

CODE OF CONDUCT: THE RIGHT WAY2PLAY



ACTIVISION, BLIZZARD, AND KING CODE OF CONDUCT: THE RIGHT WAY2PLAY

Wherever you are in the world right now, regardless of your team or specific job title in the Activision, Blizzard, and King universe, we all share the same ethical foundation - our Code of Conduct. It guides us to live by our values and do business the right way for our community - fellow employees, gamers, fans, customers, business partners, and everyone who is part of what we do. We share a commitment to this ethical foundation and are proud to hold ourselves to these standards of conduct.

You can learn more by diving into each chapter of our Code (see chapter headers in bold below).

By acknowledging this agreement, I commit to:

[The Right Way2Play](#), which includes complying with all laws, regulations, and guidelines. If I don't understand these rules, I commit to reaching out for help.

Setting the tone, doing the right thing, and escalating concerns, with an elevated duty if I am a People Leader.

[Respecting Each Other](#), which means always treating others fairly and with dignity. I commit to speaking up if I become aware of any harassment, discrimination, or unfair treatment of others.

Playing safe, which means doing my part to foster both physical and psychological safety at work.

[Acting With Integrity](#), Responsibility and Creativity. I commit to creating a workplace culture where others can live by these shared values.

Reporting concerns when I see something that I think is not right. I know where to find the **[ASK List](#)**, which gives me options in how and where to report any type of concern.

Doing my part to create a speak up culture, which includes never retaliating when someone voices a concern. If I ever observe or experience retaliation, I commit to notifying someone on the **[ASK List](#)** about it immediately.

[Maintaining Trust](#) by treating all records with care and not using my position at the company to an unfair advantage.

[Protecting Our Fans, Customers and Business](#), which includes appropriately handling confidential information, avoiding actual or perceived conflicts of interest, and exercising good judgment when engaging in social media. We commit to being honest in our marketing, respecting privacy laws, and maintaining our company's standards for quality and safety in our products.

[Working With Our Business Partners and Communities](#) by playing fair, competing with integrity, and respecting human rights.

Playing cooperatively and transparently if an action at work is being investigated.

Remember, the Code of Conduct is not intended to prohibit or infringe on an employee's rights to discuss wages, hours, working conditions, or other terms and conditions of employment or to otherwise engage in protected concerted activity under Section 7 of the National Labor Relations Act. Nothing in the Code of Conduct or in any other policy is intended to prevent you from providing information to government regulators or authorities regarding potential or actual violations of law.

Our Code: The Right Way2Play

Remember, "Activision, Blizzard, and King" means all of the subsidiaries and business units within the Activision, Blizzard, and King universe, including Activision, Blizzard, King, and each of our studios. Activision, Blizzard, and King operate as wholly owned subsidiaries of Microsoft. Because Activision, Blizzard, and King have global operations, there are some local laws that may require us to take different steps from those that are outlined here. Plainly put, if there is a conflict with internal policy, this Code applies. If there is a conflict with local laws, local laws apply.

Our **Activision, Blizzard, and King** Code of Conduct is the Right Way2Play. In it you'll find important guidelines to work with integrity, ways to report something if you have a concern, and links to policies with more information. Remember, it's everyone's responsibility to act ethically. Our [Way2Play Team](#) of ethics and compliance experts are here to support you along the way.

Living Our Values

Our shared values guide us in everything we do. We celebrate the diverse and unique teams across our global business, each with their own ways of working together to get things done. But remember that we also *all share* three overarching values:



Responsibility

– See it, do it, own it

We believe in taking the lead, jumping in, lending a hand, owning the problem and the solution.



Creativity

– Find the best way

Constantly ask "is there a better way?" But understand that creativity doesn't mean change for the sake of change.



Integrity

– Do the right thing

Don't sacrifice the "right thing" for the "fast thing" or the "easy thing."

We All Play by the Same Rules

It doesn't matter if you are a studio head or an art intern on your first day – the rules described in this Code apply to every single person at every level and in every part of the organization. The Code applies whether you are a full time or part time employee, contingent worker, consultant, or intern. We all work together, and we're all expected to follow our Code – doing the right thing, speaking up when we see something that isn't right, and admitting when we've made a mistake.

