



## Electronic Arts Global Code of Conduct

Electronic Arts has long had an established set of values that reflect a clear vision for the Company and how we do business. These values – which we call “EA Actions” – provide a roadmap for our growth, govern our relationships with each other, with our partners and our customers, and should be used by our employees to guide their day-to-day decision-making.

### ***The EA Actions:***

#### ***Be Bold***

Go big | Take the right risks | Back our bets | Lead

#### ***Think Players First***

Listen and respond | Deliver beyond their expectations | Build lifetime players

#### ***Create Quality and Innovation***

Deliver products and services that surpass expectations | Be relentless about improving quality | Take creative risks

#### ***Act with Integrity***

Do the right thing | Trust others and support their decisions | Be transparent

#### ***Be Accountable***

Deliver on commitments | Always do what we say | Play our positions | Deliver and reward results

#### ***Learn and Grow***

Work hard, play hard | Develop yourself and others | Measure your improvement | Share knowledge generously

The EA Actions form the foundation of our Global Code of Conduct, which we expect each of our employees (including executive officers) and directors to read, understand and abide by. These values are reflected in a number of important Company policies, including those described below.

***Equal Employment Opportunity.*** Our values embrace the notion of diversity and equal employment opportunity. Because Electronic Arts values equality and meritocracy, we are committed to an employment environment that is free from all aspects of illegal discrimination. We always employ, retain, promote, terminate and otherwise treat all employees and job applicants based on merit, qualifications, competence and talent. We apply this policy without regard to any individual's gender, race, color, religion, national origin, ancestry, pregnancy, age, sexual orientation, gender identity, marital or family status, veteran status, medical condition, disability or political belief.

**Harassment.** Harassment has no place at EA. We do not tolerate sexual harassment or harassment based on gender, race, color, religion, national origin, ancestry, pregnancy, age, sexual orientation, gender identity, marital or family status, veteran status, medical condition, disability or political belief, whether it's verbal, physical or visual harassment, or a form of retaliation for any complaint of harassment.

**Confidentiality, Security and Protection of EA's Intellectual Property.** Every employee has a duty to respect the confidentiality of EA's and our business partners' information. We also have a duty to protect the confidentiality of the personal information that our customers supply to EA. In addition, you must refrain from using any confidential information belonging to former employers. We are only to access, use and disclose confidential information that is necessary for us to have in the course of performing our duties. We are not to disclose confidential information to other employees or contractors at EA unless it is necessary for those employees or contractors to have such confidential information in the course of their duties.

We also have a duty to protect EA's intellectual property and other business assets. We take our intellectual property, business systems and the security of Company property very seriously. Good security, working practices and procedures for Company property, in all its forms, are critical in protecting the intellectual property development that fuels our Company's growth, the livelihood of our employees, and our shareholders' investments. EA's files, personal computers, networks, software, internet access, internet browser programs, email, voice mail and other business equipment (e.g., desks and cabinets) and resources are provided for business use and they are the exclusive property of the Company. Misuse of such Company property is not tolerated.

Many EA employees are creative by nature and want to continue their creative activities outside of work. Note, however, that employees must receive written permission from the EA Vice President for his or her organization before developing, outside of EA, any intellectual property that is or may be related to our current or potential business. Please speak to your Human Resources representative to assist in following procedures regarding permissions.

These and other obligations relating to confidentiality, security and EA's intellectual property can be found in your employment agreements as well as EA's [Global Information Security Policy](#).

**External Communications.** Occasionally, EA employees are contacted by outside sources requesting information about company matters, including EA product and financial information, information regarding current or former employees, EA projects, and/or other workplace issues. In order to avoid disclosing inaccurate, incomplete, confidential or proprietary information, if you are contacted by any outside source regarding EA, you should decline to comment and immediately contact an appropriate EA representative as detailed in EA's [Worldwide External Communications Guidelines](#).

**Substance Abuse.** Although celebrations are an important part of EA's culture and we permit moderate consumption of alcohol (if you are of legal age) at certain Company meetings and other events, our policy on substance abuse is quite clear:

- Any use of illegal drugs by employees, visitors or contractors on Company premises at any time of day or night or at any EA sponsored event is prohibited.
- Employees shall not attempt to perform work for EA while under the influence of any illegal drug. An employee who must take a legal drug (e.g., prescription medication) due to a physical or mental disability is required to discuss the situation with HR if there is a chance that the drug may influence work performance or behavior at work.

