

## **SLAVERY & HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING 31 MARCH 2021**

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Ubisoft slavery and human trafficking statement for the financial year ending 31 March 2021.

### **1. Structure**

Ubisoft's main business activities are concentrated around the production, publishing and distribution of video games for consoles, PC and smartphones. Business activities of subsidiaries of Ubisoft Entertainment SA (the parent company which shares are listed on Euronext Paris) may be summarised as follows.

**Production subsidiaries:** these are responsible, under the supervision and within the framework set out by the parent company, for the design and development of the software, including in particular the scenarios, animation, gameplay, layouts and game rules, as well as the development of design tools and game engines, enhanced by the increasingly direct relationship with player communities.

**Sales and marketing subsidiaries:** these are in charge of the worldwide distribution of Ubisoft products in physical and digital format, under the supervision of and within the framework defined by the parent company. They are also in charge of implementing local marketing strategies and campaigns associated with game promotion, as decided by the parent company.

In the United Kingdom, Ubisoft Ltd, a wholly-owned subsidiary of Ubisoft Entertainment SA, is a distributor of computer and video games software to the UK and other export markets. Ubisoft Ltd wholly owns Ubisoft Reflections Ltd, Ubisoft CRC and Future Games of London Ltd (a game studio specialising in free to play games for mobile and tablet devices).

### **2. Commitment**

Ubisoft Entertainment SA and its subsidiaries (the “**Group**”) is committed to respect human rights, fundamental freedoms, health & safety of its teams, its players and its suppliers in all the countries where it operates. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and, in so far as is possible, to requiring our suppliers hold similar ethos. As a group, and at a local level, including at the level of our subsidiaries in the United Kingdom, Ubisoft is committed to working on and, as may be appropriate, improving our practices to help fighting against slavery and human trafficking.

### **3. Code of Conduct**

In 2016, the Group finalised a Code of Conduct in order to give employees guidelines and key contacts to address sensitive situations they may face on a daily basis. This Code of Conduct has been distributed to Ubisoft teams since beginning of 2017. This Code has been entirely revamped and rewritten in 2021 and was subsequently shared with all employees and signed by them. A chapter is dedicated to our commitment towards Human Rights. In this chapter, our commitment to fight modern slavery and human trafficking is explicitly outlined. This Slavery & Human Trafficking statement is also attached, allowing each employee to read it and to share it with business partners. Another chapter focuses on fair treatment of suppliers and partners. In this chapter, it is reminded to all teams that respect of human rights & fundamental freedoms (including labour rights) is part of the criteria to assess suppliers.

#### **4. Duty of Care Plan**

##### **a. General**

In its annual report for fiscal year 20-21, Ubisoft Entertainment SA published a “Duty of Care plan” in accordance with French regulation No. 2017-399 (the “**Duty of Care Regulation**”), which has extra-territorial reach. It focuses on measures to identify and prevent risks of serious rights abuses regarding human and fundamental freedoms, health and safety of people and the environment, linked to the activities of the contractors or suppliers with whom Ubisoft has an established business relationship. Risks associated with the direct activities of Ubisoft and its subsidiaries are described in the chapter dedicated to Corporate Social Responsibility (“**CSR**”) of the annual report: <https://www.ubisoft.com/en-us/company/about-us/investors>

##### **b. Ubisoft teams**

Concerning Ubisoft teams, all employees are bound by written employment contracts to mitigate risks of forced labour and child labour, and all employees are required to sign Ubisoft’s Code of Conduct.

##### **c. Supply chain**

On the supply side, the Group conducted a risk mapping on all its purchases across the world. This analysis focused on the risks of human rights abuse, work of children, forced labour, conditions of health and safety at work and the risk of severe violations to the environment.

##### ***Purchases related to video game production and collectibles***

The Group deployed a specific monitoring process regarding production of physical game supports and collectibles based on the volumes of purchases, countries of production and direct contact of these products with customers. The production of video game physical supports (discs and cartridges, boxes) is framed by the 'First parties' specifications that incorporate criteria related to the respect of human rights

and fundamental freedoms, health and safety of people and the environment. Nearly all of manufacturing assemblers and logistical providers of Ubisoft are thus certified ISO 9001, guarantor of the process 'Safety and quality', or even ISO 14001, which is environment-specific.

With regards to collectibles, a dedicated compliance team is responsible for selecting contractors who meet the criteria of Ubisoft specifications including financial, quality, and CSR criteria. Thus, Ubisoft teams sent reminders to all relevant subcontractors regarding the importance of CSR regulation especially the Duty of Care Regulation. Subcontractors also had to sign "Quality Guidelines" in which they agree to respect fundamental human rights, health and safety at work and the protection of the environment. Compliance with such fundamental rights are also covered through contractual clauses that our main suppliers signed.

Also, all new contractors or subcontractors (with a new order) which are identified as "high risk" are subject to on-site social audits conducted by an independent third party, on the basis of the SA 8000 standard (which incorporates the standards of the United Nations and of the International Labour Organization regarding child labour, forced labour, working time, health and safety, respect for the environment, etc.). Depending on the results of these audits, corrective action plans are discussed with and agreed upon by contractors and subcontractors and progress are monitored throughout the relationship by the team in charge (to ensure that practices are improving and correspond to Ubisoft standards). These measures can potentially apply to tier-1 contractors as well as tier-2 or tier-3 subcontractors, depending on the level at which manufacturing operations where risks have been identified take place. The implementation of these measures is audited on a yearly basis during the audit of our CSR annual report.

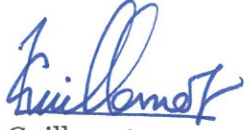
#### Other purchases

A similar process is being deployed for non-related video game purchases so that Ubisoft procurement teams assess the level of risk for new and existing suppliers regarding their compliance with human rights and fundamental freedom, health and safety conditions and environmental protection. Different steps and degrees of diligence are implemented depending on the risks associated with a particular supplier. For relationships for which a risk has been identified, specific tools are deployed (specific contractual clauses for instance).

### **5. Whistleblowing system**

A whistleblowing system has been put in place and deployed globally in 2020. It allows teams to alert anonymously on potential breaches by suppliers and subcontractors regarding human rights, fundamental freedoms, health and safety and environment protection. This system also includes alerts related to bribery and influence peddling. All reports are received and processed by a specific task force of internal experts at company HQ. Depending on the veracity of allegations and the gravity of the abuses reported, reports can lead to termination of the contractual relationship with the supplier or business partner.

Ubisoft's commitment to social responsibility extends beyond the manufacturing and supply chain process. To find out more about our CSR efforts, please read the CSR chapter in the annual report: <https://www.ubisoft.com/en-us/company/about-us/investors>



Yves Guillemot  
Ubisoft Entertainment SA  
Chairman of the Board of Directors and CEO

Date: September 3<sup>rd</sup>, 2021