People Leaders: Set the Tone for the Right Way2Play

We're all expected to be role models in living our Code, standing up for what's right, and speaking up if things go off track. If you are a People Leader, you have an elevated responsibility to set the tone and do the right thing. It's an important part of your job to:

- **Make our Code a priority.** Emphasize its importance, make sure your team gets the training they need, and check in regularly with your team to live by our Code and policies.
- **Be accessible.** Let your team know that they can come to you (or anyone on the [ASK List](#)) whenever they have questions, concerns, or something to report. Sometimes a team member may prefer to share a concern with someone other than you, and that's okay.
- **Just ask!** Even though you are one of the go-to people for questions about the Code, you're not expected to have all the answers. Just turn to the [ASK List](#) whenever you're unsure about something.
- **Escalate.** You have a special responsibility when you observe or suspect a concern, or someone comes to you with a concern. We need you to take that concern and the person who reported it very seriously. People Leaders may be subject to disciplinary action, not just if you violate this Code, but also for ignoring or condoning behavior that may violate this Code. When the topic of concern is potential discrimination, harassment, or related retaliation, you must make your best effort to report immediately but no later than within seventy-two (72) hours of becoming aware of a concern via any mechanism on the [ASK List](#).
- And of course, **walk the talk!** It's crucial that you lead by example in living our Code. We know this isn't always easy, and it takes practice. Your [Way2Play Team](#) is ready to help if you ever need guidance.

Find out more.

For information about how to report a concern, see the "[Acting with Integrity](#)" chapter.

The Law: Always Follow It, Everywhere

Everyone in our company must comply with all of the laws, rules and regulations that apply to our business wherever we do business – in every city, state and country. And no, you don't need to know the details of every law related to your area of responsibility by heart. Your job is to act with integrity and know when to get in touch with the [Way2Play Team](#) or a member of the [ASK List](#). If you're ever unsure about what to do – or have questions about whether something is legal and respectful in any location – it's always best to ask!

Each of Us Must Take Responsibility

In the end, it all comes down to the choices we make in how we act. We all share the same commitment: to take personal responsibility to know our Code and policies, and make sure we live by them. This means everything from asking that one extra question, to being the ally in the room, to reporting a concern.

1. Respecting Each Other

We strive for trust, respect, and dignity in everything we do. Our people are the most important part of our organization, and we succeed when each one of us feels safe and included to bring our creative best to work. This chapter is all about how we foster a work environment where integrity and responsibility drive our interactions, so all of us can thrive.

Harassment or Bullying: Don't Do It

It comes down to one simple, yet important word: Respect. We all want a workplace that feels safe and comfortable when we interact with each other. We must work well together to achieve our goals. Each of us is expected to do our part to create a respectful workplace culture – one that is free of bullying, bias, harassment, intimidation, or discrimination.

We prohibit these actions in any form – physical, verbal, or non-verbal – including:

- Verbal conduct such as threats, epithets, derogatory comments, jokes, or slurs about a person's race, medical condition, or family life;
- Visual conduct such as displaying derogatory posters, photographs, cartoons, drawings, websites, and emails. Also, consider things like screensavers, passwords that multiple people need to use, memes, and GIFs;
- Physical conduct such as assault, unwanted touching, blocking normal movement, or derogatory gestures;
- Quid Pro Quo sexual harassment, like unwanted advances, requests for sexual favors, or visual, verbal or physical conduct of a sexual nature when submission to or rejection of the conduct is used as the basis for employment or work assignment decisions affecting the individual;
- Hostile Work Environment: Conduct that has the purpose or effect of unreasonably interfering with work performance or creating an intimidating, hostile, or offensive working environment and is based on a **protected characteristic**;
- Repeated degrading, derogatory, or insulting remarks;
- Verbal abuse or profane language directed at an individual;
- Intimidating or humiliating behavior in the form of verbal or physical conduct; and
- Intentional targeted isolation.

A protected characteristic may vary depending on where in the world you are working, but may include: gender, race, color, nationality, national or ethnic origin, ancestry, citizenship status, age, religion, creed, belief, political or trade union affiliation, military or veteran status, sexual orientation, marital or civil partnership status, pregnancy or maternity, physical or mental disability, medical condition, gender identity, 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. Please refer to the policy applicable to your job location or consult your HR partner for further details.

Note that the types of conduct prohibited in the Code are generally broader than those prohibited by law.

Find out more

Check out our [Workplace Integrity Policy](#) or contact/report to your manager, your local HR partner, or another contact on the [ASK List](#).

Diversity and Non-Discrimination: Respect Differences

Diversity is one of our greatest strengths as a company. With our unique talents and great mix of people, we spark innovation, create stronger teams, and stay ahead of our competition. And it's up to each one of us to help maintain an inclusive work environment that fosters respect and reflects the diversity of the communities where we operate. Our company prohibits discrimination or making employment-related decisions on the basis of a person's legally protected characteristic.

Be Safe

Drugs and Alcohol: Know the Policy

Building relationships and socializing at work can be an important part of a great culture, but we must keep our workplace safe, inclusive, and enjoyable for all. No alcohol is permitted at Activision, Blizzard, and King offices, and no one is permitted to drink while working. It's also never okay to possess, use, or be under the influence of illegal drugs while on the job. Abusing drugs or alcohol at work, or before work, can lead to safety issues, damage your business relationships, or hurt your productivity and innovation.

Get to know our [Drug & Alcohol Policy](#) and notify the [Way2Play Team](#) or anyone on the [ASK List](#) if you're ever concerned about someone's use of drugs or alcohol at work.

