

The Way We Work

Unity's Global Code of Conduct and Ethics

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Overview

The way we conduct ourselves is built around the recognition that everything we do in connection with our work at Unity will be, and should be, measured against the highest possible standards of ethics and business conduct.

The Way We Work, Unity's Global Code of Conduct and Ethics (the "Code"), provides an overview of the legal standards that we must adhere to while representing Unity. The Code is intended to help everyone at Unity make the right decisions while promoting a positive, fair, inclusive, non-discriminatory, safe, and compliant workplace culture. Many of these standards may also be legal requirements, but they are ultimately the right thing to do.

All employees and members of Unity's Board of Directors, in all locations, are required to follow the terms of the Code. Similarly, we expect our contractors, temporary workers, vendors, suppliers, and partners to adhere to these principles. If you are unsure of whether something is permitted by law or the Code, you should seek advice from your manager, HR, or Legal Compliance.

Your responsibilities under the Code are not limited to the workplace. You are expected to uphold these principles anytime you are acting in your capacity as a Unity employee, attending an official or unofficial Unity event, representing Unity, or doing business with Unity or on Unity's behalf.

Failure to adhere to the terms of the Code is to fail in our culture and may result in disciplinary action, up to and including termination of contract or employment.

Unity is committed to complying with laws, rules, and regulations everywhere we do business, and our success depends upon each employee operating within the legal guidelines and cooperating with local, national, and international authorities. We expect employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. Violation of domestic or foreign laws, rules, and regulations may subject an individual, as well as Unity, to civil and/or criminal penalties. Further, no provisions in the Code are intended to conflict with any laws. In the event of a conflict, the applicable law will prevail.

A Respectful and Inclusive Workplace

Equal Opportunity

Unity brings together the best people from around the globe to enable creators. At Unity, we believe having a team with a wide range of backgrounds, cultures and perspectives makes us a stronger company and is better for our business. We make a concerted effort to ensure that all Unity employees and employment applicants are treated fairly, and we prohibit any employment decision from being made on the basis of a protected characteristic, such as gender or race.

Harassment, Discrimination, and Bullying

We believe that people need to feel safe and respected in the workplace. To maintain our respectful workplace, we do not tolerate harassment of, or discrimination against, any employee, applicant, or contractor because of race, color, religion, national origin, sex, gender, gender identity and/or expression, genetic predisposition or carrier status, ancestry, age, physical or mental disability, medical condition, marital status, parental status, registered domestic partnership status, military or veteran status, sexual orientation, citizenship status, victim of domestic violence status, or any other status protected by applicable laws.

Harassment can take many forms, including verbal or written statements, derogatory comments, inappropriate jokes or language, bullying, physical conduct, or unwanted sexual advances. Harassment can occur through a series of repetitive actions or from a single isolated event.

Bullying – which is treatment of another that is unwelcome and reasonably viewed as offensive, hostile, or intimidating – is also strictly prohibited, regardless of whether it is based on a protected characteristic.

This policy may protect more categories of people than some local jurisdictions require, but we will not let that stop us from making the easy, ethical choice to protect our workforce. Anyone found in violation of this policy will be subject to disciplinary action, up to and including termination.

If you are aware of any instance of harassment, discrimination, or bullying, you should report it immediately to a manager, your Human Resources Business Partner (HRBP), [Employee Relations](#), [Legal Compliance](#), or anonymously to EthicsPoint, our third-party hotline that can be reached at 1-855-754-3236 (additional localized phone numbers are available at www.unity3d.ethicspoint.com). If you are a manager and receive a

complaint, you are required to promptly report it to an HRBP, [Employee Relations](#), or [Legal Compliance](#).

For more details, please review Unity's [Anti-Harassment and Anti-Discrimination Policy](#).

Workplace Violence Prevention

Everyone at Unity should feel safe at work. Threatening, intimidating, or conducting any act of violence against an employee, contractor, vendor, or anyone else at Unity is strictly prohibited.

