



# UBISOFT SUPPLIER CODE OF CONDUCT

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# **TABLE OF CONTENTS**

**1 BUSINESS ETHICS**

**2 HUMAN RIGHTS**

**3 INFORMATION PROTECTION**

**4 ENVIRONMENT**

**5 REPORTING OF VIOLATIONS**





Ubisoft is committed to respecting and ensuring compliance with ethical principles and the protection of human rights and the environment throughout the Ubisoft value chain. This Supplier Code of Conduct aims to ensure such compliance with international standards and to promote structural improvements.

Suppliers shall respect, uphold and enforce this Supplier Code of Conduct with their internal teams as well as with their own suppliers and/or subcontractors in the course of their business relationship with Ubisoft. Suppliers shall comply with all applicable laws and regulations. Where reference is made to "all laws and regulations" in this Supplier Code of Conduct, this includes national and local laws and regulations, as well as treaties, standards and applicable voluntary industry norms. If matters covered by this Supplier Code of Conduct are also covered in a contract between Ubisoft and Supplier, the highest standard shall apply. This Supplier Code of Conduct is subject to change.

In this Supplier Code of Conduct the term "shall" indicates a requirement and the term "encourage" does not indicate a requirement.

# BUSINESS ETHICS

## 1 Anti-corruption and ethical business practices

Suppliers shall conduct their business complying with all anti-corruption laws applicable in any country in which the Supplier manages operations or provides services.<sup>[1]</sup>

Suppliers shall act with integrity by respecting ethical business practices.

Suppliers shall condemn and act against any form of corruption (including bribery, extortion, embezzlement and influence peddling) including actions that could be construed as such.<sup>[2]</sup> Suppliers shall strictly prohibit their employees and staff from granting, offering or giving any undue advantages to anyone (including a company, a private individual, employee or representative of a governmental entity of any country) for the purpose of obtaining preferential treatment or an undue advantage in the conduct of business.

## 2 Conflicts of interests

Suppliers shall refrain from any conflict of interest that could alter the objectivity and independence of judgment in the course of their business relationship with Ubisoft. Suppliers shall disclose any potential or actual conflict of interest to Ubisoft.<sup>[3]</sup>

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<sup>[1]</sup> Corruption is generally defined as soliciting, promising, authorizing, offering or accepting, directly or indirectly, an undue advantage of any sort (financial or otherwise), from a person (customer, supplier, intermediary, partner, public officials...) in order for the recipient of this undue advantage to perform, delay or omit to perform an act within the scope of their duties.

<sup>[2]</sup> Influence peddling takes place when a person receives – or solicits – offers, promises, donations or any other advantages with the aim of abusing their influence, real or supposed, to induce a third party to take a decision favorable to the interests of the beneficiary (awarding of contracts, jobs, distinctions or other favorable decision).

<sup>[3]</sup> A conflict of interest arises when a person's private interests influence that person's decisions or actions at work. A conflict of interest can be actual, potential or perceived.

### **3 Gifts and invitations**

Suppliers shall avoid any exchange of gifts in order to gain an unfair competitive advantage (including cash or cash equivalents, entertainment, gift cards, product discounts and non-business activities). Ubisoft imposes some restrictions on gifts and invitations with its suppliers, in terms of value and timing. Suppliers shall avoid offering high-value gifts and shall refrain from offering gifts to Ubisoft or Ubisoft employees at inappropriate times such as during a bid or a selection process, a negotiation, or the signing or renewal of contracts. Ubisoft encourages its suppliers to have a process to investigate and report any violation of this policy.

### **4 Competition and antitrust**

Suppliers shall deal fairly with each of their partners. They shall engage in open and competitive bidding, and not enter into formal or informal anti-competitive arrangements.

### **5 Anti-money laundering**

Suppliers shall commit to prevent money laundering in all its forms. They shall ensure that their transactions are transparent and accurate. All behaviors of fraud and dishonesty shall be prohibited.