If you or someone you know needs help fighting alcohol or drug addiction, there are resources available. Check out your [local benefits resources](#) to learn more.

Violence: It's Never Okay

Violence is prohibited. Period. This includes threats, intimidation, or any act of violence whatsoever. In addition, the company prohibits possession of dangerous or unauthorized materials, such as weapons or explosives, in the workplace. If you ever encounter or hear about workplace violence or threats of workplace violence, contact someone on the [ASK List](#). If someone is in immediate danger, do not hesitate to contact the local authorities. You may also contact our [Global Physical Security and Safety \(GSS\)](#) team for support.

Gambling on Esports: Don't Create Risk

Gambling on Esports can create integrity risk for you - and our company. Check out the [Esports Gambling Policy](#) to learn more about what is not allowed in this area.

Workplace Laws: We Follow Them

We comply with all applicable workplace laws. This can be a complex area, so always reach out to someone on the [ASK List](#) if you have questions. Of course, we don't tolerate retaliation against employees for asking questions or attempting to invoke their rights under applicable laws.

What's the Right Way2Play?

Consider this scenario:

“My team loves to joke a lot, but recently I’ve noticed a few people making explicit remarks about one of the people on our team and their dating life. They don’t seem to mind, but it’s making me uncomfortable. Is this a problem?”

The Right Way2Play:

“Yes. It’s important to speak up. Making explicit remarks is a violation of our Code. If you are a People Leader, you have an elevated responsibility to say something. Inappropriate comments about people’s personal lives could escalate to other bad behavior, so bringing awareness to it immediately matters. Reach out to anyone on the [ASK List](#) or learn more about bystander intervention in the [Workplace Integrity Policy](#).”



Remember, the Code of Conduct is not intended to prohibit or infringe on an employee's rights to discuss wages, hours, working conditions, or other terms and conditions of employment or to otherwise engage in protected concerted activity under Section 7 of the National Labor Relations Act.

2. Acting With Integrity

This chapter covers guidance on the Right Way2Play: it's how we live our Code. Our ethical culture is created by all of us. We all have the responsibility to not only react when something's wrong, but also step up and speak up to keep things right. Keep reading to learn more on getting guidance and making reports.

The ASK List: Where You Can Go for Help

The [ASK List](#) is your key go-to resource. It's a list of people and resources that you can turn to if you have questions, need some advice, or want to report something. You can choose whatever channel or resource makes you the most comfortable. No matter the circumstances, you can reach out to anyone on the ASK List:

- Your manager
- Another manager you trust
- Any member of the Way2Play Team directly or at way2play@activision.com
- Any member of HR (or you can reach HR at 877-225-4702 within the U.S. or at HR@activision.com from anywhere in the world)
- Any member of the Law Department
- The Integrity Line (1-877-WAY2PLAY or 1-877-929-2752) within North America or way2play.ethicspoint.com from anywhere in the world

You can always reach out to your [Way2Play Heroes](#) for guidance about your reporting options.

We want you to understand more about the [Integrity Line](#) so you can decide if it is the right option for you. The Integrity Line is a confidential website and telephone line, operated by an external third-party vendor, which allows you to report concerns 24 hours a day. If you prefer, the Integrity Line allows you to report concerns anonymously. However, providing your name allows us to contact you directly, while still protecting your confidentiality to the extent possible; it also allows us to ask you for further information as we investigate your concerns and may impact our ability to respond and expedite the time it takes us to do so.

You can reach the Integrity Line by:

Telephone:	o North America 1-877-WAY2PLAY (877-929-2752)	o Ireland 1800851838	o Poland 800005301
	o Australia 1800 161 117	o Japan 0120-406-357	o Singapore 8004922537
	o Brazil 0800 000 0474	o South Korea 00798 14 203 0354	o Spain 900838616
	o China (Mainland) 4001200531	o Malta 8006 5047	o Sweden 020 089 00 22
	o France 0 805 62 01 53	o Mexico 8006815321	o Taiwan 00801-49-1714
	o Germany 0800 1819538	o Netherlands 0800 0229506	o UK & Northern Ireland 0800 046 5502
		o New Zealand 0800 420 067	
Internet:	o way2play.ethicspoint.com		

Reports submitted through the Integrity Line are automatically directed to members of the Way2Play Ethics & Compliance team and may be escalated as appropriate.

Note that any of the reporting options on the ASK List can be used for reporting any types of concerns. We hope you trust our process for handling matters internally, but please know that nothing in our Code prohibits you from reporting any illegal activity, including any violation of the securities laws, antitrust laws, environmental laws or any other federal, state, or foreign law, rule or regulation, to regulatory or government authorities. Employees, officers, and directors shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee because he or she reports any such violation.

