

# Code of Business Conduct

March 2024

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Links are provided to group policies accessible to studios on the **Keywords internal communication tools**.  
For employees at other studios, please contact your **manager** or **local HR team** for a copy of the latest policy

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# Letter from the CEO



## Dear Keywords,

Keywords conducts its business responsibly, operating to the highest standards of honesty, integrity and ethical conduct. We take our wider corporate responsibility seriously and are conscious of the role we play in our communities and our impact on the environment.

To fulfil this aim and as part of our

commitment to being a responsible business, the Board of Keywords has appointed the Chief Operating Officer, Jon Hauck, to oversee this area. This will help to ensure that our business strategy, set out by our Board and senior management, remains aligned with our Responsible Business pillars and expectations of our key stakeholders, as outlined in this Code of Business Conduct.

We are very proud of the thousands of Keywords colleagues across 26 countries, for upholding the highest standards as we engage and grow with our colleagues, our customers and our communities. We recognise that we can always do more and thus will continually seek to improve on our business conduct and our commitments to our environmental and social agenda.

This Code of Business Conduct, alongside our policies and procedures, sets out our company standards. It outlines responsibilities to colleagues, to customers and to the company – how we

should act as individuals in connection with our roles in Keywords. It is important that we understand what these responsibilities are and ensure that our teams act within both the spirit, and the letter of them at all times.

Continuing to nurture the right culture is core to Keywords' future sustainability. At the heart of our culture are [Leadership Principles](#). I encourage all Keywords teams to embrace these principles as we do the very best we can for our projects, our customers and all those with whom we interact.

A handwritten signature in black ink, appearing to read 'Bertrand Bodson'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

**Bertrand Bodson**  
Chief Executive Officer

March 2024

# Introduction and Guidance

## What is the Code of Business Conduct?

This Code of Business Conduct (the “**Code**”) provides the basic foundations to guide our ethical conduct at Keywords Studios Limited and its subsidiaries (together “**Keywords**” or the “**Group**”), setting the highest standards of behaviour and respecting the dignity of others. Any person working within the Group's environment is expected to follow the Code, which establishes the principles of business conduct, linked to our shared culture and values, which set Keywords apart as a great company to work for and the leading provider of creative and technology-enabled solutions to the global video games and entertainment industries.

We are committed to conducting our business responsibly, operating to the highest standards of honesty, integrity

and ethical conduct, and our wider responsibility for the Environmental, Social and Governance impact of what we do. In support of this, we expect all managers to promote the Code and encourage active discussions with colleagues.

We recognise the value of good corporate governance in every part of the business and have adopted the Quoted Companies Alliance Corporate Governance Code.






# Introduction and Guidance

## How to use the Code

The Code is intended as a practical tool we can apply in our everyday working life.

The sections and topics explain the key information to be aware of, some practical steps to follow, and where to get further guidance. It is not possible to cover all situations in the Code, so on the following page there is guidance on how to deal with ethical decisions for anything not specifically covered in this Code, and where we can report our concerns through the Group's whistleblowing process.


The Code does not replace detailed policies and guidelines but is a statement of our principles in a number of important areas. Where there are local laws, we should follow whichever sets the highest standard of behaviour.



Keywords Studios  
Imagine More


## Imagine More with our Leadership Principles

Our Leadership Principles act as a practical tool we can apply in everyday working life, guiding our actions and creating the conditions for us to collaborate, to Imagine More for our partners, ourselves, the games industry and beyond.




### Power of Partnership

We collaborate with our clients as an extension of their team. With shared passion and purpose, we proactively support them in bringing their stories to life.




### One Keywords

We believe in a network with efficiency at its core. Combining the strength of a global platform with the agility of local studios creates our superpower.




### Raise the Game

We embrace technology, innovation and our entrepreneurial spirit to help our clients and the industry thrive. Leveraging the sum of our experience brings new value to gaming and beyond.



### Embrace an Open World

We champion diversity of talent and ideas from every corner of our global community. Inclusivity makes us stronger and enables us to deliver world-class entertainment creation to our partners.



### Trust Through Transparency

We pursue open and honest relationships with our people, clients and communities. Clear and authentic communication is foundational as we create success together.

# Introduction and Guidance

## Ethical Decision-making

Ethical behaviour and decision-making requires colleagues to make judgements and accept personal responsibility beyond legal requirements. When faced with a dilemma or difficult decision in business, on a topic not specifically covered in the Code, ask the following questions:

Is it illegal or unethical?

Does it go against this Code, our Leadership Principles or Group policies?

Is it unfair or harmful to others?

Would it adversely affect the Group if everyone did it?

Would you be uncomfortable if it was publicly reported?

**If the answer is “Yes” to any of these questions, then you should not proceed.**

If it is unclear whether an action breaches the Code, or if you find yourself in a difficult situation, where possible, please gather the relevant information you have, and consult with your manager, or local/ regional HR team to identify the best course of action.

In any fast-growing business, things can go wrong. When mistakes are made, they should be dealt with transparently, and as an opportunity to improve such that every year we are better than before. What cannot be tolerated is a failure or prolonged delay to disclose something that has gone wrong for whatever reason.