Employees may not possess or use any weapon at any time while on a property owned, leased, or controlled by Unity, or anywhere that Unity business is conducted, such as customer locations, client locations, trade shows, restaurants, and company event venues. This prohibition applies regardless of whether an employee possesses a concealed weapons permit. Weapons include but are not limited to guns and knives.

If you are faced with or threatened with immediate danger, we encourage you to remove yourself from the situation as safely as possible and contact the local authorities immediately.

Reports of suspected workplace violence incidents or any circumstances that raise concern for safety from violence may be reported to Unity's [Virtual Security Operations Centre](#). Direct questions or concerns related to workplace violence prevention to the [Physical Security Team](#). Use the [EthicsPoint hotline](#) should you wish to report an incident or raise a concern anonymously.

Please read Unity's [Workplace Violence Prevention Plan](#) and visit the [Physical Security Confluence page](#) for more information on security at Unity.

Drugs and Alcohol

We believe that the influence of recreational drugs and/or excessive consumption of alcohol at work can deteriorate our goal of providing a safe workplace.

Accordingly, Unity strictly prohibits the use, possession, or distribution of any recreational drugs or misuse or illegal distribution of a prescription medication; and the excessive consumption of alcohol at any Unity workplace, company event, or in any other location where you serve as a Unity representative. Employees should not report to work when they are unfit to do so due to the consumption of alcohol or recreational drugs. This policy on drugs and alcohol will be strictly enforced, with violations incurring employment actions up to and potentially including termination. To be clear, being under

the influence of drugs or alcohol does not remove or reduce your obligation to adhere to the Code of Conduct in its entirety or to your obligations as a Unity employee.

Additionally, Unity has certain expectations and regulations regarding employees' use of Unity offices for social activities. Employees should refer to Unity's [Office Usage Policy](#) for more information.

Avoiding Conflicts of Interest

Conflicts of Interest

A conflict of interest occurs when Unity believes that your outside activities interfere with your individual position, your decision-making ability at Unity, Unity's overall interests (e.g., including activities that are competitive to Unity's current or reasonably foreseeable future interests), or creates the appearance of such a conflict. Your decisions and actions related to Unity should be based on the best interests of Unity and not based on personal relationships or benefits, either for yourself or for others. Unity personnel must never use or attempt to use their position with Unity to obtain improper personal benefits.

Unity's Policy and Disclosure Process: Unity's policy is that conflicts of interest are prohibited. If you identify a situation that is or might be a conflict, you are required to disclose it. Unity has a formal process for submission and review of potential conflicts of interest. For all potential conflicts, Unity personnel are required to submit a [Conflict of Interest Disclosure](#). All potential conflicts must be reviewed through this formal channel to ensure appropriate review of the facts by the right people at Unity. Disclosing a potential conflict to your manager or other company managers does **not** remove your obligation to submit a [Disclosure](#). Do not proceed with the activity disclosed until you have been notified that the disclosure review has concluded and that you may proceed. Also, please note that stipulations may be attached to any approved outside activity.

Because it is not always clear what constitutes a conflict of interest, if you are unsure whether something is a potential conflict of interest, or are concerned that a conflict might develop, please submit a Disclosure before engaging in that activity.

Failing to disclose an actual or potential conflict of interest is a violation of the Code.

A conflict of interest may arise in many situations. While we cannot list them all in this Code, some common potential conflicts are listed below:

- **Outside Employment:** Some employees own their own business, work a second job, or freelance occasionally. Generally speaking, outside employment is allowed as long as (1) the time commitments do not impact your responsibilities at Unity, (2) your outside employer or services are not competitive with Unity's current or reasonable future interests, and (3) you are not using any of Unity's confidential information, intellectual property, resources, or equipment without express permission.
- **Board of Director Membership:** Being a member of a board is an important responsibility, where you are expected to do what is best for the company on

whose board you sit. Various factors, including compensation for board service, may be considered as part of the conflicts review.