### **6 Trade restriction**

Suppliers shall respect all trade restrictions and international sanctions, taking into account their evolution, as well as laws and regulations regarding export control. Suppliers shall not deal with any sanctioned persons, entities or organizations, nor trade, directly or indirectly, with sanctioned countries in each case if such dealing or trade activity falls within the scope of the sanctions.

### **7 Information Transparency**

Suppliers shall provide clear and accurate information on the methods and resources used in the making or producing of products sold or services provided to Ubisoft (production sites, characteristics of the products or services provided, etc.). Suppliers shall not make any misleading claims. Suppliers shall share all information useful to Ubisoft in order to guarantee this Supplier Code of Conduct is respected and upheld.

## **8 Confidentiality, communicating and acting on behalf of Ubisoft**

Suppliers shall be vigilant when communicating and acting on behalf of Ubisoft. They shall ensure that their public statements respect their commitment to confidentiality and professional secrecy, and they shall not speak on behalf of Ubisoft (or using Ubisoft's name or logo) unless expressly allowed to do so in writing by Ubisoft.

## **9 Protection of intellectual property**

Suppliers shall respect all the applicable laws regarding intellectual property rights and the intellectual property of Ubisoft, its licensees and partners.

## **10 Responsible sourcing of materials and minerals**

When buying raw materials or rare minerals, suppliers shall guarantee that they do not source from conflict-affected areas.

# HUMAN RIGHTS

Suppliers shall respect and promote the human rights of their workers (including temporary, migrant, student or any other type of worker). Suppliers shall respect applicable laws as well as international labor standards as a minimum, including the core Conventions of the International Labor Organization (“ILO”) and legislation prohibiting slavery and human trafficking.

## 1 Child labor and young workers (ILO C138) (ILO C182) (ILO R146)

Suppliers shall ensure that their hiring practices are in conformance with their national law and with the ILO Conventions related to child labor and young workers (ILO C138, ILO C182 and ILO R146). In this regard, Suppliers shall prohibit employment of child<sup>[4]</sup> labor as defined below. Suppliers shall ensure young workers<sup>[5]</sup> (as defined below) are not exposed to hazardous working conditions or to working conditions that are likely to jeopardize their health, safety, or moral wellbeing. Suppliers shall have an appropriate mechanism to check the age of workers and to ensure they are compliant with ILO standards and with local regulations.

## 2 Modern slavery and forced labor (ILO C029)

Suppliers shall not employ individuals against their will. Suppliers shall comply with applicable law and with the ILO Conventions related to the prohibition of forced labor (ILO C029). Suppliers shall ensure that all work is voluntary and prohibit traffic of persons or any form of slavery, forced, bonded or exploitative prison labor.

Suppliers shall guarantee the freedom and right of employees to quit.

Suppliers shall not retain the possession or control of the original identification papers of their workers (passports, identity papers, travel documents and other personal legal documents). Suppliers may only ask for copies of workers’ original identification papers.

Suppliers shall prohibit the use of violence as a disciplinary sanction for their employees.

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[4] A child is defined as any person under the age of 15 years, unless the minimum age for work or completion of mandatory schooling is higher by local law, in which case the stipulated higher age applies in that locality.

[5] A young worker is defined as any worker under the age of 18 but over the age of a child, as defined above. It includes apprentices, interns and student workers.

### **3 Recruitment and non-discrimination (ILO C181) (ILO C111)**

Suppliers shall comply with applicable law related to the recruitment of employees and prohibition of discrimination, and with the related ILO Conventions (including ILO C181 and ILO C111). Suppliers shall make sure that there are not any recruitment fees borne by workers. Suppliers should create management systems to ensure that workers in their immediate and extended supply chains are not forced to pay for employment.

Suppliers are encouraged to apply the principles of inclusive recruitment (recognizing diversity, ensuring fair hiring practices, leveling the playing field, fighting against recruitment bias and discrimination).