# Introduction and Guidance

## Whistleblowing Process

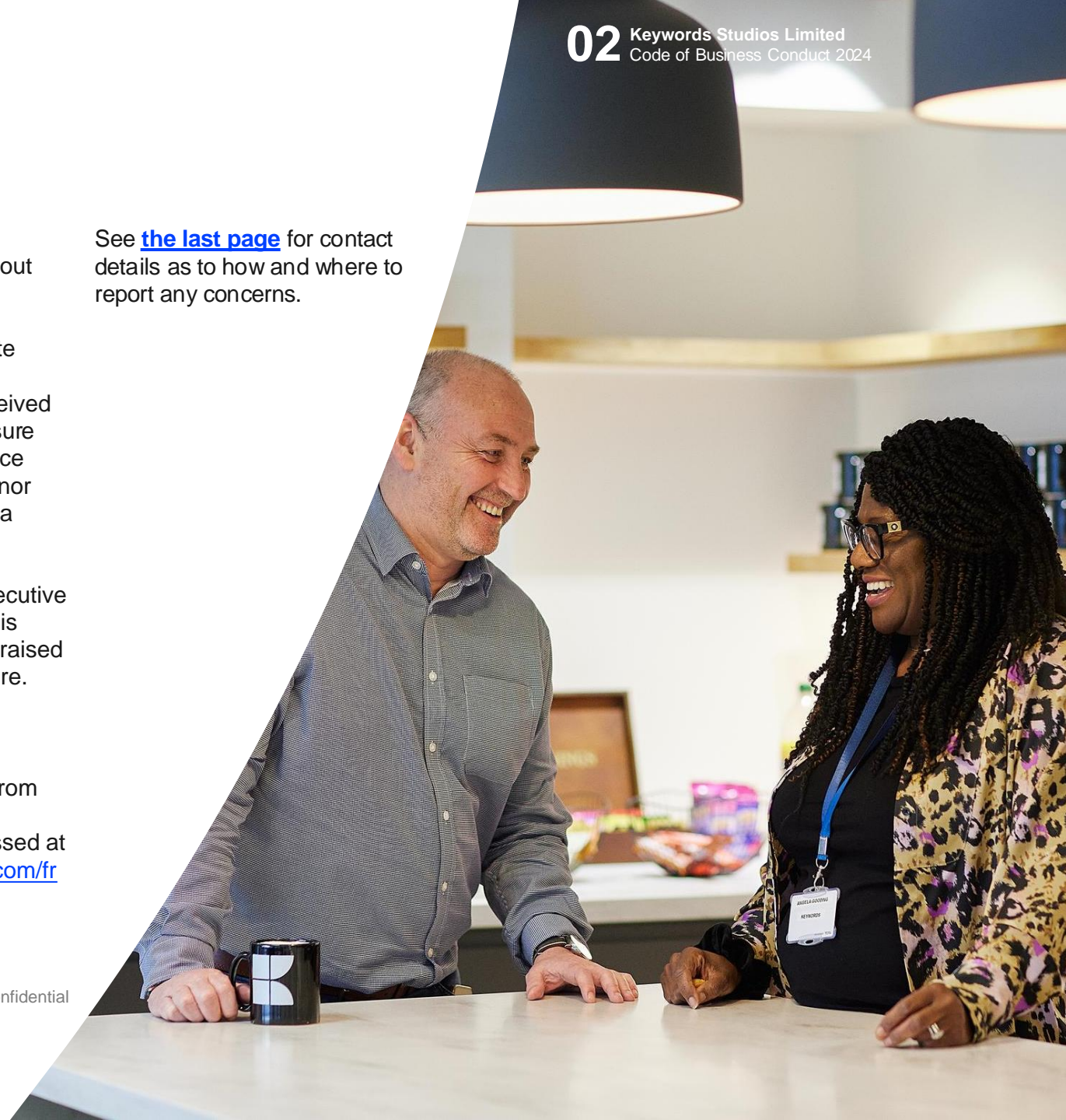
The Group is committed to the highest levels of integrity and accountability and fosters an environment where employees feel confident and supported by the Group in speaking up and shining a light on unethical behaviour. In 2022, we implemented a new whistleblowing portal which allows colleagues and third parties to anonymously raise any concerns about possible irregularities, such as violation of the law, this Code or company policies, should they wish to. Our [Protected Disclosures \(Whistleblowing\) Policy](#) is intended to enable employees to raise concerns beyond their normal reporting lines should they feel this is necessary. Under this policy, an employee can make a disclosure without fear of reprisal or threat of less favourable treatment, subsequent discrimination or disadvantage, as long as it is made in good faith.

Employees have an important role in identifying and reporting concerns about wrongdoing that have come to their attention in connection with their employment. Keywords will investigate genuine and reasonable concerns expressed by its staff relating to perceived wrongdoing in the Group and will ensure that employees can do so in confidence and will not be discriminated against nor suffer detriment as a result of raising a concern.

Keywords has appointed a senior executive to maintain day-to-day operation of this policy and to respond to all concerns raised under the internal disclosure procedure.

For more information, review the [Keywords Protected Disclosures \(Whistleblowing\) Policy](#), available from your local Studio or Intranet. The whistleblowing platform can be accessed at <https://keywordsstudios.integrityline.com/fr/ontpage>.

See [the last page](#) for contact details as to how and where to report any concerns.



# Our People

## Health & Safety

At Keywords, we aim to provide an environment, which is safe, and one that allows employees the opportunity to develop their skills and maximise their personal potential.

The Group does not believe that any task is so urgent as to merit compromising the health and safety of our employees, contractors or visitors. In compliance with local regulations, the Group will endeavour to provide a safe place of work for all employees and will provide any information, training and supervision necessary to protect employees.

