

MSA STATEMENT 2019

INTRODUCTION

This statement is intended to fulfil the legal requirement under Section 54(1) of the UK Modern Slavery Act 2015, which requires Combined Distribution (Holdings) Limited (defined as “CDH”, “we” and “our”) to produce a statement sharing their efforts to combat modern slavery in their supply chains and business operations.

This statement is made in relation to the financial year 2019 ending on 31 December 2019.

OUR STRUCTURE, BUSINESS AND OPERATIONS

Combined Distribution (Holdings) Limited is part of Activision Blizzard group of companies (“**Activision Blizzard Group**”). Activision Blizzard, Inc. (“**Activision Blizzard**”) is a leading global developer and publisher of interactive entertainment content and services and conducts its business through three reportable segments - Activision Publishing, Inc., Blizzard Entertainment, Inc. and King Digital Entertainment; and through other businesses such as Activision Blizzard Studios and Activision Blizzard Distribution.

The Activision Blizzard Distribution business consists of operations in Europe that provide warehousing, logistics and sales distributions services to third-party publishers of interactive software, its own publishing operations and manufacturers of interactive entertainment software.

As part of Activision Blizzard Group, Combined Distribution (Holdings) Limited participates in Activision Blizzard Group’s collective, global approach to human rights obligations and certain measures described below are undertaken on a group level and apply to all Activision Blizzard Group companies.

In addition, Combined Distribution (Holdings) Limited implements its own unique measures that only apply to its business and direct subsidiaries (“**CDH Subsidiaries**”) listed below:

- **Combined Distribution (Holdings) Limited**, Company Number 03136477
- **Centresoft Limited**, Company Number 01673860
- **P.D.Q. Distribution Limited**, Company number 02105582
- **Advantage Entertainment Distribution Limited**, Company Number 04472310

CDH and its direct subsidiaries are principally engaged in the distribution of entertainment software, games consoles, low cost business software and peripherals and the provision of distribution services to publishers of computer games.

We conduct our business through the following subsidiary undertakings:

CentreSoft Limited is a leading distributor of entertainment software, electronic sales, games consoles and peripherals.

PDQ Distribution is a leading third party logistics distributor whose primary role is the provision of services in the bulk warehousing and distribution of software entertainment and peripherals.

Advantage Entertainment Distribution Limited is a leading distributor of entertainment software, games consoles and peripherals.

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OUR APPROACH

Operating with integrity and honesty and striving to maintain the highest levels of corporate governance practices throughout Activision Blizzard group companies' operations are fundamental aspects of its business philosophy. As the group evolves and grows, both organically and through acquisition, it carefully monitors changes in its business operations, as well as changes in the laws and regulations in the jurisdictions where it operates. As a result, it frequently reviews and refreshes many of its policies and initiatives. During 2018, the Activision Blizzard group's policies and initiatives reviewed and refreshed included:

- **Code of conduct:** Our employee Code of Conduct ("**COC**") establishes the ethical foundation for every employee in our group and sets the expectation that our staff should follow applicable laws and report their concerns of any illegal or unethical activity through various means. The COC is distributed to all employees and published on our intranet. We require each employee to acknowledge the COC and be bound by its terms on a yearly basis. The COC is bolstered by the Anti-Corruption and Anti-Bribery Policy and the Reporting and Non-Retaliation Policy as well as many other policies. The COC and its related policies can be viewed on the Corporate Governance section of Activision Blizzard corporate website ("**Corporate Governance Site**").
- **Integrity Line:** For many years, our group has maintained a hotline and online reporting system through which our employees can confidentially and, if they desire, anonymously, report any concerns about the actions of others, both internally and externally. Reports submitted through the Integrity Line are automatically directed to appropriate members of the Compliance team. They are escalated and/or investigated as appropriate.
- **Way2Play Online Training:** our online Way2Play training is mandatory for all existing employees and forms a core part of our new hire induction process. The training helps our employees navigate the right "way to play", exploring many of the key concepts in our Code of Conduct - our ethical foundation and our guide to living our values and doing business the right way.
- **Sponsored Social Media Policy:** Using good judgement is a key tenet of this policy, which prohibits any posts which contain inappropriate or illegal content.

DUE DILIGENCE

We are committed to responsible and compliant manufacturing throughout our supply chain. Our Vendor Code of Conduct ("**VCOC**") (aimed at all our vendors, suppliers, and business associates) sets out the standards we expect individuals and businesses to live up to when conducting business for and with us. The Vendor Code of Conduct was updated in 2017 to explicitly require vendors to take steps to eradicate the use of conflict minerals and associated labour in their supply chains, further protect the rights of protected categories of individuals, and to impose clearer requirements for reporting and remedy of any unlawful or unethical behaviour arising in contravention of that Code.

In addition, CDH and CDH Subsidiaries require all suppliers and business associates to commit to a set of ethical standards ("**Ethical Standards**") which are documented in written contracts. The Ethical Standards include explicit prohibition of forced labour and child labour. We secure contractual rights to audit compliance with the Ethical Standards.

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To detect risks as early as possible, we have also set up a complaints mechanism which will be included in our Ethical Standards. If any of our suppliers or business associates become aware of actual or potential violations of the Ethical Standards, our contracts with them will require that they promptly report these concerns to CDH. Reports submitted through this mechanism will be automatically directed to our Managing Director and appropriate members of the Compliance team for internal review and are escalated and/or investigated as appropriate.

LOOKING AHEAD

We operate in a diverse, complex and rapidly evolving industry and our business models continue to expand and evolve. Accordingly, as our business changes we will need to expand our practices and procedures to address issues relating to modern slavery in new business areas and geographies. Our foundational compliance policies and processes, as described above, provide a strong framework from which we can continue to evolve and grow. We recognize that the challenge of combating modern slavery is a long-term and continuing effort and we intend to continue improving and evolving in this area.

This statement was reviewed and approved on behalf of Combined Distribution (Holdings) Limited and its subsidiaries by David Neal, Managing Director **March 30, 2020**.

Con formato: Sin Resaltar