Get to Know Your Way2Play Heroes

While creating a safe and inclusive culture is everyone's responsibility, the Way2Play Heroes on our team go the extra mile. As your local points of contact on ethics and compliance, they serve as a bridge between our business and experts on the [Way2Play Team](#). Heroes are the allies in the room, our in-person guides, and the advocates of doing the right thing. They are appointed to the Way2Play Heroes program after a careful vetting process and receive extra training to help guide you if you have questions or concerns about what to do. Click [here](#) to find your local list of Heroes.

Unsure What to Do?

Check out the [Activision, Blizzard, and King Ethical Decision-Making Guide](#):



Always Speak Up: Ask Questions and Raise Concerns

We are committed to providing a workplace where individuals feel comfortable reporting concerns immediately - when concerns occur or upon learning of them; however, you should not be discouraged to report concerns that have occurred in the past; we still want to know about those. We understand that there are times when you feel that you can address an issue yourself or maybe you think the concern isn't serious enough to report. Sometimes you may be afraid to report, fearful of retaliation or fallout. We take retaliatory conduct seriously, we prohibit it, and we are committed to fostering a workplace where individuals can report their concerns without fear of retribution.

Speaking up and seeking answers is a key company value. So if you know or suspect something's wrong, including a violation of our Code or policies, we encourage you to speak up right away - even when others don't. Similarly, People Leaders who know or suspect something's wrong must promptly report such misconduct. But, of course, do so in good faith. Remember, making a "*good faith*" report does not mean your suspicions have to be correct. It just requires that you provide truthful and accurate information and believe that the conduct you are reporting occurred or is going to occur.

Retaliation: We Prohibit It

We prohibit retaliation against you or your co-workers for asking questions, making a good faith report, or taking part in investigations. If you come across, or hear about, anyone who retaliates against another worker (e.g., by discouraging, harassing, or threatening), please contact your manager or someone else on the [ASK List](#). If you feel you have faced retaliation for reporting a concern, you should contact anyone on the [ASK List](#). Anyone who does retaliate, or threatens to retaliate, can face consequences up to and including the termination of their employment (or assignment), as well as civil and criminal penalties. If you're a manager who has received a report - or who knows of or suspects retaliation - please escalate it right away to the [Way2Play Team](#). To learn more about our Anti-Retaliation commitment, read our [Workplace Integrity Policy](#).

How to Make Reports

You can make a report by using any of the resources on the [ASK List](#). We encourage you to do so quickly, and with as much detail as possible, in line with applicable laws. Our ability to investigate a concern is largely dependent on the quality and specificity of the information provided. We encourage you to provide as detailed information as possible when making a report. And please never start investigating something on your own.

Can I Make Reports Anonymously?

Our company strives to keep individual identities confidential to the extent possible. The [Integrity Line](#) allows you to report concerns anonymously. If you choose to remain anonymous, we encourage you to check back regularly to see if we have follow-up questions, which may impact the ability to efficiently and thoroughly conduct an investigation. Even if making a report feels scary, try to be honest about your concerns and reach out - that's the only way we can all do the right thing.

To learn more about what happens after making a report, check out the [Workplace Integrity Policy](#).

“Our strength comes from our incredible people doing incredible things for each other and for our players. That always includes acting with integrity and standing up for what is right.”

- Rob Kostich, President, Activision Publishing

What's the Right Way2Play?

Consider this scenario:

“I recently raised an issue to the Way2Play team because I was concerned my manager was violating part of our Code. Ever since then, I haven't been getting the same quality work assignments, even though my performance didn't change. Is this something I should raise, or should I just look for another job?”

The Right Way2Play:

“We prohibit retaliation of any kind. If you believe you are being unfairly treated, reach out to the [Way2Play Team](#) - or anyone on the [ASK List](#). To learn more, please read our [Workplace Integrity Policy](#).”



ACTIVISION

BILZARD
ENTERTAINMENT

King

3. Maintaining Trust

Just as we build our co-workers' trust by living up to high standards for how we treat each other, we earn trust by holding ourselves to, and meeting, extremely high standards in the areas explained in this chapter. Although some of the concepts below may sound unfamiliar, it is important that we understand what they really mean and uphold them every day.

Records

Be Accurate and Transparent

All of our company records and reports must be full, fair, accurate, timely and understandable. This includes financial and accounting records, business travel and entertainment expense records, work activity and time records and other records made on behalf of the company. We should never misstate facts, omit critical information, or modify records or reports in any way to mislead others, and never assist others in doing so.

If you believe information our company has provided is somehow incomplete, inaccurate, or otherwise misleading, please report it to the Law Department immediately.

Manage Them

Keeping accurate records is not just about creating documents—it is also about managing them. We must know and follow our internal controls and policies about records management, including maintaining, retaining, and correctly disposing of records. Doing this in the right way is key to protecting the integrity of our business. Record management is especially important when it comes to **legal holds**.