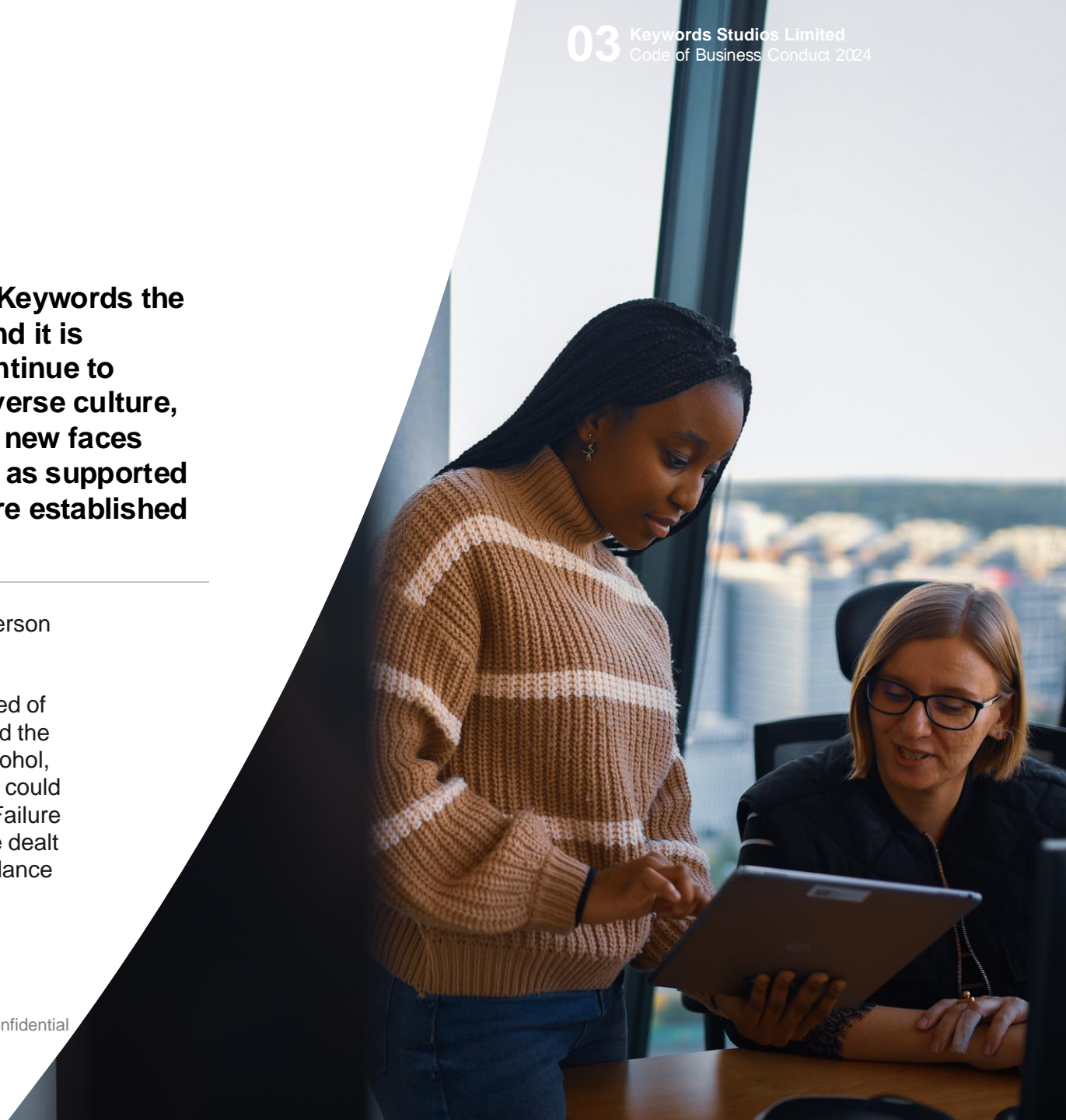
We seek to offer progressive and proactive support when it comes to mental health and wellbeing to prevent ill-health and to foster a working environment that allows our people to feel and perform at their best. We encourage our employees to take reasonable care of their own and other people's welfare and to report any situation that may pose a



**Our drive and talent make Keywords the business that it is today, and it is essential for us that we continue to support our unique and diverse culture, which includes welcoming new faces and ensuring they feel just as supported and welcomed as their more established colleagues.**

threat to the wellbeing of any other person to their appropriate manager.

In keeping with the standards expected of the Group, employees must not attend the office while under the influence of alcohol, illegal drugs or other substances that could compromise safety or performance. Failure to observe these requirements will be dealt with as a disciplinary matter in accordance with the disciplinary procedures.





# Our People

## Diversity, Equity, Inclusion & Belonging

At the date of this Code, Keywords is comprised of a team of ~13,000 employees spread over 75+ studios serving a global games community.

Diversity is a key feature of our identity, and we are committed to building a more diverse and inclusive Group, with equitable practices and processes, where our people can feel proud to belong.

We are passionate about our role in the industry and committed to excelling in this competitive environment. The Group is committed to providing all employees with an environment free from bullying and harassment.

We operate on a basis of mutual respect, and we strongly promote equal opportunities for all our employees. No job applicant or current employee is discriminated against for reason of their age, race, religious belief, gender, marital

status, family status, sexual orientation, disability or membership of any ethnic community.



## The Group endeavours to ensure that:

- ✓ Criteria in selection, promotion, development and appraisal will be based on the person's merit and their ability to accomplish the work.
- ✓ The working environment is free from any harassment and intimidation of any kind, including sexual or racial harassment.
- ✓ All employees are treated fairly.
- ✓ All conditions of employment and job requirements will reflect our commitment to an equal opportunities policy.
- ✓ All staff involved in the recruitment process will be made aware of applicable equal opportunities legislation and of Keywords' commitment to its requirements.

# Our People

## Grievance Process

In any company, employees may have problems or concerns about their work, working conditions or working relationships. It is in everyone's best interest to ensure that these problems and concerns are not allowed to fester and develop into major problems address these promptly to prevent them from escalating into significant challenges. The [Keywords Grievance Policy & Procedure](#) provides a mechanism for dealing with problems and concerns as quickly and as fairly as possible and at every level throughout the Group.

## Personal information

Personnel records are maintained for all Keywords employees. Personal information obtained by the Group and held in an employee's personnel record is held in confidence. The Group is collecting the information provided as part of your employment and it will be processed in accordance with the

applicable data protection legislation.

This framework is constantly updated to take into account other applicable privacy regulations, and it applies to all of its subsidiaries regardless of geographical location or service line.

We regard the lawful and correct processing of personal information by the company as essential to successful operations and for maintaining confidence between our clients and ourselves. We therefore make every effort to ensure that personal information is treated lawfully and correctly.

Keywords needs to collect a range of information about its clients and agencies. This information is provided upon establishment of the business relationship and is updated as necessary throughout the duration of the business relationship.

### Find out more

For any queries regarding the processing of personal data contact

[privacy@keywordsstudios.com](mailto:privacy@keywordsstudios.com)

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# Our Business Ethics

## Anti-bribery & Corruption

Keywords is committed to the highest standards of ethical conduct and integrity in its business activities throughout the world, and will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.

