

# VENDOR CODE OF CONDUCT



Activision Blizzard, Inc. and its subsidiaries, including Activision Publishing, Inc., Blizzard Entertainment, Inc., King Digital Entertainment Limited, Major League Gaming Corp. and Activision Blizzard Studios LLC (collectively, the "Company"), are committed to maintaining the highest level of integrity and honesty throughout all aspects of its business. The Company believes that it is the responsibility of its business associates, including its vendors and suppliers and their respective sub-contractors and suppliers, to treat others with honesty and respect and to otherwise act in accordance with the highest ethical standards. As such, the Company intends to transact business only with persons that operate in compliance with the requirements described in this Vendor Code of Conduct ("our Vendor Code of Conduct").

## Observance of Legal Requirements – Adherence to Ethical Standards

Every business associate must comply with all laws and regulations applicable to its business and the Company's business. Each business associate must also ensure all of its sub-contractors and suppliers comply with the standards in our Vendor Code of Conduct with respect to work performed for the ultimate benefit of the Company. In addition, each business associate is responsible for ensuring that its employees are aware of the laws and regulations related to their job activities so that they can perform their work in accordance with the letter and spirit of the law.

The standard of ethical conduct to which business associates must adhere, however, goes beyond mere compliance with legal requirements and also includes those standards of behavior to which people with a strong commitment to social responsibility adhere.

## 1 Child Labor

No one under the local legal age limit or the age of 15, whichever is greater, may be allowed to work in a facility that produces merchandise or performs any service for the Company. The Company encourages the creation of apprenticeship programs tied to formal education for young people as long as students will in no way be exploited or placed in situations that endanger their health or safety.

## 2 Forced Labor

Under no circumstances may business associates use forced or prison labor of any kind. Further, under no circumstances may business associates work with any person that uses forced or prison labor.

## 3 Disciplinary Practices

Business associates will not use corporal punishment or any form of physical or mental coercion. Business associates will not permit sexual harassment by, or of, their employees.

## 4 Discrimination: Respect for Individuals

Business associates must recognize the right of employees to choose (or to choose not) to affiliate with legally sanctioned organizations or associations without unlawful interference. Business associates must not discriminate on the basis of gender, race, color, national origin, ancestry, religion, creed, physical or mental disability, pregnancy, sexual orientation, gender identity, gender expression, marital status, medical condition, military or veteran status, age or any other basis protected by federal, state, or local law.

## 5 Working Conditions

Business associates must provide a safe and healthy working environment for their employees. Furthermore, if housing is provided to their employees, such housing must be clean and safe.



## 6 Wage and Hours

All business associates must set working hours, wages and overtime pay that are in compliance with all applicable laws. Workers must be paid at least the minimum legal wage applicable in their respective countries. While overtime is often necessary in consumer product production, business associates must operate in a manner that limits overtime to a level that ensures humane, safe and productive working conditions. Overtime, if necessary, must be paid in accordance with local laws.

## 7 Environmental Standards

Business associates must comply with all applicable laws and regulations relating to the environment and share the Company's commitment to the environment.

## 8 Responsible Sourcing of Minerals

Business associates that supply the Company with physical products are expected to take steps to determine whether the supplied products contain any conflict minerals (i.e., columbite-tantalite (coltan), cassiterite, gold or wolframite, or their derivatives tantalum, tin and tungsten). If so, the Company expects business associates to implement supply chain due diligence processes to identify the sources of these conflict minerals and to 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.

## 9 Customs

Business associates must adhere to all customs laws, including all import and export regulations. Business associates are prohibited from participating, in any manner, in the 'trans-shipment' of merchandise from one country to another country in order to illegally evade a country's customs laws.

## 10 No Bribery

Business associates may not engage in corrupt practices of any kind, including private or public bribery or kickbacks. Business associates will maintain integrity, transparency and accuracy in corporate record keeping.

## 11 No Unfair Business Practices; Privacy

Business associates will act lawfully and with integrity in the proper handling and protection of competitive data, proprietary information and other intellectual property (including but not limited to trade secrets, patents, trademarks, and copyrighted works) and comply with applicable legal requirements regarding fair competition, antitrust, and accurate and truthful marketing. Business associates shall safeguard and make only proper use of confidential information to ensure that Company, worker and customer privacy are protected.

## 12 Reporting Violations

In the event that a business associate becomes aware of any actual or potential violation of any provision in our Vendor Code of Conduct, including any unlawful or unethical situation, that business associate is expected to promptly report its concerns to the Company at [vendorcompliance@activisionblizzard.com](mailto:vendorcompliance@activisionblizzard.com). Every business associate is expected to provide reasonable assistance to any investigation by the Company under our Vendor Code of Conduct, and must protect its employees and contractors from any form of retaliation for reporting an actual or potential violation or for assisting in an investigation or proceeding regarding a suspected violation.

## 13 Compliance

The failure of a business associate to comply with one or more of the foregoing guidelines shall give the Company the right 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 the Company 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 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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