A legal hold might be put in place if the company is involved in or anticipates litigation. If you become subject to a legal hold, the Law Department will contact you with instructions on preserving certain records related to specific topics.

If you have questions about record management, please see the [Record Management Policy](#) or reach out to the Law Department for guidance.

Insider Trading: Don't Do It

It's never okay to buy or sell stock while you have "material, nonpublic information" about Microsoft, companies we do business with, or any publicly traded company. You may think that only senior management has access to this type of information, but that's not the case.

Some examples of things that might be **material, non-public information** are:

- Information about future earnings or losses
- Pending or proposed mergers or acquisitions
- Significant sales of assets
- Executive management changes
- Significant new discoveries, products, or developments
- Changes to trends in a business or game

People who are likely to have access to material non-public information can be subject to trading blackout periods during which they are prohibited from trading in Microsoft stock. Of course, you will be informed if this applies to you.

We keep this information confidential before it's released to the public – we never trade while in possession of this information, and we don't share it with anyone else, even close friends or family. Some of us are subject to trading blackout periods. Please see the [Confidential Information Policy](#) and [General Insider Trading Policy](#). If you have any questions, contact tradingq@microsoft.com.

Money Laundering: Watch for It

Money laundering is an attempt by another person or organization to conceal illicit funds or make those funds look legitimate.

→ **Money laundering** can take many shapes and forms. If you're working directly with distributors, vendors, or other business partners, raise a flag if someone:

- tries to make large payments in cash and that person is not mentioned in the contract
- wants to pay more than the contractual sum
- tries to make payments in other currencies than those specified in the contract
- makes payments from an unusual, nonbusiness account

If you have any questions, contact the Law Department.

Anti-Corruption: Business without Bribery

Bribery is never an option. We do not:

- offer, pay, or accept bribes or kickbacks in any form, whether it involves a public official or a private party, or
- tolerate corruption as part of our business dealings

Our relationships with public officials must be transparent and businesslike. There are laws that prohibit or limit the gifts, entertainment, and travel that a public official can accept. And offering any of these things to a public official, no matter how small, may be prohibited because it can create negative consequences for you and the company. You must obtain prior written approval before providing any gift or entertainment, including travel and hospitality, to a public official. Please see the [Gifts & Entertainment Policy](#) and [Anti-Bribery & Anti-Corruption Policy](#) for further details.

Doing Business Internationally: Follow the Rules

Being a global player means there are some extra rules and regulations that we need to follow. A few of these are:

- laws about the import and export of products and technical data
- laws that prohibit the delivery of products, data or information to certain nations, organizations, or individuals
- economic sanctions and trade embargoes
- laws that prohibit companies from getting involved in any international boycott that isn't approved by the applicable government

If you're unsure whether one of these laws apply to the work you do, if you wish to report an issue about one of the above laws, or you receive a request to be part of an international boycott, please immediately contact the Law Department.

“Our magic starts with our people. We create joyful experiences for millions, and we do it by showing up for one another with integrity, respect, and a shared commitment to doing what’s right, every step of the way.”
- Todd Green, President, King

What’s the Right Way2Play?

Consider this scenario:

“I had lunch with my brother-in-law last week, and he was really interested in the financial performance of our company. He wanted to change some investments in his portfolio, and was hoping to invest in our company, but only if he knew a few more things about our management team. I told him I’d think about it. If I pass along a little information that he can probably learn in the next two weeks anyway, would I be doing something wrong?”

The Right Way2Play:

“Yes. Passing along any confidential information is a big deal. Even something that seems small and doesn’t benefit you directly can be a violation of our [General Insider Trading Policy](#). Think before you act, since the consequences may include reputational damage, fines, and/or jail time.”



4. Protecting Our Fans, Customers, and Business

Every day, millions of people welcome our products into their lives. Whether it's games, esports, or other entertainment, what we do influences and enriches people's lives. And with great entertainment comes great responsibility.

Fair Sales and Marketing: Be Honest

We make every effort to make sure that what we advertise about our own products – or say about our competitors' – is clear and true.

Privacy Matters

Many people put their trust in our hands when they give us their personal information. And we honor this trust by making sure that we follow [our policies](#) and applicable laws for handling this information. If you're ever unsure about this, contact the Law Department.

Product Quality: Live Up to Our Standards

We take great pride in the quality of our entertainment products. We can only do this by following applicable laws and regulations.

We create great entertainment for millions of people. To continue creating products for our fans and customers – and ourselves – we need to keep doing business the right way. This section explains how to go about your day-to-day work, including how to deal with company assets, social media, gifts and entertainment in business contexts and conflicts of interest.

Confidential Information and Intellectual Property: Protect It

One of the most valuable assets at the company is our intellectual property and confidential information. And we all share the same responsibility to protect this information and keep it confidential. Please see the [Confidential Information Policy](#) for more information.

Find out more

If you have questions on the disclosure of confidential information or intellectual property, or you suspect an improper release of confidential information, please contact the Law Department or your information security team right away.