- While we continue to permit moderate consumption of alcohol at certain Company events which almost always are at the end of a work day, work week, or on holidays, we strongly urge employees to be responsible in their use of alcohol and not to drive under the influence of drugs or alcohol. Employees shall not attempt to perform work for EA while under the influence of alcohol.

**Violence.** Violence of any kind is unacceptable at the workplace, at an EA-sponsored event, or during any time you are acting on behalf of EA. This includes actual physical conduct as well as threats, intimidation and portrayals of violence in pictures or written materials (except for legitimate business purposes). Furthermore, weapons are prohibited on Company property and while off site conducting EA business.

**Conflicts of Interest.** Act with Integrity is one of the EA Actions, and we need to ensure that all of our business interactions reflect the importance we place on this particular value. The Conflict of Interest policy sets minimum guidelines within which we all must act to maintain integrity in the work we do.

As a representative of EA, it is important that we use good judgment in how we conduct ourselves in the marketplace. Towards this end, we are expected to avoid any activity that creates an actual or potential conflict of interest (i.e., any situation in which our actions or loyalties are divided between personal interests and EA's interests, or between EA's interests and those of another). If unsure of whether a conflict exists, you should consult your supervisor immediately. The following activities are some examples of conflicts of interest, which are prohibited for all EA employees (including executive officers) without prior written approval from a member of your management chain or, in the case of executive officers, approval by the Board of Directors (or a Committee of the Board designated for such purpose):

- Owning, operating, acting as a director for or being employed as an employee or consultant by any business that competes, directly or indirectly, with EA or that is related to the business of EA.
- Engaging in any business transaction with EA except in connection with our regular employee programs.
- Entering into a new, or significantly expanding an existing, direct or indirect personal financial relationship with a competitor, customer, or supplier; however, no conflict will exist in the case of ownership of less than 1 percent of the publicly traded stock of a corporation. Any significant expansion of an existing financial relationship will require a separate, prior written approval.
- Awarding a contract or entering into a financial transaction on EA's behalf (or encouraging other EA employees to do so) with a family member or someone with whom you have a significant personal or financial relationship.
- Engaging in any other employment or extensive personal projects during work hours, or using EA property in other employment.
- Soliciting EA employees, vendors, or customers to purchase goods or services of any kind for purposes not related to our business, or to make contributions to any organizations or in support of any non-EA authorized causes.
- Soliciting or entering into any business or financial transaction with an employee whom you supervise, either directly or indirectly.

In addition to the above activities that require prior written approval, EA employees (including executive officers) are required to promptly notify their manager or supervisor of any of the following events:

- Receiving and/or giving gifts valued at greater than \$250.00 or which are outside of the bounds of reasonable and customary gifts (note that, in accordance with EA's Global Anti-Corruption Policy, gifts provided to government officials must also be less than \$250.00 and must not be in cash). A reasonable and customary gift could be, for example, a modest Christmas gift or a modest congratulatory gift upon completion of a contract negotiation. Report the gift to your direct supervisor using EA's online [Conflict of Interest Reporting Tool](#). In addition, if you are giving a gift, it is your responsibility to ensure that your conduct complies with the limitations and approval requirements of EA's [Global Travel and Entertainment Spending Policy](#) and [Global Anti-Corruption Policy](#).
- Soliciting or entering into a romantic relationship, or having a family relationship, with an employee whom you either supervise, directly or indirectly, have influence over career decisions, or have access to sensitive personnel data. This guideline helps to ensure fair treatment and judgment across all employee decisions.
- Acting as a director for any for-profit organization (however, acting as a director for a for-profit or non-profit organization that competes, directly or indirectly, with EA, or whose business is related to the business of EA, is generally discouraged as a conflict of interest and requires prior written approval as discussed above).
- Learning that a company with which you have an existing financial relationship (other than ownership of less than 1 percent of a publicly traded corporation), that was not at the inception of the relationship a competitor, customer or supplier of EA, has become a competitor, customer, or supplier of EA.