- **Games and Creative Software:** Unity supports and encourages employees who create games or other interactive content in their spare time and, generally, doing so does not need to be disclosed for a conflict of interest review. However, if your job at Unity is to make games, creative software or content using Unity's products or services, then creating such games, software, or content outside of work is something that must be disclosed for review as well.
- **Ownership Stake:** Unity personnel are required to disclose any ownership stake in a company that is one of Unity's vendors, customers, partners, agencies, or competitors, if the investment is *more than* 1% of the total outstanding class of securities/capital value of the company on a fully diluted basis. Note, *passive* investment interests, where your interest is *less than* 1% of the outstanding securities/capital value of the entity, do not need to be disclosed for a conflict of interest review. A passive investment is a purely financial involvement in an organization for which you perform no managerial functions, provide no advice, and have no ability to influence the organization's policies, products, or business. Passive investments include ownership of shares in a public or private company, whether held individually, in a 401K plan, or as an investment in a stock mutual fund or stock market index fund. Note that Unity Personnel are still required to comply with Unity's [Insider Trading Policy](#) - please refer to the [Insider Trading Policy](#) for details.
- **Close Personal/Financial Relationship** - Having a close personal or financial relationship – such as a friend, romantic partner, or family member – with someone who works for or is one of Unity's vendors, customers, or agencies.

For additional details, please see Unity's [Conflicts of Interest Policy](#).

Employees may not use any Unity confidential information or intellectual property in creating their games or other content.

Executive Officers and Directors: Officers and directors may seek authorizations and determinations from Unity's Board of Directors or the Nominating and Corporate Governance Committee of the Board. Unity also abides by the securities laws that govern conflicts of interest by our executive officers and directors. Related party transactions must be approved by Unity's Board of Directors or the Audit Committee of the Board as required by applicable laws and regulations.

Corporate Opportunities

You may not take personal advantage of opportunities for Unity that are presented to you or discovered by you as a result of your position with Unity or through your use of corporate property or information. Even opportunities that are acquired privately by you

may be questionable if they are related to Unity's existing or proposed lines of business. You may not compete with Unity in any way.

Coworker Relationships

We understand that romantic or sexual relationships between coworkers may occur, and such relationships are not prohibited per se. However, all romantic or sexual relationships between coworkers must be disclosed to your HRBP immediately so that Unity may take action to resolve any actual or perceived conflict of interest.

For example, Unity does not allow managers and subordinates in the same reporting line to be in a romantic or sexual relationship. In such a case, Unity will attempt to reassign one of the individuals or otherwise make changes to the reporting relationship to alleviate the potential concern. In some cases, Unity may determine that reassignment or role adjustment is either impractical or unlikely to eliminate the potential concern. If so, Unity will discuss options, including the possibility of one individual leaving Unity. If a romantic or sexual relationship between a manager and a subordinate should develop, it shall be the responsibility and mandatory obligation of the manager to promptly disclose the relationship to the HRBP. The subordinate may make the disclosure as well, but the burden of doing so shall be on the manager.

Further, even if there is no direct or indirect reporting relationship, employees contemplating or involved in a romantic or sexual relationship should be mindful about pursuing the relationship in a work setting. For example, if one employee indicates an interest in taking a relationship to a romantic level, and the other employee is not interested, the employee should not pursue a romantic relationship further. Two employees in a romantic relationship should also remain professional at work. And employees in a romantic relationship should not use company-provided devices or email to communicate in a sexual or otherwise inappropriate manner.

For Unity to effectively address any potential issues that such relationships may have on the working environment, any employee who believes that they have been adversely affected by such a relationship should report the concern to an HRBP, [Employee Relations](#), or [Legal Compliance](#). Alternatively, you can contact our EthicsPoint hotline by calling 1-855-754-3236 (additional localized phone numbers are available at www.unity3d.ethicspoint.com) or filing a report online at www.unity3d.ethicspoint.com.