Confidential information can take many forms, including:



Information about
new products and
designs



Marketing
strategies



Trade Secrets



Programs and
computer code



Financial
information and
business plans



Personnel
information



Information
shared at All Staff
Meetings



Internal metrics

If disclosed, this kind of nonpublic information can be used by competitors or harm our company. Remember, not all confidential information is our information. We must protect confidential information disclosed to us by business partners and third parties, or we risk those relationships and may expose the company to legal liability.

Please try to prevent mistakes before they happen. As an example, you should always handle business-related paperwork, voicemails, texts, instant messages, and emails with care. Use caution when discussing or viewing work in public places such as restaurants, cafés, trains, and airplanes – or even when working remotely from home if you share common space with others. If you need to share such information as part of your job, always use company-approved tools to do so.

Remember, we all signed agreements relating to our company's proprietary information; our obligation to protect this information continues even after we've left the company. If you have any questions, you can always use the [ASK List](#). Please see the [Confidential Information Policy](#) for more information.

Physical assets and information systems: Use Them Wisely

Every day we use our company's physical assets and information systems. These can be electronic equipment, facilities, funds, email, the intranet, or other company property. Whatever they are, it's important we treat these assets responsibly, professionally, and in line with company policies. We must protect them from theft, misappropriation, and damage.

Remember that workers can't expect privacy when they use company information systems – our company may monitor the use of our IT systems, equipment and networks, and the activity and content of traffic on them – at any time, unless prevented by any applicable law. Also, you should not use unapproved messaging applications for your work or company business – this includes ephemeral apps (messaging apps in which the messages disappear). The laws may vary depending on where in the world you are working, so it's really important that you understand the [Acceptable Use of Information Technology Resources Policy](#) that's applicable to you, as it provides more detail about how and why we monitor. [We also have an FAQ](#) that can help you better understand the policy.

Social Media: Be Transparent and Think Twice

Do you want to write something about our company, our products, the gaming industry, or anything else related to us on your personal social media channels? Per our [Social Media Policy](#), make sure you:

- ☐ disclose your relationship with our company
- ☐ make it clear that you're expressing your own opinion
- ☐ consider whether your post could be taken out of context
- ☐ be careful not to share any [confidential information](#)
- ☐ and most importantly, use common sense!

If you post on social media on behalf of the company as part of your job, remember there are additional guidelines in the [Company Sponsored Social Media Policy](#) that you need to follow. For example, regardless of whether your posts on social media are on behalf of the company, remember that you are still expected to Respect Each Other and to Act with Integrity online, just like in your in-person interactions.

Personal Data: Protect It

Do you access personal information about fellow teammates as part of your job? It's important to protect this information from inappropriate or unauthorized use or disclosure and handle it according to our company policies and procedures as well as the privacy and data protection laws (whether local or international) that apply to your work.

Find out more

See your applicable [information security and data protection policies](#) for more information. If you see something that isn't right, please contact the Law Department or your information security team.

This does not prevent you from freely talking about things protected by law, for example, the right of employees in the United States to talk about wages, hours, or other terms and conditions of employment.

In the event of a crisis or sensitive situation, do not speculate or share unverified information. Direct any inquiries to the designated company spokesperson.

“I’m proud to be a Way2Play Hero to help foster an open and inclusive workplace culture for all of us. I may not have all the answers, but I’m here to listen and point people in the right direction if they ever have a concern.”

- Adrian Ledda
- Head of Inclusive Game Design; Way2Play Hero

What’s the Right Way2Play?

Consider this scenario:

“One of my colleagues posts a lot on social media, and they’ve recently been promoting one of our new games. I’ve started to see a lot of negative talk about one of our competitors in the threads, and they’re sharing statistics and data that I know are false. Is this an issue?”

The Right Way2Play:

“Yes. We should never misrepresent information about our competitors, so it’s important you notify someone on the [ASK List](#) about this issue. When we post about our industry, it’s also important to use #viewsaremyown and disclose your affiliation with the company according to the policy. To learn more about these guidelines, check out the [Social Media Policy](#) and the [Company-Sponsored Social Media Policy](#).”



Gifts and Entertainment: Build Relationships the Right Way

Are you in contact with business partners or people seeking to do business with us? It's important that you know how to deal with gifts and entertainment. Offering or accepting gifts or entertainment can cloud judgment and influence business decisions. Even if you think you aren't going to be influenced, the mere *appearance* of being improperly influenced is a serious risk. And remember that if you are providing a gift or entertainment to a public official, you must obtain prior written approval regardless of its value. So whether it's a laid-back dinner, tickets to a game or an expensive gift, always check the [Gifts & Entertainment](#) and [Anti-Bribery & Anti-Corruption Policies](#) to find out what's okay before you act. Remember to use the [ASK List](#) if you're in a tricky spot or aren't sure what to do.

