

WORKPLACE INTEGRITY POLICY



1 Purpose: What is Workplace Integrity?

At its core, Workplace Integrity means doing the right thing no matter the situation or consequence.

Why do we have this Policy?

At Activision Blizzard, we strive for trust, respect, and dignity in everything we do. We know that our people are the most important part of the organization and are committed to fostering a respectful workplace where integrity and responsibility are the driving values in our interactions with one another.

The purpose of this Policy is to ensure that we all play by the same rules, that we have a shared understanding of what it means to have a respectful workplace, and reinforce that Activision Blizzard is committed to addressing any misconduct that detracts from a respectful workplace. This Policy will cover types of misconduct that can and should be reported, how and when anyone can speak up and report this type of misconduct, and what can be expected once a report has been made. We will cover some other topics as well, such as the responsibilities and obligations of managers, more information on certain types of misconduct, and how members in our workplace are protected from retaliation when involved in reporting misconduct or participating in investigations.

We won't be able to cover every possible scenario here but there are ample resources where you can get answers to your questions surrounding our commitment to, and expectations for, maintaining a respectful workplace. That's where the ASK List comes in.

THE ASK LIST: WHERE YOU CAN GO FOR HELP

- Your manager
- Another manager you trust
- Any member of the [Way2Play Team](#) directly
- Any member of HR
- Any member of the Law Department
- The Integrity Line (1-877-WAY2PLAY (1-877-929-2752) within North America or way2play.ethicspoint.com from anywhere in the world)

You can always reach out to your Way2Play Hero for guidance about your reporting options.

2 Scope: Does this apply to me?

Yes, and more on that below.

Who? This Policy applies to every single person at every level and in every part of the organization. This Policy applies, whether you are a full or part time employee, contingent worker, consultant, a team member placed by a staffing firm, intern, or a board member. And, if you are subjected to or witness misconduct while at work by people outside of the Activision Blizzard teams, we want to know about that too, so we can help to be sure you are working in the respectful workplace you deserve.

Where? Everywhere! This Policy applies throughout your day-to-day work, whether in-person or virtual

(including over text, calls, emails or our virtual tools like Zoom, Slack, and the virtual gaming environment). This Policy also covers off-site activities that impact the workplace, and work-related social events.

This Policy has a very broad organizational and geographical reach. It supersedes any internal policies that may conflict with it. "Activision Blizzard" means all of the subsidiaries and business units within the Activision Blizzard universe, including Activision, Blizzard, King, and each of our studios. Because Activision Blizzard has 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 Policy applies. If there is a conflict with local laws, local laws apply.

For this policy to be effective in maintaining a respectful workplace, it is all of our responsibility to promptly speak up when you see something that you think is not right— including concerns about unethical behavior, violations of our [Code of Conduct](#) or other policies, or applicable law.

Some examples of concerns that should be reported include:

- Actual or threatened workplace violence
- Antitrust or trade control law violations
- Breach of confidentiality obligations or record management policies
- Bribery or corruption
- Bullying
- Discrimination or harassment, including sexual harassment
- Drug or alcohol abuse
- Failure to disclose conflict of interest in violation of Activision Blizzard policies
- Falsification or manipulation of data
- Fraud
- Insider trading or other violations of applicable securities laws
- Misuse of Activision Blizzard properties, including IT facilities
- Retaliation

Never hesitate to come forward with a report. This policy covers misconduct by coworkers, supervisors, managers, and third-parties. When in doubt, it is always better to report your concern, including concerns or reports you become aware of from someone outside of Activision Blizzard, like vendors and other third parties. While Activision Blizzard encourages you to raise concerns or reports to Activision Blizzard, this Policy is not meant to and does not restrict any individual from reporting information directly to the appropriate federal, state, or local regulators or administrative agencies, with or without prior notice to Activision Blizzard. More information on this topic is provided later in this Policy in Section 5.

3 Reporting Concerns:

Reporting a concern, how does it work?