Business Gifts, Entertainment, and Other Amenities

In the course of any business, it is often customary to give or receive gifts, or to host or attend business meals and entertainment, from a customer, vendor, partner, or client. This section explains Unity's requirements for doing so appropriately. Depending on the situation, you may also need to consult Unity's [Global Travel, Gifts, and Entertainment](#)

[Expense Policy](#) and/or Unity's [Anti-Corruption Policy](#), which contain pre-approval requirements.

It is imperative that giving or receiving gifts, meals, entertainment, or anything else of value never conflicts with or influences, or creates the appearance of influencing, anyone's decision-making in relation to Unity.

Gifts

A gift includes any item of value — such as an object, gift certificate, or free services — but does not include entertainment attended by the person giving it (see Meals & Entertainment below).

Generally, gifts should be modest. Small company swag, fruit baskets, or sweets are good examples of appropriate gifts. When giving gifts, the aggregate value to any individual person should not exceed US\$100 annually without first obtaining permission from the [Legal Compliance](#) team. The value of gifts received from an individual, customer, or vendor should also not exceed an aggregate value of US\$100 annually. Cash and anything that can easily be converted into cash, like gift cards or gift certificates, can never be given or accepted, regardless of amount.

Meals & Entertainment

Business meals and entertainment can be an appropriate part of Unity business relationships, provided they have a legitimate business purpose and are not excessive or intended to improperly influence a business decision. If you are taking a client, customer, vendor, or business partner to a meal, event, or other hospitality for a business purpose, refer to Unity's [Global Travel, Gifts, and Entertainment Expense Policy](#).

Accepting gifts, entertainment and other business courtesies from a competitor, customer, vendor or business partner can create the appearance of a conflict of interest, especially if the item is lavish. Generally, acceptance of inexpensive “token”, non-cash gifts (e.g., logoed water bottle, calendar) is permissible. In addition, infrequent and moderate business meals and entertainment with outside companies can be appropriate aspects of many Unity business relationships, provided they have a legitimate business purpose and aren't excessive or intended to improperly influence a business decision. If you are asked to attend a meal, entertainment, or other hospitality event, the client, customer, vendor, or business partner providing it must also be present at the event — otherwise, it will be treated as a gift.

Business-related event attendance. Free tickets to sporting events or other entertainment where attendance is directly related to your job function and part of legitimate Unity business are not considered a gift under this policy. Work with your manager to determine whether attendance is directly related to your role; for high-value or high-profile events, review your attendance with both your manager and your vice

president. Employees should never use relationships built through Unity business for personal advantage — such as obtaining hard-to-access tickets — since that is preferential treatment and could itself be a conflict of interest.

Government Officials

Additional requirements apply to gifts, meals, and entertainment involving government officials or employees of state-owned or state-controlled companies, as even small gifts can be prohibited or restricted by law and can result in severe penalties to Unity and to the individual involved. See Unity's [Anti-Corruption Policy](#) before providing anything of value to any such official or employee.

If you have questions about this policy, please contact your manager or the [Legal Compliance](#) team. If you are seeking an exception to this policy, please contact the [Legal Compliance](#) team.

Political Activity

Unity supports employees who choose to participate in a political process. However, any such participation must be done on an individual basis and on your own time. You may not use Unity's name, stationery, letterhead, logo, funds, assets, or resources to support politicians, political organizations, candidates, committees, or events in any way without the prior express written consent of the Chief Executive Officer or Chief Legal Officer.

Should you become involved with a political group, you must make it clear that your activities are being conducted in your personal capacity and not on Unity's behalf or at its request.

Unity's internal tools — including email, Slack, and other company platforms — should not be used to solicit colleagues for political contributions or to encourage participation in political activities. Even well-intentioned asks can feel uncomfortable in a workplace setting, and we want everyone to feel free from any pressure around political choices.

