thing,” and we expect those with whom we do business to hold themselves to this same standard of socially responsible behavior. Where the Vendor Code’s requirements are stricter than the local law where you are operating, the stricter provisions of the Vendor Code apply. In the event a provision of the Vendor Code conflicts with local law, local law applies.

ABK intends only to conduct business with people and organizations who act in compliance with the Vendor Code. We expect our business associates to educate employees and sub-contractors about their obligations under the Vendor Code, actively self-monitor their

compliance, and report any instances where they have potentially fallen short.

3 Business Integrity

A. Anti-Corruption & Anti-Bribery

ABK does not tolerate corrupt dealing. Business associates may not provide or receive anything of value in order to secure an improper business advantage. Nor may business associates leverage their relationship with ABK in an attempt to extract a benefit or advantage from any person, public official, company, or entity.

Business associates must comply with all applicable anti-corruption, anti-bribery, anti-money laundering, and anti-tax evasion laws, including but not limited to the Foreign Corrupt Practices Act and UK Bribery Act. Business associates are not to engage in any form of bribery, kickbacks, extortion, embezzlement, or other corrupt behavior with either public officials or private individuals. This prohibition includes using intermediaries or other third parties to pay bribes or kickbacks on ABK’s or the business associate’s behalf, as well as or paying bribes in the form of so-called “facilitation payments” to expedite the performance of public officials’ duties.

Business associates must keep accurate books and corporate records. That means transparently accounting for their business dealings, and not making false, misleading, or incomplete entries.

B. Trade & Customs Regulations

Business associates must adhere to all trade and customs laws and regulations, including all import, export, re-import, and re-export rules, and ensure that their own third parties similarly comply with all applicable trade and customs regulations wherever they do business. These include but are not limited to U.S. Export Administration Regulations, International Traffic in Arms Regulations, and sanctions administered by the U.S. Office of Foreign Assets Control.

Business associates are also prohibited from participating in normally lawful shipping practices in order to illegally evade a country’s customs laws.

C. Antitrust and Fair Competition

Business associates must comply with all antitrust and fair competition laws applicable to them, and must not engage in anticompetitive activities, such as price-fixing, bid rigging, or market allocation. This includes conduct that has the appearance of being anticompetitive or is likely to have an anticompetitive effect.

¹ This means Activision Blizzard, and all of its subsidiaries and affiliates, including but not limited to Activision Publishing, Inc.; Blizzard Entertainment, Inc.; and King Digital Entertainment Limited.

D. Conflicts of Interest & Honest Dealing

Business associates are expected to conduct their business dealings in a fair, honest, and ethical manner, avoiding any actual or perceived conflicts of interest or self-dealing.

Business associates must promptly and accurately disclose to ABK relationships that could create an actual or perceived conflict of interest, including any personal or financial relationships with ABK employees. Disclosures should be made by email to vendorcompliance@activisionblizzard.com.

E. Privacy, Information Security, Data Protection, and IP Rights

Business associates must comply with all applicable privacy and data protection laws and must safeguard and make only proper use of any confidential information shared by ABK. When collecting or processing confidential or personal data, clear and accurate privacy notices must be provided, and valid consent must be obtained where required.

ABK takes seriously the protection of its intellectual property. Business associates must safeguard the Company's intellectual property assets, including trade secrets, patents, trademarks, and copyrighted works. This includes any unreleased information about ABK Games. Business associates must keep in the strictest confidence any and all information shared regarding ABK games, including but not limited to release dates, titles, character names, art, trailers, and any other content and game development information. Business associates are also expected to use only intellectual property that has been legitimately acquired or licensed in accordance with agreed-upon terms of use.

When appropriate, business associates will be provided with ABK's information security policies and will be expected to follow these policies whenever they are working on ABK intellectual property, assets, data, or infrastructure or other materials. Upon request, business associates shall provide ABK with evidence of their information security measures and training provided to their personnel.

F. Truth in Advertising

Business associates must comply with all applicable marketing and advertising requirements, and ensure that any promotions, sales materials, and product claims are truthful, accurate, and not misleading.

G. Speaking for ABK

Business associates may not speak to the press or public on ABK's behalf without express written authorization by the Company.