Discrimination occurs when a person is treated less favorably than others on account of personal characteristics unrelated to the inherent requirements of their employment. Discrimination can be direct, when rules or practices explicitly point out a specific characteristic, or indirect, when they lead in practice to differential behavior or exclusion. Characteristics used to discriminate include: geographic origin and location, sex, sexual orientation, gender identity, age, family name, family responsibilities, marital status, apparent or known economic vulnerability, belonging or non-belonging (real or supposed) to an ethnic group, nation or race, political opinions, union activities, religious beliefs, physical appearance, religion, health, genetic characteristics, disability.

### **4 Maintaining healthy and safe working conditions (ILO C155)**

Suppliers shall ensure physical and mental safety for each of their workers, by providing a safe and healthy working environment in order to avoid accidents or injuries that could be caused by their work. They shall provide, where necessary, adequate protective clothing and protective equipment to prevent risk of accidents or of adverse effects on health.

Suppliers shall ensure that workers can effectively report health and safety incidents. Suppliers shall also establish a system to investigate, track and manage such reports. Suppliers shall provide their workers access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. If a housing facility is provided, Suppliers shall ensure physical safety to their workers and their families.

### **5 Freedom of association (ILO C087)**

Suppliers shall recognize and respect the rights of their employees to form or join (or refrain from joining) trade unions or organizations of their own choosing within the appropriate national legal framework. Suppliers shall also respect the rights of workers to communicate openly with management and to be protected from adverse consequences.



## **6 Working hours and resting time (ILO C001) (ILO R116) (ILO C106)**

Suppliers shall comply with applicable law and with the ILO Conventions related to working hours and resting time. Suppliers shall ensure that working hours (overtime included) do not exceed the most stringent applicable legal requirements, either local, national or international. Working hours of workers subject to working time regulations shall respect the limitation of sixty hours per week including overtime. Suppliers shall grant a rest period of at least 24 consecutive hours every seven days or at least 48 consecutive hours every fourteen days.

## **7 Wages and benefits (ILO C131) (ILO C001)**

Suppliers shall pay their employees at least the legal minimum standards and provide any benefit required by law. Suppliers shall also ensure that workers receive equal pay for equal work, without regard to gender or any difference that is considered discriminatory. Suppliers shall compensate workers for overtime hours at the legal rate.

## **8 Anti-harassment and anti-discrimination training**

Suppliers are encouraged to have clear rules on anti-harassment and anti-discrimination matters and to raise awareness and train their employees (e.g., train employees and managers on what behavior is acceptable or not, and what they can do to avoid different forms of discrimination, harassment and retaliation). Harassment and/or discrimination in all their forms will not be permitted, by a Ubisoft employee on a Supplier employee or vice versa. Any inappropriate behavior should be reported.

## **9 Migrant workers**

Suppliers shall verify that migrant workers<sup>[6]</sup> are employed in full compliance with the immigration and labor laws of the host country.

## **10 Paid leave and parental leave (ILO C132)**

Suppliers shall comply with applicable law and with the ILO Conventions related to paid leave and to parental leave.

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<sup>[6]</sup> A migrant worker is defined as an individual who is to be engaged, is engaged or has been engaged in a remunerated activity in a state of which he or she is not a national.

# INFORMATION PROTECTION

## 1 Respect of applicable laws and regulations

Suppliers shall comply with all applicable laws and regulations regarding the protection of personal data, and in particular the General Data Protection Regulation (GDPR) which is set out as the minimum standard for the protection of personal data.

## 2 Security framework and Data Security

Suppliers should implement a security framework and maintain a level of security to no less than the industry standard to protect data and protect confidentiality of the data through a data access management system.

Suppliers should establish a disaster recovery plan in case of an incident regarding personal data. Suppliers should also ensure they have robust breach detection, investigation and internal reporting procedures in place.