There are several different ways you can report concerns to Activision Blizzard, and you should always use the one that makes you feel the most comfortable. For many of us, this will be our manager, but you can always reach out to any of the other resources on Activision Blizzard's "ASK List". Some things are worth repeating, so here it is again:

- Your manager
- Another manager you trust
- Any member of the [Way2Play Team](#) directly



- Any member of HR
- Any member of the Law Department
- The Integrity Line (1-877-WAY2PLAY (1-877-929-2752) within North America or way2play.ethicspoint.com from anywhere in the world)

You can always reach out to your Way2Play Hero 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 (unless a local law prohibits anonymous reports). 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: 1-877-WAY2PLAY (877-929-2752) in North America or the toll-free numbers in other parts of the world as listed on way2play.ethicspoint.com
- Internet: way2play.ethicspoint.com

Reports submitted through the Integrity Line are automatically directed to members of the 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. You can choose the reporting option that makes you the most comfortable; for example, if you have reservations about reporting your concerns directly to your manager (e.g., because of the sensitivity of the information to be reported, because of retaliation-related concerns, or where your report involves the conduct of your manager), you may report your concerns using any of the other options included in the ASK List.



We want you to 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 a while ago; 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. First, as we will say again, 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. It is a topic that has its own section in this Policy. Please be sure you read it and understand it. Second,

in such situations, we encourage you to refer back to the ASK List where you can find the people who will be able to talk you through the process, answer your questions, and help you gauge whether or not your concern warrants a deeper look.

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. Information such as the names of the individuals involved, the names of other individuals with information relevant to your concerns, direct quotes when language is relevant, and any documentation or evidence (e.g., notes, pictures, emails, screenshots,



etc.) will be very helpful in reviewing a concern.

4 Reporting Responsibilities of People Leaders:

I'm a People Leader, what are my obligations?

If you are in a People Leader role, which includes managers, supervisors, leads, employees of staffing agencies who supervise workers at Activision Blizzard, as well as members of the HR team, you play an important role in preserving and improving the integrity of our workplace and setting a respectful tone across the organization. People Leaders are responsible for modeling healthy professional relationships, utilizing respectful conflict management strategies, challenging inappropriate comments and actions, supporting all individuals involved in a report without judgment, and ensuring there is no retaliation against anyone involved in a report.

People Leaders are expected to understand policies, laws, and our Code of Conduct well enough to appropriately answer the questions of those who report to them. People Leaders are also expected to create a workplace that encourages members of the organization to come to them with questions or concerns.

To that end, **People Leaders, 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 policy, but also for ignoring or condoning behavior that may violate this Policy. If you have any questions or need clarification, the ASK List is for you, too!

As a People Leader, if you receive a report of a concern covered under this Policy, you must promptly escalate the report. 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 via any mechanism in the ASK List. Failure to carry out this duty is grounds for disciplinary action, up to and including immediate discharge.

Remember this three step process when you receive a concern or report:

Step 1	Step 2	Step 3
Show respect by listening carefully and without judgment. Thank the person for speaking up and show that you are committed to helping to solve the problem. Remember that they have done something very difficult.	Protect confidentiality by avoiding discussing the concerns with other colleagues who aren't part of the reporting and investigative framework.	If you have questions about a concern or are unsure as to whether to report, refer to another member on the ASK List.

5 Anti-Discrimination and Harassment

What is Activision Blizzard's Anti-Discrimination & Harassment Program?

Activision Blizzard's Anti-Discrimination & Harassment Program is detailed in this section, and we train on the topics annually to ensure that the rules are clear and understood. Throughout this section, we will expand on the topics of Discrimination, Harassment (with a specific section on Sexual Harassment), and Bullying. We want to take an opportunity to provide some definitions, examples, and further guidance around these very important topics.

Activision Blizzard prohibits discrimination, which includes certain forms of harassment, based on certain protected categories, and as prohibited by law. You are probably familiar with "protected categories" or "protected characteristics;" and while state laws in the U.S. are not uniform, we consider the following to be "protected characteristics" under our 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, 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;
- Any other status protected by applicable federal, state, or local law.

Discrimination

Discrimination occurs when a person receives less favorable treatment that negatively affects their employment due to that person's protected characteristic. Discrimination isn't always blatant or overt; subtle forms of discrimination can occur and can erode collaboration and teamwork when not addressed.

