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You don't just need a compliance policy; you need an ecosystem

By Jennifer Brewer

You know what word never shows up in a casual conversation? Compliance.

There's nothing casual about it—nothing warm, nothing fuzzy. If you're chatting with a colleague about weekend plans, family tales, sports scores, or the weather, the legalistic term "compliance" fits into a conversation about as well as a pinstripe suit at the beach.

So, it comes as no surprise that employees can spot the difference between a company trying to check a legal box and one invested in creating supportive, engaged environments. Policies are necessary, but what good are they if they exist solely to dictate and control rather than support and inspire people to do the right thing?

Before your company can bring clarity to employees all over the world and unite around a shared culture, you first need to understand your intentions, processes, and goals. Then, you have to empower ethics and compliance to make change.

At Activision Blizzard, the result is an ethics and compliance program we call Way2Play. It directly reflects and addresses employee needs and concerns. It uses language driven not by what we *can't* do but instead by what we *must* do to foster supportive cultures of integrity. As an empowered function separate from human resources and legal, Way2Play's success is a product of top-down clarity combined with enthusiastic, grassroots engagement.

Uniting cultures

First, a little corporate history. Activision was founded in 1979 as the first independent, third-party console video game developer. It created smash hits like *Call of Duty*, *Tony Hawk's Pro Skater*, and *Guitar Hero*. Activision merged with Vivendi Games—and then acquired Blizzard Entertainment, maker of *Diablo*, *StarCraft*, and *Warcraft*—in 2008. Activision Blizzard acquired *Candy Crush* and *Farm Heroes* maker King in 2016. Microsoft then acquired all of ABK, as we call ourselves, in October 2023.

This context is important because ABK isn't a monolith. This company is not merely composed of three business units with their own studios, franchises, and teams, but also three distinct cultures and many more distinct subcultures within. To successfully speak to employees who may not see the world the same way, it was clear that we had to do a lot of listening first.

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