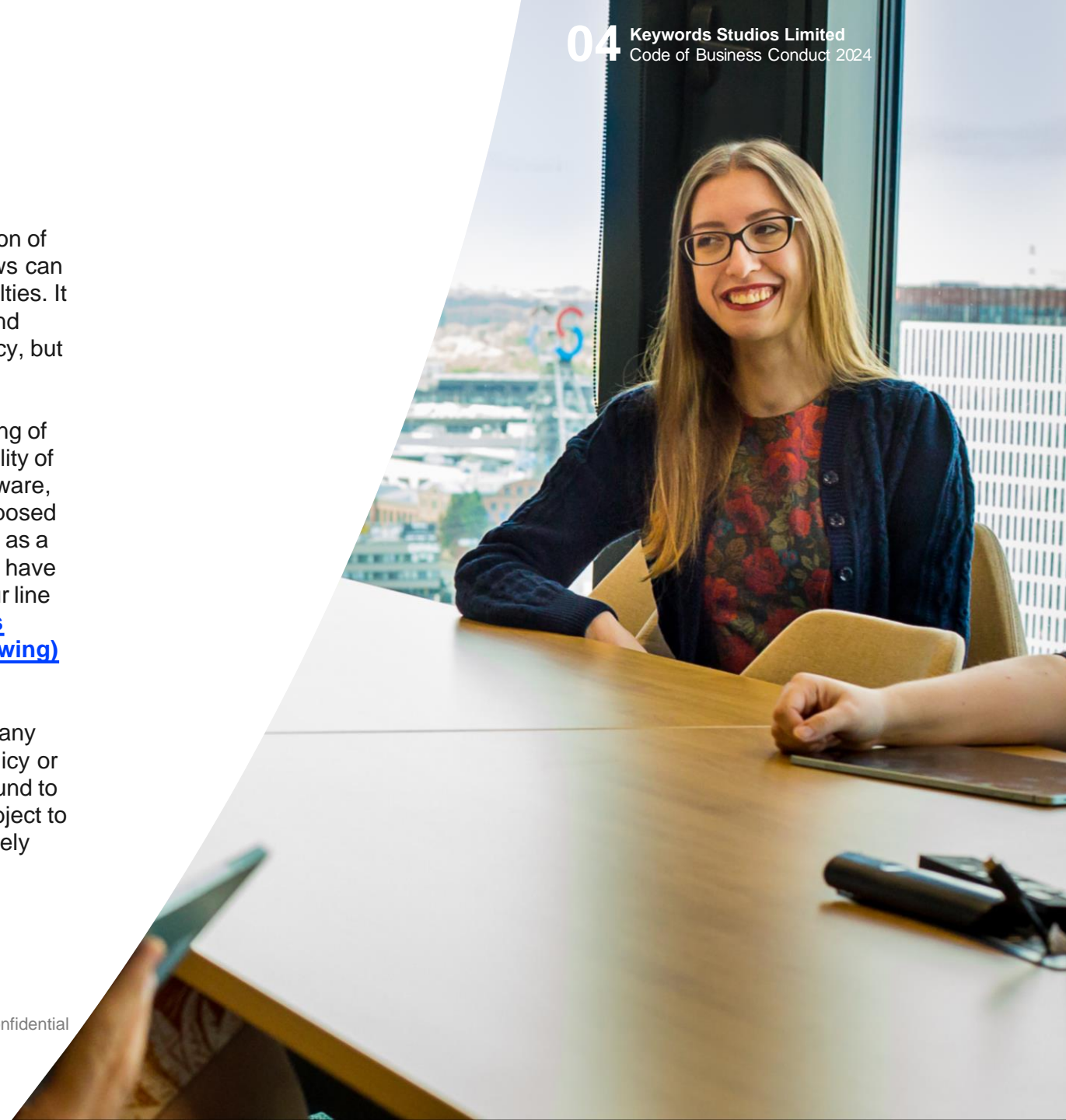
The prevention, detection and reporting of bribery or corruption is the responsibility of all employees. Senior Management is committed to implementing effective measures to prevent, monitor and eliminate the risk of bribery or corruption as a result of any management or business practices, as described in more detail in our [Anti-Bribery and Corruption Policy](#).

Keywords will abide by all applicable anti-bribery laws, including the Irish Criminal Justice (Corruption Offences) Act 2018, U.S. Foreign Corrupt Practices Act of 1977, the U.K. Bribery Act 2010, and the applicable local laws in every country in

which we carry on business. A violation of anti-bribery and/ or anti-corruption laws can lead to severe civil and criminal penalties. It is vital that we not only understand and appreciate the importance of this policy, but also comply with it in our daily work.

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees. If any of us become aware, or suspect, that an activity that is proposed or has taken place could be regarded as a bribe or corrupt, then we, individually, have a duty to immediately report this to our line manager or make use of the [Group's Protected Disclosures \(Whistleblowing\) Policy](#).

Keywords will investigate thoroughly any actual or suspected breach of this policy or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action, which may ultimately result in their dismissal.





# Our Business Ethics

## Competition & International Trade

### Competition and Antitrust

Everyone benefits from a free and fair competitive market. Keywords conducts fair and lawful business practices in all countries where we operate. We compete fairly to win contracts on the quality of our service offering, and we do not engage in conduct that gives rise to unfair competition.

In compliance with local laws prohibiting anti-competitive behaviours, we do not engage in activity that might restrict competition or the market such as price fixing, market sharing or bid rigging with competitors. Market information is collected appropriately through public communications and filings, industry surveys and appropriate interaction with customers and competitors.

### International Trade

Keywords complies with applicable trade control laws and regulations, including

import and export control laws. Export controls govern many types of exchanges of information across national borders, including email transmissions and web access to servers.