Harassment

Harassment under the law includes unwanted conduct related to a protected characteristic which has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive environment for an individual. The following are some examples of harassment we prohibit under this Policy:

- 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; and

- Physical conduct such as assault, unwanted touching, blocking normal movement, or derogatory gestures.

Note that the types of conduct prohibited by this Policy are generally broader than those prohibited by law. Certain behavior may be deemed a violation of this Policy even if that behavior does not meet the legal standards to be considered unlawful under applicable law. You are always expected to use your best judgment as teasing, offhand comments, or an isolated incident can still be harmful and a violation of this Policy. And bear in mind, harassment can still occur even if the target of the behavior does not find the conduct offensive, someone else may.

Being under the influence of alcohol or drugs is not an excuse for any violation of this Policy. We have clear guidelines and expectations around the consumption of alcohol at work-related events under the Drug & Alcohol Policy. Nonetheless, we do not want the Drug & Alcohol Policy to discourage individuals from reporting misconduct.

Sexual Harassment

Sexual harassment is based on someone's gender and is generally recognized as taking two forms:

- **Quid Pro Quo:** Unwanted sexual 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 decisions affecting the individual.
- **Hostile Work Environment:** Conduct that has the purpose or effect of unreasonably interfering with the employee's work performance or creating an intimidating, hostile, or offensive working environment and is based on a protected characteristic.

Examples of sexual harassment that this Policy prohibits include, but are not limited to, the following:

- Visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, posters, websites, or emails;
- Sexual innuendos, lewd jokes, comments about an employee's body or clothing that are perceived to be sexual in nature, or sharing stories about sexual experiences;
- Verbal sexual advances, propositions, or repeatedly asking for dates despite being rebuffed;
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, or suggestive or obscene letters, notes or invitations;
- Physical conduct such as assault, unwanted or suggestive touching, kissing, rubbing, or caressing of a person's body and/or clothing, impeding or blocking movements, violating personal space, or brushing up against a person (whether accidentally or on purpose);
- Harassment on the basis of gender or gender stereotypes; and
- Job-related threats or rewards to solicit sexual favors.

Remember that sexual harassment doesn't have to be sexual or motivated by sexual desire. Gender discrimination also includes discrimination based on sexual orientation, or because someone isn't conforming to stereotypical or outdated, notions of femininity or masculinity or gender identity. All genders can be impacted by sexual harassment and, moreover the gender of the parties involved are irrelevant when applying this policy. And, again, certain behavior may be deemed a violation of this Policy even if that behavior does not meet the legal standards to be considered unlawful under applicable law.

At Activision Blizzard, we respect the multiplicities of gender expression and identities that are represented in our community. “Mistreating anyone based on their gender identity, expression, and presentation is considered a serious offense at Activision Blizzard.”

Bullying

Bullying is prohibited under this Policy and is contrary to our efforts to foster a respectful workplace. Unlike harassment, bullying does not need to be related to a protected category. The following are some examples of bullying that should be reported:

- Repeated degrading, derogatory, or insulting remarks;
- Verbal abuse or profane or obscene language directed at an individual;
- Intimidating or humiliating behavior in the form of verbal or physical conduct; and
- Intentional targeted isolation.

This provision is not intended to restrict or otherwise limit any employee’s right to engage in protected, concerted activity under the National Labor Relations Act. Specifically, nothing in this provision diminishes the rights of employees under the National Labor Relations Act, to discuss or advocate for current or changed terms and conditions of employment, whether or not the employees involved support or oppose the point of view of Activision Blizzard or Activision Blizzard managers.

Additional Enforcement Information

In addition to Activision Blizzard’s internal reporting procedures, employees should also be aware that the federal Equal Employment Opportunity Commission (EEOC) and state agencies investigate and prosecute complaints of unlawful discrimination, harassment, or retaliation in employment in the United States. You can contact the EEOC at eeoc.gov; complaint line 800-669-4000. For states, we have further information in the Local Notices Addendum of this Policy. Your Human Resources Business Partner also can provide you with the contact information for your state-specific civil rights agency. Additionally, nothing in Activision Blizzard’s internal reporting procedures, or policies, prevents or in any way restricts any employee from reporting information directly to federal, state, or local regulators, including those listed in the Addendum, without prior notice to or approval by Activision Blizzard. Nothing in Activision Blizzard’s internal reporting procedures, or these policies, limits an employee’s right to receive an award for information provided to such regulators.