If you are uncertain if an action may constitute political activity covered by this section, please contact the [Legal Compliance](#) team.

Communicating Consistently and Respectfully

When issuing communications to the public, we believe in delivering one consistent message to our users and the marketplace. To do this, we must provide accurate statements in a thoughtful manner, from employees who have been authorized to speak on Unity's behalf. Failing to do so can cause confusion for our users as well as potentially having reputational and legal ramifications for Unity.

Media Requests

Due to Unity's public visibility, reporters or members of the media may reach out to employees inquiring about internal programs, news, or hearsay regarding Unity. Media can take the form of a newspaper reporter, technology media blog, podcast request, or even an interview with a YouTube influencer, and may come via your personal contact information such as personal email, mobile phone, or direct messages on social media platforms.

Only members of Unity's Communications team or those who have otherwise received prior authorization may make official statements on behalf of Unity. Please refer to Unity's [External Communications Policy](#) for full details.

If you receive a request from the media for an interview, to provide a comment or even be a background source, please contact Unity's Communications team at comms@unity3d.com. Remember that in all scenarios when speaking to the media, you are on the record and what you say could be used in print.

Conferences and Events

If you are asked to speak at an event, please notify your manager and the Communications team by submitting your request via the Communications [Intake Brief](#) for approval. At events where you are speaking in your individual capacity, instead of at the company's request or in your Unity role, you must make it clear that you are not representing the company, and you must ensure that you do not disclose any confidential or proprietary information. In some situations, the mere presence of a Unity employee speaking on a topic may cause others to draw reasonable inferences that business confidential information may be disclosed, so please seek approval before agreeing to accept a speaking engagement. Approval requests should be submitted at least one week before any deadline you may be under to confirm your participation in the event.

Social Media

With social media deeply integrated into most of our daily lives, it is important to remember that there are limits to what you can disclose and discuss about Unity on your personal social media accounts. Employees are prohibited from disclosing or commenting on confidential information or non-public information, including, intellectual property, trade secrets, certain legal matters, future product launches, dispositions and acquisitions, as they relate to Unity. Additionally, there are many non-confidential situations where you must disclose your affiliation with Unity and the independence of your statements. Prior to posting, please review Unity's [Social Media Policy](#) to understand how to remain compliant on social media.

Email, Zoom, Slack, and Other Electronic Communications

Communications through our various platforms, including but not limited to email, Zoom, and Slack, must be appropriate for the business context and respectful to its recipients. The requirements of the Code still apply when you are communicating electronically, so use common sense and good judgment when sending a message. For further information, please refer to Unity's [Internal Communications Policy](#).

Protecting and Using Our Assets

Confidential Information

Unity's confidential and proprietary information is any company-owned information that is not public, or which sets us apart from our competitors. Accordingly, you should never disclose such information to anyone without clear and explicit approval - this includes people within Unity who do not have a need to know such information.

Confidential information can take many forms, including non-public information regarding:

- Unity's research and development;
- Product releases or initiatives;
- Organizational details;
- Business strategies, marketing plans, or cost structures;
- The company's business results, financial position or finances;
- Business partner information that we have agreed to keep confidential through a non-disclosure agreement (NDA), including the identity of our business partners; or
- Unity's non-public intellectual property, including, but not limited to, planned trademarks, trade secrets, patent applications, designs, and business processes.

Similarly, it is imperative that you do not use or share any confidential or proprietary material from a former employer or violate any other confidentiality obligations of that employer. Not only is doing so against Unity's values of fair play, but it can also put Unity and you at legal risk.

For further details on the rules around the disclosure of confidential information, please see the terms of your employment agreement. You must also adhere to any customer or vendor-specific NDA that you may have signed as part of your role. For a general overview of NDAs, please review our educational materials [here](#).