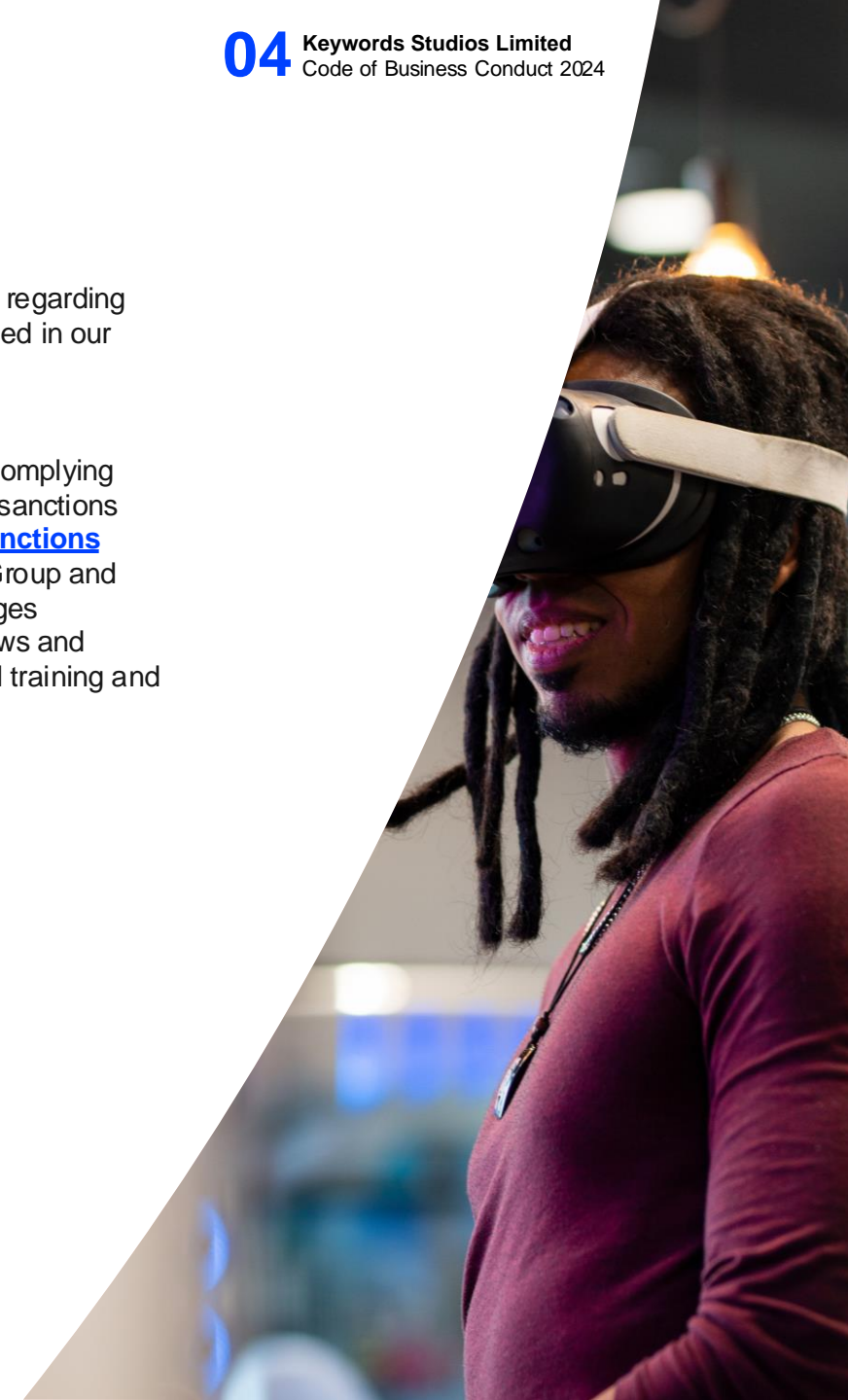
The Group takes a balanced approach to the management of its tax affairs and our approach to manage tax issues is to ensure that:

- We comply with all applicable laws, disclosure requirements and regulations in the territories in which we do business;
- All tax positions adopted are adequately and fairly disclosed in tax filings;
- We have an open and transparent working relationship with relevant tax authorities around the world and where disputes arise with tax authorities, we seek to reach a resolution as soon as possible in an open and constructive manner.

Common rules and guidance regarding international taxation is outlined in our [Anti-tax evasion Policy](#).

### Sanctions

Keywords are committed to complying with the economic and trade sanctions laws and regulations. Our [Sanctions Policy](#) applies to the entire Group and Keywords pro-actively manages compliance with sanctions laws and regulations, including internal training and customer screening.



# Our Business Ethics

## Accurate Books & Records

In accordance with the Alternative Investment Market (AIM) Rules for Companies published by the London Stock Exchange, together with applicable accounting and ESG principles and standards, it is essential that the Group records and reports all information relevant to its business accurately and honestly. This includes our annual report, monthly management accounts, sales figures, contracts and personal expense claims, as well as non-financial information such as health and safety.

The Group's financial records are relied upon by management, directors, investors and the public to make informed decisions about our business and may also be provided to regulatory and government authorities.

We must comply with all applicable laws, regulations and accounting standards and ensure the financial information we produce provides a true and fair view of

our business, is balanced and understandable, and is not in any way misleading.

All Keywords employees have a role in making sure that Keywords' money is appropriately spent, our financial records are complete and accurate, and internal controls are honoured. This matters every time we hire a vendor, expense something, enter a timesheet, sign a new business contract or enter into deals on the Group's behalf.

Our [Signatory Authority Policy](#) sets out our approach to managing authority to sign contracts or any other engagement on the behalf of any entity within the Group.



# Our Business Ethics

## Client Confidentiality & Intellectual Property (IP)

We are fortunate to be able to count most of the top global games and entertainment companies as our customers. These companies expect the highest level of service and confidentiality. At the heart of our culture is our commitment to quality, reliability and integrating with our clients' processes promoting long-term customer relationships.

Our business is the provision of professional services to our clients. In all cases, the protection of our clients' IP and confidential information is paramount. For these reasons, we have a number of security measures in place. Most importantly, however, every Keywords employee is expected to reciprocate the trust the Group and our clients place in us as individuals by not discussing the projects they work on with anyone outside of the project team, in accordance with the non-disclosure agreement which they have signed with Keywords.

### Find out more

To get more information on Keywords' Information Security policies and framework, contact the Global Information Security team at

[infosec@keywordsstudios.com](mailto:infosec@keywordsstudios.com)



## Information security

Having a secure environment is critical to allow Keywords to operate and grow efficiently. All Keywords employees and teams have a responsibility to ensure that Keywords systems and information stays secure, by taking the following steps:

- ✓ Protect your work-related accounts and passwords, keep your security cards safe, and never allow unauthorized people to use or access them.
- ✓ Whenever you leave your computer unattended, make sure to lock your system. You are responsible for activities performed under that identity.
- ✓ Be mindful when receiving emails or phone calls, question the authenticity of requests. Fraudsters are using these mediums heavily nowadays. When unsure, contact your local Information Technology team.
- ✓ Ensure company security controls (like anti-virus, firewalls, etc) are effective and that equipment is up to date with the latest security patches. Modification of controls to reduce security is not allowed. Report any anomaly quickly.

**Timely and accurate reporting is key to preventing lasting damage to the Group. Any suspected security incidents should be reported to your helpdesk, who will route the information to the security team.**



# Our Business Ethics

## Companies joining Keywords (Acquisitions)

We are a highly acquisitive business and apply strict financial and non-financial criteria when evaluating acquisition targets, including reviewing ESG areas such as DEIB, environmental initiatives, and their culture.

Before acquiring a new studio, we conduct a thorough due diligence process and prepare a detailed acquisition report to support decision-making. We implement a comprehensive integration process post-acquisition, formalised by an agreed integration plan tailored to the relevant business. This plan is designed to ensure the seamless integration of the new studio, with a particular focus on fostering a sense of belonging among its staff from day one, with a view to making them an integral part of Keywords.