Employees who believe they have been discriminated against, unlawfully harassed, or retaliated against for engaging in protected conduct may file a complaint with the appropriate local, state, federal agency, or any other governmental authority around the globe. Activision Blizzard does not prohibit or restrict you from exercising protected rights or otherwise disclosing information to law enforcement agencies, regulatory, or administrative agencies as permitted by law. Note that filing of an internal complaint does not relieve an individual of meeting any deadline for filing a charge of discrimination with an external agency.

6 Bystander Intervention

When should I get involved?

Activision Blizzard encourages bystander intervention in the Workplace. Even if you are not directly on the receiving end of misconduct, you may still have an opportunity to take meaningful steps to intervene or offer support to those who are affected. It isn’t about putting yourself in harm’s way to intervene in a dangerous situation but, instead, it’s saying something or doing something when you observe concerning conduct. Below are two examples of bystander intervention:

“I saw what happened between you and Jordan. It looked like it bothered you and I don’t think what happened was okay. If you want to talk to Human Resources or Employee Relations, I’d be happy to go with you”

Support and Reinforce

You have sent the message that you are supportive and that you do not condone the conduct. You’ve also let the person know that there is a witness to the conduct.

“Hey, Taylor, that attempt at a joke you made earlier in the conference room; I don’t think it landed like you wanted it to. Several people appeared offended, and I agree, it was inappropriate.”

Share your Truth

You have offered peer feedback, coaching and, perhaps, helped Taylor see a gap in their own conduct.

While we encourage bystander intervention, there is not a requirement to intervene. Sometimes it doesn’t feel right or safe. In particular, individuals who have experienced harassment, discrimination, retaliation or other misconduct are not required to confront those engaged in the behavior.

7 Response

A report was made, now what?

All reports will be reviewed in a fair and timely manner. In many cases, investigations are necessary. Investigative strategies vary depending on the type of misconduct, but the basic framework is generally described below. Also, regardless of the type of misconduct, all investigations are grounded in the concepts of neutrality and equity, focusing on facts, providing a fair process, and ensuring a safe and respectful workplace.

Investigative Process

Once a report is received, an initial assessment will be conducted, which may include an intake interview, to determine whether an investigation will commence, and who will conduct the investigation.

- In some cases, the initial assessment will determine that a further investigation is not necessary. In cases where the reporting party is a current employee and not anonymous, they will be notified of the decision and the reason that a further investigation will not be required.

The Ethics & Compliance team will assign investigators based on the nature of the concern and other factors. Certain investigations may be conducted by Human Resource Business Partners (“HRBPs”), the Employee Relations (“ER”) team, the Information Security team, or local Legal teams, in addition to the Ethics & Compliance workplace investigations team. Outside counsel might also be engaged to conduct the investigation. Investigators are required to be mindful of actual or perceived bias or conflict of interest.

- It is imperative that investigators be mindful as to the impact that investigations can have on the employee experience. To that end, investigators, particularly those handling employee-v.-employee misconduct, are trained and experienced in practicing empathy, utilizing trauma informed methods, and applying inclusive approaches.

All reports and investigations are treated confidentially to the extent possible, and information is disclosed on a need-to-know basis. However, absolute confidentiality cannot be guaranteed. It is possible that disclosure of some information learned from a report or during the course of an investigation, or even the reporter’s identity, may be necessary for Activision Blizzard to fulfill its obligation to investigate and resolve reports in a manner that is fair to all parties involved.

Collection of certain documents, information or evidence may take place during the investigative process, and the collection will depend heavily on the type of concern being investigated.