Acceptable Use of Technology

Unity will provide you with the tools to perform in your role, which includes your Unity-provided laptop. These tools should only be used for business purposes, as all information created, stored, or transmitted using these tools, including emails and computer files, are considered to be Unity resources. To the extent permitted by local law, Unity may access, review, inspect, and monitor the contents of these resources at any time, without the employee's prior knowledge or consent. Additionally, the theft or misuse of Unity property and assets is strictly prohibited.

For further information on this subject and to understand the security requirements around your Unity-provided tools, please refer to Unity's [Security Acceptable Use Policy](#) and [Security Policy](#).

Unity supports the use of AI tools and has established an AI Acceptable Use Policy governing their use. Please refer to the policy for detailed guidance.

Keeping Our Business Practices Compliant

We must adhere to many global regulations in order to provide users with our products. We follow these guidelines not just because they are the law, but because they enable us to ethically perform at the highest level.

For a full list of Unity's Legal Compliance policies, please visit the [Legal Compliance Confluence page](#).

Fair Competition

Unity competes fairly in the marketplace and wins business based on the quality of our product and service offerings and our exceptional people. Unity relies on this reputation when dealing with competitors, customers, partners, and vendors. No employee or representative should endeavor to take unfair advantage of someone through misrepresentation or manipulation.

Further, in respect of antitrust and competition laws, Unity employees should never make a deal with a competitor around the terms of that competition. This includes deals around fixing or coordinating prices, and agreeing not to hire each other's employees, not to pursue specific customers or geographies, or any other coordinated action.

If you have any concerns or questions about competing fairly, please contact the [Legal Compliance](#) team.

Anti-Corruption

In accordance with fair competition, Unity does not engage in any form of bribery or corruption and prohibits employees and contractors from doing so on its behalf. Most countries have anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act (FCPA) or the U.K. Bribery Act, which contain broad prohibitions on bribery and corruption, including bribery of government officials and employees of state-owned enterprises. Unity's Anti-Corruption Policy not only prohibits these actions when dealing with government officials and employees of state-owned enterprises, but also prohibits commercial bribery to anyone.

As noted above under "Business Gifts, Entertainment, and Other Amenities" gifts, even small ones, can present particular issues when government officials and employees of state-owned enterprises are involved.

Under the anti-bribery laws, we also have a legal duty to maintain accurate books and records. Each of us is required to accurately and completely describe all expenditures, and we must never mischaracterize the nature or the amount of any expenditure, gift or other transaction.

For more information about bribery and anti-corruption, please see Unity's [Anti-Corruption Policy](#).

Business Records

It is essential to Unity's business that we keep and maintain full, fair, accurate, timely, and understandable business records. This requirement applies to all types of business records, including but not limited to expense reports, invoices, financial reports, personnel files, business plans, contracts, customer lists, and marketing information. Depending on its content, an email may be considered a business record. If you are unsure whether something is a business record, contact Legal Compliance.

The integrity of our records and public disclosure depends upon the validity, accuracy, and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records must be complete, accurate and timely. The making of false or misleading entries is strictly prohibited (e.g., including submitting false expense claims, forging, falsifying, or tampering with company documents or records of any kind).

As a Unity employee or representative, you must:

- Not take any action (or fail to take an action) to intentionally cause inaccuracies in a business record;
- Ensure records you create are timely and complete and do not misrepresent any material facts;
- Follow Unity policies and procedures on financial reporting where applicable;
- Never commit Unity to legal obligations that exceed the scope of your authority;
- Ensure that your expenses are reasonable, legitimate, and properly recorded; and
- Submit accurate certification statements about matters under your purview when requested by Finance or Legal Compliance.

Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others. We also rely upon our accounting and other business and corporate records in preparing publicly-filed reports and certifications provided to regulators, creditors and others.