Directors engaging in activities that could give rise to an actual or potential conflict of interest are expected to promptly notify the Chair of the Nominating and Governance Committee (or, if the director is the Chair of the Nominating and Governance Committee, another member of the Nominating and Governance Committee) and recuse themselves from participation in any deliberations or decisions made by the Board of Directors (or any Committee of the Board of Directors) relating to the matter giving rise to the actual or potential conflict.

### ***Special Ethical Considerations for Employees With Financial Reporting Obligations.***

It is essential that our financial records, including all filings with the Securities and Exchange Commission, be accurate and timely. Accordingly, in addition to adhering to the Conflict of Interest Policy and the other policies and guidelines in this Code, senior financial officers and the Chief Executive Officer must take special care to Act with Integrity at all times and to instill this value within their organizations. In particular, these senior officers must ensure their conduct is honest and ethical, that they abide by all public disclosure requirements by providing full, fair, accurate, timely and understandable disclosures, and that they comply with all other applicable laws and regulations.

***Securities Trades By Electronic Arts Personnel.*** If a director, an executive officer or any employee of Electronic Arts or of any EA subsidiary has material, non-public information relating to Electronic Arts, it is EA's policy that neither that person nor any related person may buy or sell securities of Electronic Arts or engage in any other action to take advantage of, or pass on to others, that information. This policy also applies to trading in the securities of any other company, including our customers or suppliers, if you have material inside information of that company obtained in the course of employment by EA. Further details regarding trading by EA employees can be found in

[EA's Policy on Securities Trades by Electronic Arts Personnel](#). All employees are expected to read and abide by this policy.

***Integrity and Fair Dealing in the Marketplace.*** While EA competes vigorously in all of its business activities, we remain committed to dealing fairly with our customers as well as our competitors and conducting our activities in accordance with applicable antitrust and competition laws. This includes complying with all applicable requirements under the U.S. federal and state antitrust laws and other applicable U.S. laws and government regulations, as set out in our U.S. Antitrust Policy, and the antitrust and competition laws of the various territories where we do business. Since we are a global enterprise, we must also ensure integrity in our operations worldwide, and compliance with the anti-corruption laws of the territories where we do business is a part of our global efforts. These laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, make it unlawful to pay or accept bribes of any kind. More information about our antitrust and anti-corruption principles can be found in EA's [U.S. Antitrust Policy](#), [Global Anti-Corruption Policy](#), and from the Legal Department.

***Raising Issues and Concerns Relating to the Code.*** This Code of Conduct reflects the importance of Acting with Integrity in everything we do here at EA. If you have any questions regarding your own conduct and how to act consistently with this Code, please seek assistance from any appropriate individual. If you believe there has been a violation of this Code of Conduct, you have a responsibility to report it. You may bring any concerns you have to your Human Resources representative or any member of your management chain.

We have a specific process in place for reports of violations of the financial reporting obligations under this Code, accounting or internal auditing matters and/or the federal securities laws and regulations. If in this category, employees, directors or shareholders can make reports to the [General Counsel](#) or, if you feel it is important to remain anonymous, you may make a report to the Audit Committee by (1) calling 1-800-249-5916 (in the US) or (503) 748-0520 (outside of the US), or (2) using our anonymous, third-party online reporting tool at [https://secure.ethicspoint.com/domain/en/report\\_custom.asp?clientid=8089](https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=8089).

All reports concerning violations of this Code will be investigated promptly by Human Resources, the EA Legal Department, the Audit Committee and/or an outside investigator, as appropriate. Anyone violating this Code will be subject to discipline up to and including termination. In addition, any violations of law will be reported to the appropriate law enforcement authorities.

Any waivers of the provisions of this Code for executive officers or directors must be approved by the Board of Directors. All such waivers, and the reasons for them, will be publicly disclosed within five business days (or such shorter time period as may be required by applicable law or regulations).

*It is against EA policy to retaliate against any employee for raising complaints in good faith.*

*The information above is the most recent company statement on this subject and supersedes any prior information. EA reserves the right to make future modifications to the above statements. EA policies do not create a contract, implied or otherwise.*