

REPORTING & NON-RETALIATION POLICY



1 Purpose:

Why do we have this Policy?

At Activision Blizzard, Inc., we are committed to doing the right thing. We rely on each and every one of our directors, employees, and contractors to conduct our business with integrity, honesty, and respect, and follow all applicable laws. This means promptly speaking up when you see something that you think is not right—including unethical behavior or violations of our Code of Conduct, policies or the law.

This Policy outlines how and when you should speak up and report conduct you believe violates a law, regulation or Company policy. It also outlines the rights and protections for those who come forward to report such concerns in good faith. We do not tolerate any form of retaliation against employees for making good faith reports, or any interference with their attempt or right to report. We take seriously, and investigate, complaints of retaliation against employees for making these reports.

2 Scope:

Does this apply to me?

This Policy applies to all directors and employees of the Company, no matter how senior or junior you are.*

Remember, when we refer to the "Company", that covers all parts of Activision Blizzard, including Activision, Blizzard, King, MLG, Activision Blizzard Studios or any individual studio you work for.



3 Reportable Conduct:

What should I report?

Report conduct that you know, or suspect, is a violation of (1) the law, government rules, and regulations; (2) our internal accounting controls or accounting and auditing practices and policies; or (3) our Code of Conduct or other policies.

For example, reportable conduct could include:

- Fraud, against our shareholders or otherwise;
- Inaccurate record keeping, falsification of data, or misappropriation of user data;
- Insider trading, or other violations of Securities & Exchange Act rules and regulations;
- Unethical behavior;
- Criminal activity;
- Environmental law violations;
- Corruption or bribery;
- Harassment or discrimination;
- Safety or security issues; or
- Conflicts with Company interest.

Never hesitate to come forward with a good faith report. When in doubt, it is always better to report your concern, as well as concerns or reports that you receive from people outside the Company, like vendors and other third parties.

Remember, our ability to investigate concerns or reports of retaliation is largely dependent on the quality and specificity of the information you provide, so please provide as much detail as possible.

*For employees residing in France, please refer to the France-specific policy on this topic.

4 Reporting Concerns: How do I report my concerns?

There are a number of different ways you can report your concerns or any retaliatory conduct, and you should always use the one you feel the most comfortable with. For many of us, this will be our manager, but you can always reach out to any of the other resources on the Company's "ASK list":

- Another manager you trust;
- Your human resource partner;
- Any member of the Legal Department; or
- The Integrity Line.

The Integrity Line is a confidential website and telephone line, operated by an external third party vendor, that 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 for further information as we investigate your concern, and may expedite the time it takes us to respond.

You can reach the Integrity Line by:

- **Telephone:** 1-877-WAY2PLAY (877-929-2752) in North America;

or to reach the service toll-free in the EU and APAC, by dialing the AT&T Direct Access Code for the country you're calling from (available at <https://www.business.att.com/bt/access.jsp>) and then 877-WAY2PLAY (877-929-2752)

- **Internet:** way2play.ethicspoint.com

Reports submitted through the Integrity Line are automatically directed to our Chief Compliance Officer and appropriate members of the compliance team and may be escalated as appropriate.

If you are a manager or supervisor and you receive a report of an incident of discrimination, harassment, or retaliation, you must escalate the report immediately to one of the resources on the ASK list.

5 Response: What happens when I make a report?

Once a report is received:

- Our Chief Compliance Officer, his or her designee, or another appropriate person will be responsible for reviewing, or overseeing the review or investigation of, any reported concerns;
- All reported concerns will be appropriately addressed;
- We will attempt to keep information and individual identities confidential to the greatest extent possible and always in compliance with applicable laws and regulations on employee privacy;
- We may provide feedback to the employees on reported concerns, where appropriate;
- All employees are expected to fully cooperate with any investigation;
- At the end of the investigation, we will take whatever corrective and disciplinary actions we deem appropriate and necessary;
- Anyone who has retaliated against an employee for speaking up in good faith, may face discipline, up to and including termination, as well as potential civil and criminal liability under local laws;
- Any actual or suspected breaches of law may be reported to the relevant law enforcement agencies, where appropriate; and
- In the event of an emergency, report first to the appropriate authorities, ensure your safety and follow up with an internal report as soon as practicable.

It is very important that you **do not conduct your own investigation**. Just identify and secure any potentially pertinent information or documents you may already have in your possession. If the reported behavior or retaliatory conduct continues after making a report, please report it directly to someone on the ASK list.

6 Non-Retaliation: Will I get in trouble?

We prohibit, and will immediately respond to, any retaliatory conduct against you for:

- Reporting a concern or potential misconduct in good faith; or
- Assisting in good faith in an investigation or proceeding regarding a violation of applicable laws, rules, or regulations, or Company policies.

Remember, that making a "good faith" report doesn't 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 reportable behavior occurred, or is going to occur.

Prohibited retaliatory conduct can take many different forms, including:

- Threats or intimidation;
- Creation of a hostile work environment;
- Discrimination or harassment;
- Termination or suspension;
- Demotion, reduction in pay or hours, or denial of a promotion;
- Refusal to hire;
- Blacklisting;
- Unwarranted discipline;
- Assignment of undesirable job duties;
- Any other adverse consequences to the terms or conditions of your employment; or
- Interfering with your attempts to make a good faith report or participate in the investigation.

If you ever suspect that someone is retaliating against you, or against any other employee or contractor, for speaking up in good faith, you should immediately report your concern using any of the methods described in this Policy.

7 Administration of this Policy

Administration of this Policy must conform to all applicable laws governing protection of employees from retaliation. In the event that any law is in conflict with this Policy, the applicable law will prevail. Any exceptions to the requirements of this Policy must be approved by the Chief Legal Officer or Chief Compliance Officer of Activision Blizzard; provided that no exception can permit a violation of law.



8 Right to Modify: Will this Policy change?

Remember, the Company always has the right to supplement or modify this Policy at any time.

9 Getting in Touch: What if I have questions?

Please direct any questions you may have on this Policy to our Chief Compliance Officer or Legal Department.

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