Securities laws require that these reports provide full, fair, accurate, timely and understandable disclosure and fairly present our financial condition and results of operations. Employees who contribute in any way in preparing or verifying these reports should take all reasonable efforts to ensure that our financial disclosure is complete, accurate and transparent.

If you learn of any inaccuracies in our business records (intentional or otherwise), you are required to notify [Legal Compliance](#), or the EthicsPoint hotline at 1-855-754-3236 (additional localized phone numbers are available at www.unity3d.ethicspoint.com) or online at www.unity3d.ethicspoint.com.

Insider Trading

Through the course of your employment, you may become aware of material non-public information about Unity or one of Unity's customers, vendors, or partners. All non-public information about Unity or about companies with which we do business is considered confidential information, regardless of whether it is material. Information is "material" if it is reasonably likely to affect a person's decision of whether to buy, sell or hold a security, like the stock in a publicly traded company. To use material non-public information in connection with buying, selling, or holding securities, including "tipping" others who might buy, sell, or hold securities on the basis of this information, is not only unethical and a violation of Unity policy, it is also illegal, and can subject you and Unity to significant fines and penalties.

For more information about insider trading, please see Unity's [Insider Trading Policy](#).

Prediction Markets

Unity is committed to the highest ethical standards and prohibits the use of material non-public information for personal gain. You must maintain compliance with applicable laws and regulations and ensure that no material non-public information obtained through your professional role is used for personal gain. Accordingly, you may not use material non-public information learned in the course of your relationship with Unity to bet or wager on third-party platforms or prediction markets. Moreover, as prediction markets continue to proliferate and become increasingly accessible, it is essential to uphold the integrity of Unity and to avoid any actions that may raise even the appearance of impropriety. In view of that, you may not bet or wager on third-party platforms or prediction markets with respect to business, financial, or any other developments regarding Unity, whether or not such activity is based on material non-public information learned in the course of your relationship with Unity.

Data Privacy

At Unity, we take the protection of personal information in all aspects of the business very seriously and comply with all laws regarding data privacy. Personal information includes a range of different types of information, such as names, dates of birth, addresses, or even unique device identifiers or IP addresses that either identify an individual or are capable of being linked to an individual. Personal information about all individuals, including users of our products, Unity personnel and job applicants, and our

business contacts, needs to be handled as personal data subject to all legal protections.

If you are responsible for managing, receiving, or viewing personal information in your role, then you must endeavor to protect that information, access it only when necessary, follow the use rules set out by the Data Protection Officer (DPO), and bring any concerns around data privacy to your legal representative or Unity's DPO at dpo@unity3d.com. Of course, the rules and required protections around data privacy can be complex, so we ask that you review Unity's [Privacy Policy](#) and [Workforce Data Privacy Policy](#). You will also find resources on the [Privacy Intranet page](#), including links to request privacy reviews and a description of compliance processes for meeting privacy requirements.

Global Trade Compliance

Unity and our employees are required to maintain compliance with all applicable laws and regulations governing the international trade of our products, including but not limited to rules administered by the United States Treasury and Commerce Departments, and the European Union. For more information, please see Unity's [Export Control and Economic Sanctions Policy](#). Please raise any questions concerning this policy with the Trade Compliance team at trade-compliance@unity3d.com.

Human Trafficking and Modern Slavery

Human trafficking and modern slavery exists in many forms, which includes but is not limited to forced or bonded labor. Unity has a zero-tolerance approach to any form of human trafficking or modern slavery. We expect high standards of ethics from all of our employees, contractors, suppliers, and other business partners, such that there is no forced, compulsory, or trafficked labor, or anyone held in slavery or servitude (whether adults or children) in our supply chain. We adhere to all laws regarding working hours, minimum wage, age eligibility and benefits provisions in all countries that we operate in. For further information, please refer to our [Modern Slavery Transparency Statement](#).