Interviews are an important part of the investigative process. There are generally three types of participants, or parties, which may be interviewed in an investigation: the Reporter, the Respondent, and other Witnesses. The person making the allegation is referred to as the Reporter. The person against whom the allegations have been made is referred to as the Respondent. Most other participants in an investigation are referred to as Witnesses. When identifying relevant Witnesses, investigators will include people who have direct knowledge of the matter at hand. It may not be necessary to interview all Witnesses that might have relevant information if the investigator has already obtained enough information to make a finding.

- Investigators strive to demonstrate care and support during the investigative process, including sharing information about the process, setting expectations as to timelines, and treating interviewees respectfully. Regardless of the type of investigation, investigators will seek to facilitate a safe and respectful workplace that prioritizes safety and well-being.
- Investigators will also keep in mind potential conduct by managers that a) might make it difficult on parties to participate in an investigation, or b) conduct that may constitute retaliation. To that end, Investigators will provide detailed information about the protection afforded to participants in an investigation and the prohibition of retaliation. You can expect investigators to take appropriate action to address such conduct, including opening a separate investigation to address potential retaliation should it occur.
- At no point during the investigation will any confrontation be required between a Reporter and Respondent, except in rare cases where required by applicable law.

All parties involved in an investigation have an important role in Activision Blizzard's truth-seeking and fact-finding process. Good faith cooperation of individuals in investigations is crucial to enacting justice at our organization. We all bear responsibility for fostering a respectful workplace and acting with integrity.

- We understand that participating in investigations can lead to high levels of stress, fear, and anxiety. Additionally, individuals might have questions about the process or have concerns about confidentiality and/or retaliation. During any part of an investigation, the Employee Relations and Ethics & Compliance team will be a resource to help individuals navigate the process, support employees' well-being, and evaluate available support options.
- Participants are responsible for adhering to honesty and candor during the investigative process.
- Witnesses are responsible for respecting the confidentiality of others' workplace experiences.
- Participants must not take any action that would prevent an investigator from gathering accurate evidence in the investigation. Participants are also responsible for not making any statements, taking any action, or engaging in any behavior that would be perceived as negative or retaliatory towards the person they know, or suspect, is the reporting party.

During the investigation, and in certain circumstances, it may be appropriate to provide accommodations or provide interim measures while the investigation is ongoing. Such measures may be taken to prevent a repeat of the concern being investigated, to reduce or eliminate the potential for retaliation, or to create a workplace where parties to an investigation feel safe and secure while participating in the investigative process. There are a lot of tools in the toolkit, but some examples include, and may vary depending on local laws:

- Work hours or assignment change;
- No-contact instruction;
- Temporary leave or suspension;
- Safety escorts to the parking lot; or
- Referral to Employee Relations for review of available employee resources such as EAP.

When fact-finding is complete, investigators will make a finding and, often, prepare a report. There are several possible outcomes:

- “Substantiated” is when the investigator, after a thorough investigation, identifies sufficient evidence (e.g., interviews, records, or other forms of evidence) that demonstrates that the allegation is more likely to have occurred than not.
- “Unable to Substantiate” or “Unsubstantiated” is when the investigator, after a thorough investigation, could not identify sufficient evidence that demonstrates that the allegation is more likely to have occurred than not. “Unable to Substantiate” should not be interpreted automatically to mean that the allegation was found to be false or that it was made in bad faith.
- There are other outcome possibilities in some circumstances and those could include “Inconclusive Findings” or “Partially Unsubstantiated.” Neither of these designations should be interpreted automatically to mean that the allegation was found to be false or that it was made in bad faith.

8 Resolution

What happens after the investigation?