# Our Impact

## Environmental Statement

Keywords is committed to minimising its impact on the environment. The video-game industry has a relatively low carbon footprint compared to other “harder to abate” sectors. Our largest considerations are our energy consumption and business travel. Sustainability is a core focus for Keywords, as it is for all of our studios across all our territories.

Keywords has taken steps to address its climate impact by extending the activities of its Sustainable Studios programme, with studios encouraged to minimise energy usage, reduce and recycle waste, and to use the most efficient communication and collaboration tools to eliminate unnecessary travel.

## Communities / Charity Involvement

We encourage community involvement and supporting good causes throughout our local studios. We want to do more to support good causes through our Keywords Cares program by matching funds raised for community outreach and charitable initiatives by our local teams around the world.

Areas where we can have a positive impact include our work environments, our wellbeing, game industry non-profit programmes, educational initiatives and community outreach.

Our [Charitable Giving Policy](#) aims to focus on causes aligned with our business that will help build partnerships at a local level and create a strong sense of community spirit. Individuals and studios across the Group are

empowered to take action by charitable giving or sponsorship to have direct and positive impact on our local communities as well as the global gaming community.

## Political Engagement

To avoid the appearance of impropriety or to prevent conflicts of interest, we do not make corporate political contributions (both monetary and in-kind) to political candidates, political parties or party committees on behalf of Keywords.

There is a place for proper lobbying where the intention is to openly convey the Group’s views and concerns to policymakers. Where such activity takes place, it is in accordance with local laws and regulations, and only conducted by designated personnel authorised to represent the Group.

We participate in local industry associations where appropriate to our business. Membership is transparent, meetings are minuted, and no company or customer sensitive information is discussed. Participation in local industry associations might involve Board membership.

Employees are encouraged to maintain professionalism and respect for diverse perspectives, including political beliefs. While engaging in political discourse, whether within the workplace or external forums, employees are expected to uphold the values of civility, tolerance, and inclusivity. When expressing political views, employees must make it clear that their views are their own and not those of the Group.





# Our Impact

## Human Rights & Prevention of Modern Slavery

At Keywords, we do not tolerate any form of modern slavery or human trafficking in any part of our business. We operate to international standards and principles including the International Bill of Human Rights, the UN's Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the Children's Rights and Business Principles.

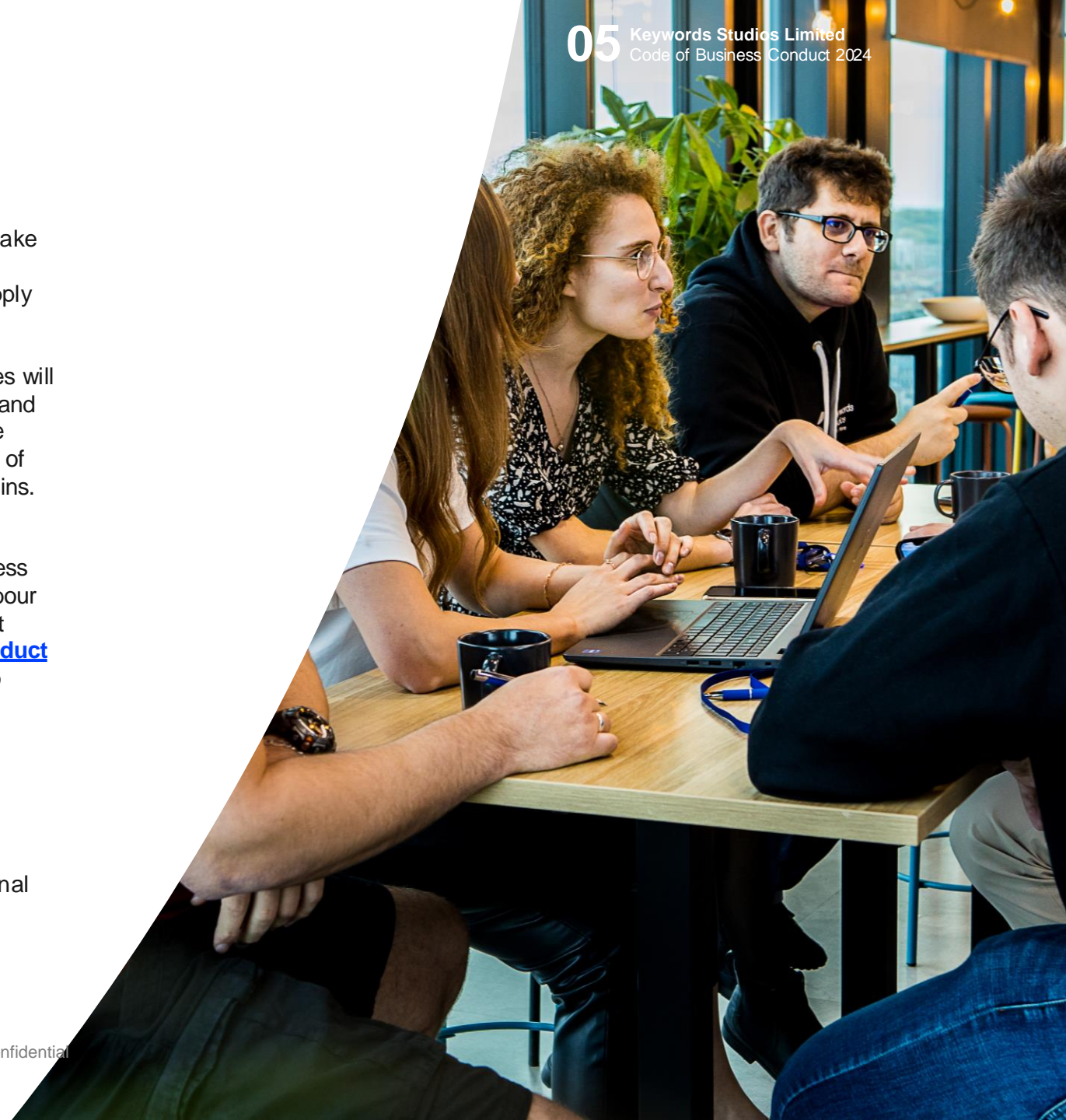
Keywords acknowledges this global responsibility and is committed to driving out acts of modern slavery and human trafficking from within its own business and supply chains. Keywords acknowledges its responsibility under applicable modern slavery legislation and will strive for transparency within the organisation to ensure consistent awareness of that legislation.