# ENVIRONMENT

## 1 Laws and regulations

Suppliers shall identify and comply with environmental laws and regulations applicable to their activities in their operating countries.

## 2 GHG emissions reduction (following Science Based Targets initiative criteria)

Reduction of the carbon footprint is important to Ubisoft and Suppliers have a key role to play. Ubisoft commits that 67% of its suppliers will have science-based targets by 2026. Suppliers are encouraged to measure their carbon footprint on scopes 1, 2 and 3 and report the carbon impact of products/services sold to Ubisoft. Suppliers are also encouraged to have science-based Greenhouse Gas (GHG) emissions reduction targets to limit global warming to 1.5°C and implement methods to achieve them (use of clean energy, energy efficiency, conservation, recycling).

## 3 Pollution

Suppliers are encouraged to identify, manage, and reduce the risk of environmental hazards from their operations, either waste (solid waste, e-waste, non-hazardous waste) or pollution (air pollution, effluent discharge, contamination of stormwater).

## 4 Resource consumption management

Suppliers are encouraged to regularly quantify, manage, and reduce consumption of all resources such as energy (electricity, fossil fuel), water, hazardous substances, minerals, and other raw materials and resources.



## **5 Communicate about environmental impacts**

Suppliers are encouraged to promote environmental impact assessments and mitigation through their teams, their partners (raising awareness among employees, customers, business partners) and their supply chain, whenever possible and appropriate.

## **6 Training employees**

Suppliers are encouraged to give their employees as much information as possible about the environmental impact of their jobs so they can find ways to reduce the footprint of their work.

# REPORTING OF VIOLATIONS

Suppliers shall report to Ubisoft any violation of the requirements of this Supplier Code of Conduct. Suppliers should not retaliate against any employee who has reported violations of this Supplier Code of Conduct. In case of a crisis linked to any of the topics listed above, Suppliers are asked to inform Ubisoft.

Ubisoft has opened a secure and anonymous online whistleblowing platform, [Whispli](#) aimed at collecting reports from any person who witnesses violations of Ubisoft's Code of Conduct or any breach of international or local law on the part of our stakeholders.

This mechanism is hosted by a platform independent from Ubisoft, which guarantees the protection of the whistleblower. Ubisoft is committed to dealing with all reports of misconducts and to follow a timely and impartial process for their management and investigation. Ubisoft is also committed to maintaining confidentiality at all stages of the reporting and investigation process. Whistleblowers may choose to remain anonymous, or allow the individuals tasked with investigating the alert to be informed of their identity. They can thus report any form of potential violation without fear of retaliation.

In the event of non-compliance with this Supplier Code of Conduct, Ubisoft will determine with the Supplier what corrective measures should be put in place to allow the continuation of the commercial relationship. Supplier shall implement any measure necessary to put an end to the breach, and this without prejudice to the possibility for Ubisoft to immediately terminate the business relationship with Supplier. Ubisoft will provide support and advice to any supplier to improve its practices to meet the objectives of this Supplier Code of Conduct.

## **Control and compliance**

Suppliers authorize Ubisoft and its designated agents (including third parties) to perform monitoring activities to attest the compliance with this Supplier Code of Conduct, including on-site inspections and audits, accounting reviews of workers, and individual one-on-one interviews with workers.

Suppliers shall also take all actions to satisfy the compliance requirements raised by Ubisoft, including the completion of all questionnaires and documents, participating in any compliance investigation and providing any information necessary to verify compliance with this Supplier Code of Conduct.

## Supplier Commitment

Suppliers acknowledge they have read and understood this Supplier Code of Conduct and agree that they shall comply with its requirements.

The Ubisoft Supplier Code of Conduct will be part of the Request for Proposal and its acceptance by the Suppliers will be one of the criteria that will be assessed by Ubisoft during the selection process.

**SUPPLIER NAME:**

**BY:**

**TITLE:**

**DATE:**

**SIGNATURE:**