4 Human Rights & Fair Working Conditions

A. Anti-Discrimination & Anti-Harassment

Business associates must provide a workplace that is free of bullying, bias, harassment, intimidation, or discrimination. Business associates must not engage in any unlawful discrimination or harassment, including any form of sexual harassment. In all dealings with ABK, business associates may not discriminate on the basis of any of the following characteristics, which ABK considers to be "protected characteristics" under its policies:

- Race; color; and traits historically associated with race, such as hair texture and protective hairstyles;
- Religion;
- Sex or gender; pregnancy, childbirth and related medical conditions; lactation/chestfeeding; reproductive health decisions; family responsibilities; and child support obligations;
- Marital status; domestic partner status; use of surname; familial status; and place of residence or homeless status;
- Sexual orientation; and gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), and gender-related appearance or behavior;
- National origin and ancestry (including possession of a driver's license issued to persons unable to prove their presence in the US is authorized under federal law); language, accent, or English proficiency; citizenship; immigration status; work authorization status; or place of birth;
- Genetic Information, DNA sampling/testing, and sickle cell trait;
- Physical or mental disability; HIV/AIDS status or HIV testing; hepatitis C status; obesity; height and weight; and body conditions;
- Age;
- Military or veteran status;
- Crime victim status, including status as victim of domestic violence; or
- Any other status protected by applicable law.

B. Supplier Diversity

We're in the business of creating worlds, and we have the responsibility to create worlds where everyone can see themselves, and everyone can be themselves. At ABK, representation is a business imperative.

Supplier diversity is a strategic element within that imperative - building a diverse cross-section of suppliers of materials, equipment, goods, and services

used by ABK. Having an inclusive, diverse supplier network strengthens our company by encouraging innovation, competition, and continuous improvement.

We are committed to having equitable and transparent processes for all companies to become suppliers or subcontractors. We hope that our suppliers share in our values of global representation and transparent processes that provide equal access to opportunity.

C. Health & Safety

The workplace should be a safe and healthy place for employees, both physically and psychologically. Business associates are expected to comply with all relevant local health and safety laws and regulations, to utilize a health and safety management program in their workplaces, and to abide by ABK's security and safety policies when working at one of the Company's locations. If employees are provided with housing or transportation, it must be clean and safe.

Business associates shall not subject any worker to unreasonable physical or mental coercion. Corporal punishment in any form is unacceptable.

D. No Compulsory Labor

Business associates shall not use compulsory labor under any circumstances, or work with any person or entity that uses compulsory labor. This includes prison labor, indentured labor, bonded labor, trafficked persons, enslaved persons, and any other form of forced labor.

Business associates must comply with all modern slavery and trafficking laws applicable to them.

E. No Child Labor

Child labor shall not be used under any circumstance. That means, to the full extent permitted under the law, business associates shall not employ anyone under the age of 15 or the local legal age limit, *whichever is greater*, to perform any work for the Company or work in any facility that produces goods or merchandise for the Company.

ABK encourages the creation of internship or apprenticeship programs that are tied to formal education for young people. But the Company will not do business with those who use these types of programs in a fraudulent or inappropriate manner, or who exploit or endanger the health and safety of participants.

F. Fair Compensation

Working conditions should be safe, humane, and productive. Workers must be fairly compensated for their duties.

Business associates must set working hours, wages, and overtime pay in compliance with all applicable laws, and require that sub-contractors and third parties

working on their behalf do the same. Workers must be paid at least the minimum wage applicable to them by law.

If workers work overtime, they must be paid for that overtime consistent with applicable laws. Business associates must ensure that any worker overtime does not lead to unsafe or inhumane working conditions.

G. Freedom of Association

Business associates must recognize the right of employees to choose whether or not to affiliate with legally sanctioned organizations or associations without unlawful interference. Workers should not be intimidated, harassed, or face reprisal for exercising this right.

Please note that nothing in this Vendor Code restricts individuals from engaging in any conduct, communication, or behavior that is protected by law, including for example, the right of employees in the United States under the National Labor Relations Act to communicate about wages, hours, or other terms and conditions of employment.

5 Environmental Sustainability and Stewardship

A. Laws & Regulations

Business associates shall comply with the environmental laws, regulations, and international treaties relating to environmental protection that are applicable to them, including those that regulate hazardous materials, air and water emissions, and waste.

B. ABK's Science-Based Targets Commitment

As part of ABK's commitment to the Science Based Targets initiative, business associates may be requested to periodically report their decarbonization targets to the Company.