As outlined on our Prevention of [Modern](#)

[Slavery Statement](#), Keywords will make reasonable endeavours to ensure all employees and agents within our supply chains are not subject to any form of forced, compulsory/bonded labour or human trafficking. Adequate resources will be made available to ensure slavery and human trafficking are not taking place within our organisation or, to the best of our knowledge, within our supply chains.

As part of our due diligence efforts to identify and mitigate risk, we will assess our supply chains and our agency labour providers. An approved supplier must adhere to the [Supplier Code of Conduct](#) provisions while providing services to Keywords Studios, which cover:

- Forced involuntary labour;
- Document retention;
- Humane treatment;
- Workers equality;
- Freedom of movement and personal freedoms; and
- Works hours and wages.





# Our Impact



## Responsible gaming

Offering a safe and positive gaming environment is a priority for the video games industry, which includes safeguarding and supporting vulnerable players, preventing toxic behaviours in online communities, safeguarding minors and their families, mitigating problem gaming and protecting personal data.

## Safe and Pleasant Gaming

In our Player Engagement service line, for example, among the services offered to our clients, we include the following solutions to help guarantee a safe and pleasant environment:

- ✓ Mandatory GDPR and California Consumer Protection Act (CCPA) training for employees to ensure proper handling of personal information in all circumstances and assist players with their privacy-related requests;
- ✓ Monitoring and moderation of online communities, by a combination of technology and employees familiar with the game and its player base, to prevent toxic behaviour and report misconduct;
- ✓ Enforcement of Children's Online Privacy Protection rule (COPPA) guidelines for titles aimed towards minors under the age of 13;
- ✓ Handling of real-life threats/emergency situations by an experienced team ready to respond 24/7 and able to report to local authorities when necessary; and
- ✓ Moderate user generated content, removing offensive materials.



# Our Organisation

## Company Assets

Keywords' company assets are provided for business use and we must guard against waste and abuse. Assets include the studios we work in, the brand we represent, the technology that connects us, the ideas we exchange, the intellectual property we work on and the devices we use to do our jobs.

Group devices such as laptops and mobile phones remain the property of Keywords. The Group reserves the right to monitor messages and data to ensure its business purpose. Acceptable use guidance in relation to email and company devices can be found in the [General Information Security Policy](#).

In general, outbound communications must reflect well on Keywords' reputation and public image. Profanities, obscenities, derogatory remarks should not be used, and may create legal problems. Likewise, in keeping with our dignity at work policy,

inflammatory, defamatory, harassing, disruptive communications, spamming or hostile and intimidating exchanges are prohibited.

With the exception of material clearly owned by third parties, including by our clients, Keywords is the legal owner of all business information stored on or passing through its systems.





# Our Organisation

## Technology & Social Media

Keywords is operating in an industry that is not only fast growing but also a leading technological innovator in interactive technology. The global market for video games is fast moving and continually evolving. New gaming platforms, genres, monetisation models, distribution channels, and audiences keep coming. Not only this, but all manner of content providers are seeking to make their content more impactful and engaging. The emergence of AI as a potential creative collaborator and performance enhancer is another example of how the industry will evolve over time to utilise the latest in technologies.

With a team of over 13,000 talented individuals and existing AI products, we are continually exploring and assessing the emerging practical applications of AI that can enhance workflows for our clients and our teams. Our approach, however, is

grounded in ensuring the safe and responsible use of AI over speed. We understand the importance of going at a pace that suits our customers. We maintain strict guardrails to maintain openness, transparency, and security ensuring the protection of intellectual property, and confidential information at all times. The rapid evolution of AI signifies that we are just at the beginning of a long-term transformation, and we are fully prepared to support our clients throughout this journey.

### Social Media Policy

Employees represent Keywords as well as themselves when using social media. Therefore, it is important to ensure that social networking profiles and all content and information published or shared is appropriate and consistent with how an employee wishes to present themselves in their professional career. All employees are prohibited from publishing information on any social media sites where such information could negatively affect Keywords, its employees or clients. Never

post confidential information about Keywords or its clients online.

Employees should communicate responsibly and adhere to the local regulations and policies related to social media usage. Failure to adhere to those will be dealt with in line with Keywords' disciplinary procedures.

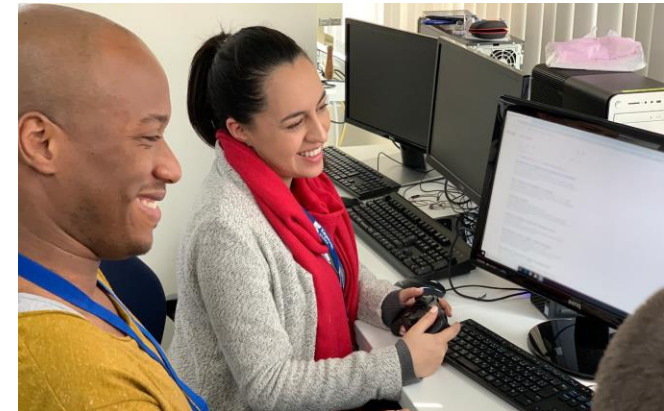
It is the responsibility of the employee to exercise restraint and ensure that online activities do not interfere with their job performance.

### Community Management

At times we may take on the role of representing our clients on social media to support live operations or community management. We become integral members of these communities and echo the voice of our audience, actively participating in discussions. Our aim is to generate respect and trust by sharing valuable insights and engaging content. We enjoy being silly, if our audience loves silly and we appreciate being formal if our

audience prefers formal, as long as our gamer souls can shine through.

Our tone is down to earth, relatable and conversational. We do not treat Social Media accounts like a marketing megaphone and we avoid using them purely for marketing goals. Our focus is on our audience. We strive to share what they love. We always reply. Fast. Honest. Transparent.





# Our Organisation

## Fraud & Anti-Money Laundering

Keywords does not tolerate fraud or theft and requires all Keywords employees (and third parties with commercial/business relationships) to demonstrate high standards of honesty and integrity in their work at, or on behalf of, Group companies consistent with the legal and ethical standards in this Code.