Sustainability

Unity is committed to managing the impact of our business and protecting our environment. We expect suppliers and partners to follow applicable environmental laws and regulations, including emissions reduction, energy efficiency, water and resource conservation, waste disposal and recycling, conflict minerals and environmental reporting. Across our workplaces worldwide, we aim to foster a culture of environmental sustainability with our employees and our partners. For further information, please refer to our [Impact Report](#).

Waivers

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer (CEO), principal financial officer (CFO), principal accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of the New York Stock Exchange, a committee of the Board and will be disclosed to stockholders as required by applicable laws, rules, and regulations. Any matter which has been approved in accordance with the processes set out in or referenced in this Code will not be considered a waiver.

Safely Reporting Concerns

As the Code illustrates, Unity is committed to maintaining a safe and ethical environment where we are all proud to work. In order to accomplish this, we rely on you to let us know when problems arise so that we can be sure to quickly investigate and address the issues at the onset, before they can grow and negatively affect our culture.

Duty to Report Violations

In order to maintain a positive culture and compliant business, everyone at Unity, regardless of their title or position, has a duty to report violations of the Code, any other Unity policy, human rights or applicable laws. If you become aware of a potential violation, you must report it as soon as possible to a trusted manager, an HRBP, [Employee Relations](#), or [Legal Compliance](#). You should also feel free to discuss your concern with either our Chief People Officer or Chief Legal Officer/General Counsel. Alternatively, you can contact our EthicsPoint hotline by calling 1-855-754-3236 (additional localized phone numbers are available at www.unity3d.ethicspoint.com) or online at www.unity3d.ethicspoint.com. An independent third party administers the EthicsPoint hotline, so you may remain anonymous if you prefer to do so. If you receive a report as a manager, you are required to promptly report it to an HRBP, [Employee Relations](#) or [Legal Compliance](#). Of course, if your concern involves potential misconduct by another person and relates to questionable accounting or auditing matters under Unity's [Whistleblower Policy](#), you may report that violation as set forth in such policy.

Investigation of Reports

Unity takes all concerns and allegations seriously. We have formal processes for intake, prompt investigation, and reporting for reports of potential misconduct and policy violations.

If an investigation determines that a policy violation or other misconduct occurred, Unity will take appropriate remedial and, or, disciplinary action up to and including termination of employment.

Information disclosed during the course of an investigation will be kept confidential to the fullest extent practicable. All employees and managers are required to fully cooperate in an investigation or inquiry, and to answer questions truthfully and completely. Failing to cooperate or deliberately providing false information are grounds for disciplinary action, up to and including termination.

Non-Retaliation

Unity has a strict policy of non-retaliation. This means that any retaliation against someone for raising concerns in good faith, or for assisting with or participating in an investigation, is strictly prohibited. We strive to create an environment where employees can speak openly, and encourage our employees to ask questions and raise concerns. Anyone who is found to have engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination.

Any employee who feels they are being retaliated against should report it to a manager, HRBP, [Employee Relations](#), [Legal Compliance](#), or anonymously via the EthicsPoint hotline at 1-855-754-3236 (additional localized phone numbers are available at www.unity3d.ethicspoint.com) or online at www.unity3d.ethicspoint.com. Any report of retaliation will be promptly and thoroughly investigated in accordance with the Company's investigation procedures outlined above.

For a full list of Unity's Legal Compliance policies, please visit the [Legal Compliance Intranet page](#).

Additional Reporting

Nothing contained in this Code or Unity's Whistleblower Policy limits or otherwise prohibits any individual (including any current or former employee) from discussing or disclosing information about unlawful acts in the workplace, such as harassment, discrimination, retaliation, or any other conduct that you have reason to believe is unlawful, or communicating with, filing a charge or complaint with, or otherwise participating in any investigation or proceeding with any governmental or law enforcement branch, agency, entity, or commission, including providing documents or other information, without notice to Unity, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former employee through a communication that was subject to the attorney client privilege, unless such disclosure of that information would otherwise be permitted under local law.