Conflicts of Interest: Avoid Conflicts that May Hurt Our Business

A "conflict of interest" can arise any time our personal interests conflict with - or even simply just appear to conflict with - the interests of the company. We each have an obligation to refrain from engaging in any activity or having a personal interest that presents a "conflict of interest" and should seek to avoid even the appearance of a conflict of interest. We are all responsible for avoiding these situations. And the most important thing to remember if you come across a potential conflict is to disclose it. Often, a potential conflict can be worked out.

What's permitted and prohibited under this section will vary based on your working relationship with the company (i.e., employee, contingent worker, consultant). This is why it's important to reach out for guidance if you are unsure about a potential conflict of interest.

Before we get to examples of potential conflicts of interest we might face, here are some general questions you should ask yourself to help you understand whether a situation you are facing might create a conflict of interest.

- ☐ Could this activity or situation lead me to make a choice that benefits myself, my friends, or my family at the expense of the company?
- ☐ Could this activity or situation negatively impact my ability to do my job?
- ☐ Could this activity or situation potentially harm the company?
- ☐ Could this activity or situation embarrass the company or me if it showed up on the front page of a newspaper or blog?
- ☐ Is this activity potentially competitive with the company's business?
- ☐ Would it, or could it, appear that I am putting my best efforts towards my own projects, as opposed to the company's projects?

If the answer to any of these questions is "yes," the relationship or situation is likely to create a conflict of interest, and you should avoid it. Employees can find the appropriate ways to disclose potential conflicts and obtain guidance [here](#). Questions about whether a situation may present a potential conflict that needs to be disclosed can be submitted to the [Way2Play Team](#).

Check out some examples of potential conflicts of interest:

Working with family and friends

Are you thinking about hiring or referring a relative or someone you have a close personal relationship with for a job at the company? Or are you already working with them? Or perhaps someone close to you is working with or for a competitor, supplier or another business partner of our company? This could be a conflict of interest – please see the [Personal and Family Relationships at Work Policy](#).

Personal relationships with co-workers

We understand that personal relationships sometimes occur in the workplace. While we would prefer not to be involved in employees' personal lives, some relationships (including relationships between People Leaders and those that they supervise) could present a conflict of interest – please see the [Personal and Family Relationships at Work Policy](#).

Outside employment or other outside activities

No matter the purpose, whether it's paid or not, outside employment or an outside activity can create a conflict of interest if it has the potential to compete with our company, interfere with your job or damage our reputation.

Side projects or inventions

If you are considering creating, developing, or working on a video game project in your spare time, these must be disclosed via the appropriate Side Project Process before you begin any work. This includes open source, modification, and game engine projects as well as new games, including those you are working on as a hobby.

All employees should disclose these side projects through the [Way2Play Portal](#).

Potential conflicts of interest (continued):

Financial interests or investments in other businesses

Having a business interest in a current or potential competitor or business partner, such as providing a loan to, investing in or taking ownership in them, may cause a conflict of interest.

Board memberships/participation

Serving on the board of directors of an outside company, even if that company doesn't do business or compete with us, can still create a conflict of interest.

Corporate opportunities

A conflict of interest can arise if you're pursuing, or assisting a friend or family member in pursuing, a business or investment opportunity that you discovered while using company property or information.

In each of these situations, the rule is the same – if you are considering entering any of the scenarios mentioned above - or any other situation that may create a conflict of interest, or the appearance of a conflict of interest, you should [disclose the potential conflict](#) and obtain guidance. Finally, it's important to understand that as circumstances change, a situation that didn't present a conflict of interest before may present one now or later.

What's the Right Way2Play?

Consider this scenario:

“A buddy of mine reached out for help on a new game he’s thinking of developing. I don’t think it would interfere with the work I’m doing at my studio. In fact, I mentioned it to my boss, and they said it sounded cool. Do I still need to get official approval?”

The Right Way2Play:

“Yes. This is a great example of when you should refer to the Side Projects process. In this case, it sounds like you completed Step 1, but you still need to fill out the online form and wait for an official response before getting started. If your project is time sensitive, you can email Way2Play@activisionblizzard.com to ask for an expedited review.”

Remember, the Code of Conduct is not intended to prohibit or infringe on an employee's rights to discuss wages, hours, working conditions, or other terms and conditions of employment or to otherwise engage in protected concerted activity under Section 7 of the National Labor Relations Act.



5. Working with Our Business Partners and Communities

We are all part of a global community. And what we do as a company affects, and is affected by, the world around us. This chapter explains how we compete on fair terms, make a good impression, and interact with our external communities. Keep in mind that all employees are required to report known or suspected violations of our [Anti-Bribery and Anti-Corruption Policy](#) and [Competitive Intelligence Policy](#).