Studio management is required to establish and maintain sufficient controls to ensure that potential fraud and theft risks are properly identified, monitored and mitigated. Keywords requires all actual, suspected or attempted fraud and/or theft to be reported as outlined in the [Anti-Fraud & Theft Policy](#).

Money laundering is the illegal process of concealing the origins of illegally obtained money by passing it through a sequence of transfers to make the funds appear legitimate.

Keywords does not engage or assist in any money laundering or illegal financing activities. We escalate any potential suspicious transactions in an appropriate manner and report activity to the relevant authorities where appropriate. Keywords must be vigilant in how funds are received or sent. Keywords has a responsibility to transact only with legitimate business partners.



# Our Organisation

## External Communication

Keywords makes every effort to communicate regularly with investors via announcements and face-to-face contact. As a publicly listed company, we must ensure that price-sensitive information is released to the stock market before being released to any other party.

It is also important to protect our reputation by being consistent and accurate in our communications to the public and other stakeholders. Only the CEO, CFO, COO and Director of Investor Relations, or those other employees specifically authorised to do so, may contact or respond to enquiries from investors and analysts, the media, the public or government/ regulatory bodies.

All communications (to the media) in relation to our financial performance, acquisitions, major new contracts or strategic plans which could have a

reputational impact on the Group will be handled exclusively by the CEO, CFO, COO, Director of Investor Relations and any appointed external PR agency.

### Find out more

Enquiries from investors and the media should be sent to

[investors@keywordsstudios.com](mailto:investors@keywordsstudios.com)





# Personal Integrity

## Conflicts of Interest

Doing the right thing for Keywords is important. This means avoiding situations that create – or appear to create – a conflict between your personal interest and Keywords' interest. Every decision we make while at work must be objective and with Keywords' interest in mind.

Before acting on the Group's behalf, we must recognise and avoid potential conflicts of interest, where a personal interest may interfere with the business decision. Even the appearance of a conflict can damage the Group's reputation.

Outside interests should be disclosed to your manager, such as any decision involving family members or close friends, any business relationship you have with Keywords, and/ or any interests in competitors or business partners of Keywords. Where outside interests represent a potential conflict, then before any related action is taken, approval

should be sought from your line manager, General Counsel or CFO and any recommendations or restrictions should be followed.

## Share Dealing & Insider Trading

Keywords' securities/ shares were listed on the AIM of the London Stock Exchange in July 2013 and, as a listed company, the Group and its employees, directors and shareholders are subject to the UK Market Abuse Regulations (EU Market Abuse Regulation 596/2014, as retained in UK law pursuant to the European Union (Withdrawal) Act 2018, as amended), the AIM Rules for Companies and the Keywords' Share Dealing Code and Share Dealing Rules.

During the course of our work, we may become "insiders" as we encounter inside information that could affect Keywords and/ or its share price. Special rules apply to people in this position, and we must not use non-public, price-sensitive information

for personal financial benefit, at any time. Additional trading restrictions apply in periods leading up to an announcement of Keywords' results.

Any person who is required to comply with the Share Dealing Code and the Share Dealing Rules shall be notified by the CFO, General Counsel, or another person on their behalf, and shall be required to acknowledge their understanding and compliance with the Keywords' [Share Dealing Code](#). Consent in accordance with the Share Dealing Code is required before anyone on Keywords' insider list may deal in Keywords' securities (or securities of any other company in relation to which they possess inside information, such as a trading partner or acquisition target). Inside information should not be passed to any other person, inside or outside the Group. Similar restrictions apply to persons closely associated with those on the Keywords' insider list.

## Find out more

Enquiries about trading Keywords shares or inside information should be sent to:

[cosec@keywordsstudios.com](mailto:cosec@keywordsstudios.com)

# Personal Integrity

## Gifts & Hospitality

Keywords will provide per diem sums to cover expenses or will reimburse expenses incurred for all approved travelling, hotel and other business related expenses wholly, exclusively and necessarily incurred in relation to the performance of your duties.

Gifts, entertainment and hospitality are only acceptable where they are appropriate, proportionate, are properly recorded and provided they have been approved by the appropriate level of Keywords management. Excessive gifts, entertainment and hospitality can be used to exert improper influence on decision makers.

The acceptance of gifts or favours from clients lays the recipient open to an allegation that they have been placed under a sense of obligation and that in consequence their impartiality is impaired. In principle, therefore, unless such gifts or favours are trivial or are

generally available to others, they must not be accepted without prior approval from your manager.

Further guidance is in the [Anti-Bribery & Corruption Policy](#).





# Summary of Policies and Key Contacts

Key Policies	Key Contacts	Page References	
Protected Disclosures (Whistleblowing) Policy	Protected Disclosure Manager – Joe Binnion <a href="mailto:jbinnion@keywordsstudios.com">jbinnion@keywordsstudios.com</a> +44 7806 360338 Keywords Studios, 4th Floor 110 High Holborn, London, WC1V 6JS, England	Introduction	7
	General Counsel – Andrew Kennedy <a href="mailto:akennedy@keywordsstudios.com">akennedy@keywordsstudios.com</a> +353 86 701 3665 Keywords Studios, Whelan House, South County Business Park, Leopardstown, Dublin 18, D18 T9P8, Ireland	Introduction	7
Grievance Policy	Line manager and/or local HR manager	Our People	10
Data Protection Policy	<a href="mailto:privacy@keywordsstudios.com">privacy@keywordsstudios.com</a>	Our People	10
Anti-Bribery & Corruption Policy including: • Gifts & Hospitality	Line manager or CEO	Our Business Ethics Personal Integrity	11 23
Anti-tax Evasion Policy	<a href="mailto:legal@keywordsstudios.com">legal@keywordsstudios.com</a>	Our Business Ethics	12
Prevention of Modern Slavery Statement	Department line manager or HR Director	Our Impact	17
Supplier Code of Conduct	<a href="mailto:legal@keywordsstudios.com">legal@keywordsstudios.com</a>	Our Impact	17
Share Dealing Code	<a href="mailto:cosec@keywordsstudios.com">cosec@keywordsstudios.com</a>	Personal Integrity	24
Sanctions Policy	<a href="mailto:legal@keywordsstudios.com">legal@keywordsstudios.com</a>	Competition & International Trade	12
Signatory Authority Policy	<a href="mailto:cosec@keywordsstudios.com">cosec@keywordsstudios.com</a>	Our Business Ethics	13
Charitable Giving Policy	Local HR manager	Our Impact	16

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