



Electronic Arts Global Code of Conduct

Electronic Arts has long had an established set of values that reflect a clear vision for the Company. These values provide a roadmap for our growth and a code of conduct that employees can use to guide their day-to-day decision-making.

Our Action Values, our rules on conflicts of interest, insider trading, confidentiality and security, substance abuse, violence and our policies on fair and equal treatment of employees - these form the foundation of our relationships with each other, with our partners and our customers. At EA, we expect each of our employees (including executive officers) and directors to read, understand and follow these guidelines.

What We Stand For. Electronic Arts has long had an established set of values - the ACTION Values - that define how we do business in the marketplace and within our Company. These values are:

<i>Achievement</i>	Meritocracy, Individual Accountability, Rewards for Success
<i>Customer Satisfaction</i>	Identify Key Customers, Build Relationships, Get Feedback
<i>Teamwork</i>	Play Our Positions, Execute Our Key Assignments, Communicate, Offer Enthusiasm and Support, Think EA World
<i>Integrity</i>	Openness / Honesty, Keeping Commitments, Equality: We're a One-Class Society, Ethical Conduct and Full Compliance With Laws
<i>Ownership</i>	Responsibility, Initiative/Working Smart, Manage Both Your Own and Other People's Time Effectively, Self-Expression / Good Citizenship, You're Expected to Express Your Views
<i>Now</i>	Urgency, Do It Now, Priorities, "Live With the Hot Ones", Be The Values, Make the Culture Real

These values are the heart of EA's Code of Conduct and they are supported by our other Company policies, including the following.

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. All new employees receive EA's detailed Harassment Policy and are expected to read and abide by it.

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 New Hire Agreement as well as EA's Global Information Systems Use and 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. Integrity is one of our ACTION values, 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 (however; in accordance with EA's International Business Activities Policy, gifts provided to foreign government officials must be less than \$100.00 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 and Gift 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 Travel and Entertainment Policy and International Business Activities 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 exhibit the Integrity value 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 new employees receive this policy and are expected to read and abide by it.

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 Foreign Corrupt Practices Act (FCPA) is a part of our global efforts. The FCPA is a federal anti-bribery law that makes it unlawful for any U.S. citizen or any representative of a U.S. corporation to give anything of value to a foreign official in order to obtain business. More information about our antitrust and FCPA principles can be found in EA's U.S. Antitrust Policy, the International Business Activities Policy, and from the Legal Department.

Raising Issues and Concerns Relating to the Code. This Code of Conduct reflects the importance of 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 and Canada) or (503) 748-0520 (outside of the US and Canada), or (2) using our anonymous, third-party online reporting tool at 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.