We Play Fair

Wherever we do business, we follow fair competition laws. Fair competition means we never make agreements with competitors about:

- pricing of products or services
- fixing wages or compensation
- terms or conditions of sale
- production volume
- discounts and promotions
- market allocation

Although the spirit of these laws seems straightforward, applying them to real life situations can be complex. Competing unfairly can result in severe civil and criminal penalties for both our company and anyone who played a role in breaking these laws. So, if you interact with competitors, it's critical you understand our policy and these laws. Any questions? Contact the Law Department at antitrusthelp@activision.com.

Trade Associations: Participate with Care

An association of people or companies in a particular business or trade, organized to promote their common interests.

Since there are so many fair competition laws and regulations across the globe, this area can be complex. That's why we must be extra careful when we take part in trade associations.

Third Parties: Demand Integrity

We work every day to conduct ourselves in a way that reflects the company's commitment to do business the right way. And we expect our business partners to do the same and follow our [Vendor Code of Conduct](#). When we select and work with other organizations or individuals, we take steps to get to know who they are, since they serve as a reflection on our company. How they act matters. To advance trust with our customers and the public, we must only work with ethical representatives who share our values.

Compete with Integrity

Knowing our competition is an important part of being successful. But we always get to know our marketplace and competitors on fair terms. That is, we follow the laws and never try to discover our competitors' confidential information or trade secrets in an unethical way.

Respect Human Rights

We strive to conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights. We do not tolerate abuse of human rights in our workplace or our supply chain. Each of us can help eliminate abuses such as child labor, slavery, human trafficking, and forced labor. You can start by reporting any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners.

Government Customers: We Have Them

When a government is our customer, we need to stay up-to-date with and follow the laws and regulations specific to government business, such as contractual obligations, procurement or accounting and billing practices. And keep in mind that laws and regulations may limit us from hiring employed or recently retired public officials. The Law Department must be engaged during any recruitment process involving a current or recent public official, their close relative, or their referral. Please refer to the [Anti-Bribery & Anti-Corruption Policy](#) for more information.

Communication Outside of the Company: Check with the Right People

If you're approached by the media to speak about a topic, please forward that inquiry or request to the Communications and/or Public Relations team. You should not speak to the media without the approval and supervision from the communications team. If you're at an event and someone outside our company asks for a comment, do not answer any questions or provide comments. Instead, please forward the request to the communications team or provide the PR@activisionblizzard.com email address to the media contact.

If you're invited to speak outside the company, be sure to read the full [Speaking Engagements Policy](#) and follow the steps outlined.

Environmental Sustainability: We Are Committed

We care about our planet and are committed to advancing sustainability. Accordingly, it's a given that we also follow the environmental laws, rules and regulations that apply to us. If you ever recognize a potential environmental issue, please contact our Law Department.

Audits and Investigations: Be Helpful and Transparent

Sometimes our company needs to conduct investigations, audits, or other inquiries. These can be performed by internal or external auditors, attorneys, or investigators. And it's our responsibility to help them when they need our support. We expect you to provide them with accurate and timely information, without manipulating or misleading their work in any way. The Law Department or [Way2Play Team](#) will guide us on when and how to aid in any investigation, audit, or inquiry.

Political Activities: Be Responsible

We are each free to engage in the political activities of our choice on our own time and with our own money. We never use company funds for political activities without getting approval from the Law Department or do anything to give the impression that personal donations and contributions represent the company. And of course, we don't take part in political activities that are against the laws in any of the places where we operate. So, unless you've been assigned by our company to represent us or assist with company political activities, you shouldn't get involved in these activities for the company. Any questions? Contact the Law Department. Please see the [Public Advocacy Policy](#) for more information.



“The Right Way2Play means showing up for each other, honoring our commitments, and engaging with each other through honesty, respect, and compassion in our words and actions.”
- Johanna Faries, President, Blizzard Entertainment

What’s the Right Way2Play?

Consider this scenario:

“Our team recently went out to celebrate a completed project, and some of our business partners - outside of our company - had way too much to drink. Is this something I need to escalate?”

The Right Way2Play:

“Yes. Our business partners, vendors, and service providers are held to high standards of conduct, just like us. Even if you’re celebrating outside of our offices, we don’t want to create a situation that risks the safety or integrity of our colleagues, business partners, or company. You should always reach out to anyone on the [ASK List](#) to share your concerns.”



Our Code of Conduct: The Right Way2Play

The Right Way2Play is about fostering an ethical, speak up culture.

It means doing the right thing, even when it's difficult.

The Right Way2Play is about taking responsibility.

It means a work environment that's safe, so everyone can bring their creativity.

And where we all act with integrity.

The Right Way2Play means speaking up for ourselves, for each other, and for our community of players.

I'm committed to fostering an ethical culture.

One that is open, respectful, and inclusive.

No matter where you work across the globe, or what group you support, we all live by our shared Code of Conduct.

And that's the Right Way2Play.



ACTIVISION

BLIZZARD
ENTERTAINMENT

King