C. Greenhouse Gas (GHG) Emissions Reporting & Reductions

ABK has committed to near-term GHG emissions reductions and Net Zero emissions by 2050. The Company expects its business associates to track, document, and seek to minimize energy consumption and GHG emissions, and seek ways to improve energy efficiency and use carbon free energy wherever feasible.

Business associates are highly encouraged to measure and publicly report their Scope 1, 2, and 3 GHG emissions. Upon request, business associates will provide timely reports to ABK on their Scope 1 and 2 GHG emissions

stemming from their operations, products, and services related to their work for the Company.

D. Pollution and the Circular Economy

Vendors are encouraged to identify, manage, and reduce the risk of environmental hazards from their operations, including both waste (hazardous and non-hazardous waste, electronic waste) and pollution (air pollution, effluent discharge, contamination of stormwater).

Across their operations, vendors should work to reduce consumption of resources, including raw materials, energy, and water.

E. Responsible Sourcing of Minerals

Business associates must ensure the responsible sourcing of minerals in their products and operations and shall not knowingly use minerals that contribute to conflict, human rights abuses, or environmental harm. These minerals include, but are not limited to, columbite-tantalite (coltan), cassiterite, gold, wolframite, tantalum, tin, and tungsten. ABK expects business associates to implement supply chain due diligence processes to identify the sources of these conflict minerals and support efforts to eradicate the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or any adjoining country, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Upon request, business associates will provide ABK with accurate and complete information about the origin and chain of custody of minerals in their products and operations.

6 Reporting Unethical Conduct or Potential Violations

Business associates are expected to provide their employees with avenues to report potential concerns including an option to do so anonymously. Upon learning of a suspected violation of the Vendor Code, business associates must promptly report the concern to us. It is important that our partners raise concerns at the earliest opportunity. It is not enough, for example, to wait until a regulatory investigation has commenced or a violation of law has been established before reporting it.

In short: business associates should not attempt to filter or gatekeep concerns before they are raised to ABK.

ABK's Ethics & Compliance Team maintains and actively monitors a mailbox where reports should be sent: vendorcompliance@activisionblizzard.com. Business associates and their employees may also use this mailbox to report concerns of misconduct on the part of ABK employees with whom they interact. Business associates are expected to inform their employees, sub-

contractors, and those working on ABK business of this reporting avenue. Business associates should not take any action to discourage employees from directly reporting concerns to ABK.

The Vendor Code does not restrict business associates or their employees from reporting concerns to the appropriate federal, state, or local authorities.

7 Non-Retaliation

ABK does not tolerate retaliation of any kind in response to a good faith report. That means that ABK will not subject a business associate or third party to any adverse action in response to reporting a concern in good faith. And it also means that we expect that business associates will protect their employees from any form of retaliation from raising a concern or assisting in an investigation and will not tolerate a business associate subjecting anyone who reports a concern to any adverse consequences for raising a concern in good faith.

8 Controls, Compliance, and Oversight

We take seriously any concern raised in good faith and work to investigate those concerns in an efficient and timely manner. Concerns are kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

In addition to investigating concerns that are directly reported to us, ABK or its representatives may conduct audits or reviews to ensure that business associates are in compliance with the Vendor Code. Business associates must cooperate fully with any audit or investigation, including providing ABK or its representatives with timely access to relevant facilities, offices, employees, and records. ABK shall bear the cost of the audits or investigations unless material non-compliance is found, in which case the business associate shall bear the cost.

If a business associate fails to comply with one or more of the provisions of this Vendor Code, ABK shall have the right to determine any corrective measures that may be required to continue the business relationship, or to immediately terminate any and all agreements with the business associate and its affiliated companies. Additionally, such compliance failure may result in the business associate's civil liability and criminal prosecution under the law of the appropriate jurisdiction.

Certification

I have read and understand ABK's Vendor Code of Conduct. I acknowledge and agree to adhere to its guidelines. I further understand that any failure to comply with one or more of the guidelines contained in the Vendor Code of Conduct may result in the immediate termination of my business relationship with the Company or any other remediation the Company deems appropriate and my civil liability and criminal prosecution under the laws of the appropriate jurisdiction.

ACKNOWLEDGED AND AGREED:

Date: _____
_____ (Name of Entity)

By: _____

(Print Name)

Title: _____

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