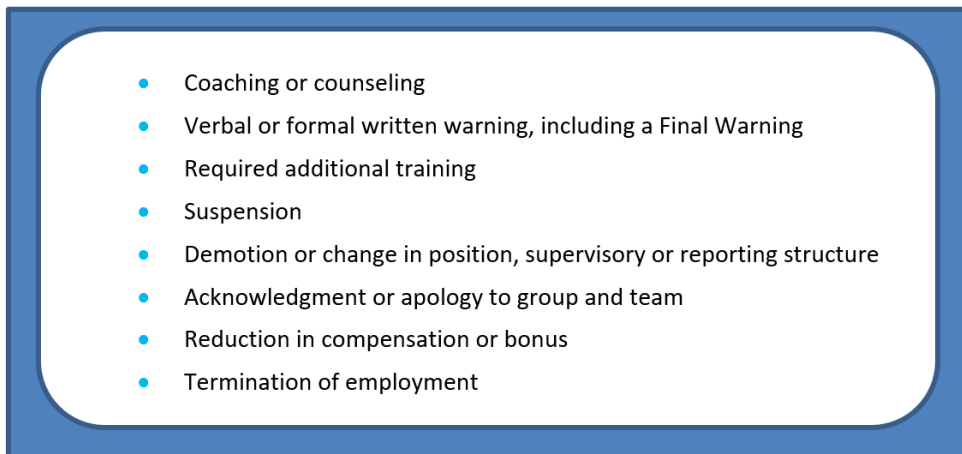
Unless doing so is prohibited by law or there are other justifiable reasons, upon completion of an investigation we will generally do two things: 1) Provide information to the Reporter and the Respondent regarding the outcome of the investigation in a timely manner and 2) Follow up with the Reporter to confirm that they did not experience retaliation as a result of having reported their concerns. For a number of reasons, including to protect the confidentiality of participants, we usually do not disclose specific evidence that supports the outcome of an investigation, or the corrective or specific disciplinary action taken as a result of the investigation.

At the end of the investigation, if appropriate, we will take disciplinary action and/or institute corrective measures. Disciplinary action outcomes and corrective measures are usually determined as follows:

- Ethics & Compliance, Legal and HR/ER will work with the business/function leader to identify appropriate disciplinary action outcomes and corrective measures. Business leaders are expected to make recommendations that will hold their teams accountable for a culture of respect and inclusion.
- In the event there is a disagreement among the reviewers about the appropriate disciplinary action outcome, the matter can be escalated to a Special Case Review Panel, which will generally include one or more senior leaders who are not directly involved in the matter. In some cases where the subject matter calls for it or there is a conflict for a member of the review panel, additional Senior Leaders may be added to the review panel. The individual Investigator that handled the investigation may advise the case review panel to help them understand the relevant context. The case review panel will come back to the Employee Relations and Ethics & Compliance team with their assessment of the case and outcome, and relying on that assessment, Employee Relations and Ethics & Compliance teams will make and implement the final decision.

- No person who is implicated in any way in an investigation will have any involvement in the decision-making process.

Disciplinary action outcomes, which may depend on local law, could include:



In addition to potential corrective action being issued for a Respondent in an investigation, the ER or Ethics & Compliance team may identify additional actions, including those arising from an inquiry into whether the report was handled properly.

9 Anti-Retaliation Policy

How am I protected if I report a concern or participate in an investigation?

We are committed to providing a workplace where individuals feel comfortable reporting concerns and participating in investigations without fear of retaliation. If there is **any** concern of potential retaliation, please reach out to any of the resources on the ASK List immediately.

We have a zero-tolerance approach regarding any threatened or actual retaliatory conduct against anyone for:

- Reporting a concern or potential misconduct in good faith internally or externally; or
- Assisting in good faith in an internal or external investigation or proceeding regarding a violation of applicable laws, rules, or regulations, or Activision Blizzard policies.
- Opposing any potential misconduct in good faith (e.g., refusing to follow orders that would result in discrimination, or resisting sexual advances);

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 have a reasonable basis to believe that the conduct you are reporting occurred or is going to occur.

Retaliation can come in many forms; some may be more obvious than others. However, any adverse action that would otherwise deter a reasonable person from reporting a concern, providing information in an investigation, or opposing any potential misconduct is retaliation, including the implementation, or permitting any of the following actions:

- Threats or intimidation
- Creation of a hostile work

environment

- Termination or suspension
- Demotion, reduction in pay or hours, or denial of a promotion
- Refusal to hire (e.g., for staffing agency employee)
- A performance evaluation that is

lower than it should be

- Unwarranted discipline
- Interfering with attempts to make a good faith report or participate in an investigation
- Other adverse consequences to the terms or conditions of employment

If you ever suspect that someone is retaliating against you or anyone else for speaking up in good faith, you should immediately report your concern using the ASK List.

