



CONFIDENTIAL INFORMATION POLICY

The following confidential information policy (the "**Policy**") was adopted by the Board of Directors (the "**Board**") of Cineplex Inc. (collectively, with its subsidiaries and affiliates, "**Cineplex**" or the "**Corporation**").

1. Public Disclosure vs. Importance of Confidentiality

- Cineplex is a publicly traded corporation and, as such, has a general obligation to publicly disclose information about its affairs to its shareholders and stakeholders. However, not all information concerning Cineplex's business operations should be publicly disclosed because premature, inadvertent or selective disclosure might diminish Cineplex's ability to compete in the marketplace or have a significant effect on the market price or value of Cineplex's securities.
- The following guidelines must be followed by all directors on the Board (the "**Directors**"), officers and employees of the Corporation including its subsidiaries and affiliates (collectively, "**Cineplex Personnel**") to prevent inadvertent disclosure of "Confidential Information" which is not intended or required to be made public.

2. Definitions

- "**non-public information**" means information which has not been publicly disclosed or disseminated by press release, news services or wire services.
- "**material information**" means:
 - any change in the Corporation's business, operations or capital that could reasonably be expected to have a significant effect on the market price or value of the Corporation's securities. A material change includes a decision to make such a change by the Board or by the Corporation's senior management under the belief that Board confirmation of such change is probable (collectively, "**material change**"); and
 - a fact that significantly affects, or would reasonably be expected to have a significant effect on, the market price or value of the Corporation's securities ("**material fact**").
- "**Confidential Information**" means non-public information and includes all knowledge, data and information, whether documented or undocumented, in digital, physical or other format about Cineplex's customers, business and affairs, or information that is deemed confidential under the terms of any agreement with a third party supplier or partner (the "**Confidential Information**").

3. Safeguarding Confidential Information

- This Policy may not cover all circumstances and exceptions with respect to Confidential Information. Any questions and all requests for exceptions from this Policy should be directed to the Corporation's Chief Financial Officer or General Counsel who will answer questions and determine whether it is appropriate to vary the Policy in such circumstances.
- Access to Confidential Information should be limited to only those Cineplex Personnel who have a business need to know the Confidential Information. Cineplex Personnel should safeguard Confidential Information and only use or disclose such Confidential Information in the course of performing their specific job duties.

- In safeguarding Confidential Information, Cineplex Personnel must:
 - not disclose Confidential Information to anyone, except in the necessary course of business;
 - not discuss Confidential Information in situations where they may be overheard;
 - not participate in discussions regarding decisions by others about investing in the Corporation (for example, through discussions in an investment club);
 - not read, display or leave Confidential Information unattended in public places, and not discard Confidential Information where others can retrieve such Confidential Information;
 - not use the Confidential Information for any purposes other than that for which it was intended or provided, including but not limited to personal gain;
 - ensure they maintain the confidentiality of Confidential Information in their possession both in and out of the office;
 - protect Confidential Information in electronic form by a password; and
 - comply with those safeguarding provisions contained in Cineplex's Communications and Technology Policy when using those communications and information technologies provided by the Corporation, which can be found on the Cineplex portal at <https://cineplex.sharepoint.com> (the "Portal").
- Cineplex Personnel must enter into a confidentiality agreement with third parties prior to disclosing any Confidential Information. Such third parties may also be required to agree not to trade in Cineplex's securities until the Confidential Information is publicly disclosed.
- The Corporation's Chief Executive Officer, Chief Financial Officer, Vice-President, Communications and Vice-President, Corporate Development & Investor Relations shall be the Corporation's designated spokespersons and shall be responsible for speaking on behalf of the Corporation to the news media, analysts, institutional investors and others who make or influence investments. All such disclosure shall be in compliance with the Corporation's Disclosure Policy, which can be found on the Portal. Any Cineplex Personnel who are specifically and expressly authorized to speak to the media, analysts and institutional investors should be briefed in advance to review what information is material information and what part of it has not been disclosed. Any person other than the Corporation's designated spokespersons should consistently refer all third party questions to a designated spokesperson and otherwise offer "no comment" with respect to enquiries in connection with market rumours. Designated spokespersons should be prepared to deflect questions relating to Confidential Information. After a substantive interview, press conference, discussion with an analyst or visit to the Corporation's premises by an analyst, a debriefing should be conducted to review what was said. If the debriefing uncovers selective disclosure of previously undisclosed material information, the Corporation must disclose the information generally.
- As a part of the Corporation's day-to-day operations, the Corporation will, where appropriate, routinely disclose Confidential Information to professional advisors such as external legal counsel and auditors. Such outside parties which are privy to Confidential Information must agree that they will not divulge such information to anyone else, other than in the necessary course of business and that they may not trade in the Corporation's securities until the information is publicly disclosed and public investors have been given a reasonable amount of time to analyze the information.
- While judgment and care should be exercised at all times, Cineplex Personnel responsible for a particularly sensitive matter should consider whether other steps are appropriate and should be undertaken to minimize the risk of Confidential Information being disclosed or otherwise compromised.

These steps include:

 - marking all envelopes or packages containing Confidential Information as confidential and for

- opening by the addressee only;
 - storing Confidential Information on computers in a manner that limits the risk of unauthorized access;
 - logging-off when away from computers for any substantial period;
 - not leaving laptops containing Confidential Information unattended in public places;
 - locking files containing Confidential Information in a drawer or cabinet, or covering or placing files containing Confidential Information out of sight when inviting third parties into work or home offices;
 - omitting names of parties and other identifying information from preliminary drafts of documents containing Confidential Information;
 - destroying all Confidential Information by shredding or other appropriate means of destruction;
 - holding telephone, video and other conversations (particularly those on speaker phones) regarding Confidential Information behind closed doors;
 - advising others if you are using a cellular or radio telephone so that no sensitive information is discussed;
 - prohibiting third parties and non-Cineplex Personnel from being unattended in areas where documents containing Confidential Information are located; and/or
 - advising third parties and non-Cineplex Personnel, other than outside legal counsel, that a “trading blackout” has been designated under the Insider Trading Policy.
- Misuse of Confidential Information, by Cineplex Personnel, is a serious breach of job responsibilities and may result in discipline up to and including termination of employment. Cineplex Personnel must notify their supervisor immediately in the event of any violation of this Policy.

Confirmed: March 6, 2024