



POLICY IN RESPECT OF HUMAN RIGHTS

Purpose

Cineplex is committed to respecting human rights in all our operations, in all geographic locations and in compliance with the laws of all countries in which we do business. Cineplex believes it is every employee's responsibility to create and maintain a work environment that reflects respect for human rights and that their behavior is aligned with this policy.

Scope

This Policy in Respect of Human Rights (the "Policy") applies to Cineplex Inc., the entities it owns, holds a majority interest in, and the facilities we manage, in any country around the world where we operate. We are also committed to working with our vendors, service providers and partners to uphold the principles of this Policy or to adopt similar policies for their business.

Policy

The actions of Cineplex employees are guided by our [Code of Business Conduct and Ethics](#) (the "Code"), which outlines our obligations to our guests and employees with respect to ethics and values, including specific obligations to uphold all human rights. The Cineplex Code, our [Harassment, Discrimination and Workplace Violence Policy](#), and other policies bring together our employees with a common value that the fundamental rights and dignity of all people must be respected, including but not limited to the rights of women and individuals in minority groups.

Our commitment is driven by the standards set forth in the laws of Canada which govern human rights, as well as the following international treaties to which Canada is a party:

- International Convention on the Elimination of All Forms of Racial Discrimination (1970)
- International Covenant on Economic, Social and Cultural Rights (1976)
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) (1981)
- Convention on the Rights of the Child (CRC) (1991)
- Convention on the Rights of Persons with Disabilities (2010)
- UN Universal Declaration of Human Rights

Through our corporate policies and procedures, Cineplex ensures the protection of our employee rights and entitlements. We expect each Cineplex employee to act lawfully toward other employees, guests, business partners and suppliers as outlined in the Code and other corporate policies. All employees are required to complete annual training and signoff of the Code and the Harassment, Discrimination and Workplace Violence Policy. Employees with roles and responsibilities relevant to aspects of human rights in our operations receive general awareness trainings on human rights.

Suppliers and Vendors

We expect our business partners (including suppliers and guests) to share our commitment to respect



human rights. Our suppliers are required to comply with all human rights obligations as set forth in our Supplier Code of Conduct [Supplier Code of Conduct](#) which sets forth our requirements for conducting business with Cineplex. Processes are in place to identify and manage health, safety and environmental risks associated with our supply base. We assess and monitor compliance of our suppliers with labour, employment and business ethics stipulations of the Supplier Code of Conduct.

General Rights and Obligations

Fair Labour Practices

All employment must be in full compliance with all applicable laws and regulations, including those concerning hours, compensation, opportunity and working conditions. Our operating companies are required to respect each employee's right to make an informed decision, free of coercion, about membership in associations and/or labour unions. Cineplex operating entities are required to bargain in good faith with these associations.

Forced Labour and Human Trafficking

Cineplex does not accept or condone any aspect of forced or compulsory labour. We strictly prohibit our employees, suppliers and other business partners from engaging in human trafficking-related activities or child labour.

Safe and Healthy Work Environment

In the interest of maintaining a safe and healthy workplace, Cineplex requires full compliance with applicable workplace safety and industrial hygiene standards as required by law, including specific obligations as set forth in our [Health and Safety Policy](#).

Dispute Resolution

Cineplex is committed to providing effective resolution where unintentionally we have caused or contributed to adverse human rights impacts. Employees who believe they have been subjected to behavior that conflicts with this Policy in Respect of Human Rights should seek assistance from their supervisor or HR representative.

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Cineplex reserves the right to amend this policy at any time. No item in this policy states or implies that a contract exists between Cineplex and its employees or that participation in this program is a guarantee of continued employment with Cineplex.