10 Right to Modify:

Will this Policy change?

Activision Blizzard always has the right to supplement or modify this Policy at any time.

11 Policy Violations:

What happens if this Policy is not followed?

Violations of this Policy by any individual may result in disciplinary action by Activision Blizzard, up to and including termination of employment, subject to applicable law, as well as any applicable disciplinary policy or practice of the location where you work. Remember, anyone who suspects this Policy has been violated can report those concerns using the ASK List.

12 Administration of this Policy

Administration of this Policy must conform to all applicable laws governing protection of individuals from illegal workplace misconduct and retaliation. In the event that any law is in conflict with this Policy, the applicable law will prevail unless this Policy provides greater protection and its application does not result in a violation of law. While this Policy applies nation-wide in the U.S. and globally, see the following pages for a Local Notices Addendum that may expand this Policy in your location. Also, nothing in this Policy restricts employees 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. (Your Rights under back-end provisions or additional enforcement provision).

13 Getting in Touch:

What if I have questions?

Please direct any questions you may have on this Policy to our Ethics & Compliance team or the Activision Blizzard Law Department.

Our shared duty to this Policy ensures that we all have a respectful and safe place to work. Thank you for your commitment to the Right Way2Play for every player.

Addendum: Local Notices

U.S. Federal Agencies

Equal Employment Opportunity Commission

The Equal Employment Opportunity Commission (EEOC) will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party. Information may be located by visiting the agency website at www.eeoc.gov.

Securities and Exchanges Commission

The Securities and Exchanges Commission (SEC) is the federal agency that enforces federal securities laws. The SEC accepts tips, complaints, and referrals from members of the public online. Information may be located by visiting the agency website at www.SEC.gov.

National Labor Relations Board

The National Labor Relations Board (NLRB) is the federal agency charged with enforcing the National Labor Relations Act. The NLRB accepts and investigates charges of unfair labor practices online. Information may be located by visiting the agency website at www.nlr.gov.

California

The federal Equal Employment Opportunity Commission (EEOC) and the California Department of Fair Employment and Housing (DFEH) will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party. Information may be located by visiting the agency website at www.eeoc.gov or www.dfeh.ca.gov. The DFEH Sexual Harassment Prevention training may be accessed here: <https://www.dfeh.ca.gov/shpt/>.

Connecticut

Any employee who believes they have been harassed or discriminated against may file a complaint with the Connecticut Commission on Human Rights and Opportunities (CHRO). The CHRO may be reached at 450 Columbus Blvd Suite 2, Hartford CT 06103; telephone number (860) 541-3400; TDD NUMBER (860) 541-3459; Connecticut Toll Free 1(800) 477-5737; or online at www.ct.gov/CHRO.

Connecticut law requires that a complaint be filed with the CHRO within 180 days of the date when the alleged harassment occurred, if it occurred prior to October 1, 2019, and within 300 days of the alleged harassment, if it occurred on or after October 1, 2019. Remedies for sexual harassment can include:

- Cease and desist orders;
- Back pay;
- Compensatory damages;
- Emotional distress damages;
- Attorney's fees; and
- Hiring, promotion or reinstatement.

Employees can find additional information about the illegality of sexual harassment and the remedies available to victims of sexual harassment at the CHRO's informational website: <https://www.ct.gov/chro/cwp/view.asp?a=5019&Q=609536&chroNav=|>

Maine

Employees who believe they have been harassed or discriminated against may also file a formal complaint with The Maine Human Rights Commission (MHRC). The MHRC may be reached at 51 State House Station, Augusta, ME 04333-0051 or by telephone at (207) 624-6290 or fax at (207) 624-8729.

Massachusetts

Employees who believe they have been harassed or discriminated against may also file a formal complaint with either or both of the government agencies listed below:

The Massachusetts Commission Against Discrimination (MCAD) is the state agency responsible for handling complaints of harassment, including sexual harassment. The MCAD can be reached at the following locations:

Boston Office: One Ashburton Place, Sixth Floor, Room 601, Boston, MA 02108, telephone number (617) 994-6000

Springfield Office: 436 Dwight Street, Second Floor, Suite 220, Springfield, MA 01103, telephone number (413) 739-2145

Worcester Office: 484 Main Street, Room 320, Worcester, MA 01608, telephone number (508) 453-9630

The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment claims, including claims of sexual harassment. The EEOC can be reached at: John F. Kennedy Federal Building, Government Center, 475 Government Center, Boston, MA 02203, telephone number (800) 669-4000.

Complaints filed with the MCAD and the EEOC must be filed within 300 days of the incident giving rise to the claim.

New York

Sexual harassment is not only a violation of this Policy, it is illegal under the New York State Human Rights Law, Title VII of the federal Civil Rights Act of 1964, and some local laws, including the New York City Human Rights Law. This Policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with the Company (collectively referred to as “Employees” or “Third Parties” throughout this Policy). Sexual harassment can occur between any individuals, regardless of sex or gender. Sexual harassment can be perpetrated by coworkers, subordinates, superiors, or anyone in the workplace (including contract workers, vendors, clients, customers, or visitors). All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such suspected sexual harassment to the ASK List. To make a complaint of sexual harassment, you may use Complaint Form available [here](#).

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court. Complaints with DHR may be filed any time within one year (three years beginning Aug. 12, 2020) of the harassment. If an individual did not file at DHR, they can sue directly

in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court. Complaining internally to the Company does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment. You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR. DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines. DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov. Contact DHR at (888) 392-3644 or visit www.dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

The United States Equal Employment Opportunity Commission (EEOC) enforces federal antidiscrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court. The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC. An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669- 4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov. If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 22 Reade Street, 1st Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

Oregon

Nothing in this policy precludes any person from filing a formal grievance in accordance with the Oregon Bureau of Labor and Industries' Civil Rights Division or the Equal Employment Opportunity Commission. Note that Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence no later than five years after the occurrence of the violation. Other applicable laws may have a shorter time limitation on filing.

Rhode Island

Employees who believe they have been harassed or discriminated against may also file a formal complaint with either or both of the government agencies listed below:

The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment complaints, including claims of sexual harassment. The EEOC can be reached at: John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203, Tel: 800-669-4000, Fax: 617-565-3196, TTY: 800-669-6820

The Rhode Island Commission for Human Rights (RICHR) is the state agency responsible for handling complaints of harassment, including sexual harassment. The RICHR can be reached at: 180 Westminster Street, 3rd Floor, Providence, RI 02903, Tel: 401-222-2661, Fax: 401-222-2616, TTY: 401-222-2664

Vermont

In addition to the complaint procedures set forth in Respectful Workplace Policy, any employee who believes they have been harassed or discriminated against may also file a formal complaint with either or both of the government agencies listed below.

- The state agency responsible for complaints of harassment is the State of Vermont Attorney General's Office – Public Protection Division Civil Rights Unit, which can be reached at 109 State Street, Montpelier, VT 05609-1001, (888) 745-9195 (toll free VT), (802) 828-3657, (802) 828-3665 (TTY), (802) 828-2154 (Fax), Website: <http://www.state.vt.us/atg/>.
- The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment claims, including claims of sexual harassment. The EEOC can be reached at: John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203, telephone number (800) 669-4000.

Employees who believe they have been unlawfully harassed may file a complaint with the Attorney General's Office or the EEOC. These agencies serve as neutral fact-finders and attempt to help the parties voluntarily resolve disputes.

Taiwan

Any report of sexual harassment will be handled in accordance with the procedures prescribed in the Gender Equality in Employment Act. In addition, an employee who reports a concern regarding or a violation of the Workplace Integrity Policy may be required to provide specific details regarding the report in accordance with requirements of applicable laws. Results of any investigation are only appealable in accordance with applicable laws.

In accordance with the Occupational Safety and Health Act, we prohibit, and do not tolerate, bullying, violence, or violation against our employees, whether it is from management, staff, customers, or any family members of any of the above. Any report of workplace bullying will result in mandatory investigation in accordance with the Occupational Safety and Health Act.

A violation of the Workplace Integrity Policy will result in termination of employment only if such violation is a terminable offence under applicable laws.

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