



SUPPLIER CODE OF CONDUCT

At Cineplex, we conduct business with the highest level of integrity and ethics, and in accordance with all applicable laws and regulations. All our employees are required to adhere to these practices by reviewing and acknowledging the [CODE OF BUSINESS CONDUCT AND ETHICS](#). Our suppliers are integral partners to Cineplex and its employees in fulfilling our commitment to these principles.

We value our relationships with our suppliers because they help us achieve our business objectives and contribute to our overall success as an organization. We strive to award business to suppliers who demonstrate a strong commitment to sustainable development by adopting ethical, labour, health and safety, environmental principles and compliance practices that align with ours, and ensure the well-being of their employees, contractors and communities.

For the purposes of this Supplier Code of Conduct (“the **Code**”) a supplier means any direct or indirect vendor, broker, consultant, or other service provider to Cineplex Inc. and its subsidiaries, affiliates, and divisions (“**Cineplex**”). This Code sets forth the principles and ethical standards that we expect all our suppliers to work toward achieving throughout the course of our business relationship. Suppliers who knowingly violate laws or have repeated problems conforming to these principles may not receive our business.

1.0 – ETHICS

Business Integrity

In all of its activities, suppliers must ensure they conduct business in compliance with the applicable laws, rules and regulations of the jurisdictions in which they operate. Our suppliers are expected to maintain high standards of courtesy, professionalism, ethics and honesty in all its interactions with customers, shareholders and employees.

Gifts and Entertainment

Our suppliers must refrain from promising, offering, approving, giving or accepting of payments or gifts that are, or could be viewed as, an attempt to influence and individual’s actions, business decision or creating a sense of obligation. The nature of the gifts or entertainment must not, by the quality, quantity or timing, be used by suppliers to gain improper advantage or preferential treatment. Other than where immaterial in value, gift cards are considered as currency thus are not acceptable to gift or to receive as it could be considered as a bribe. We expect that suppliers will maintain appropriate records of exchanges of gifts and entertainment with our employees.

Anti-bribery and Anti-Corruption

Suppliers must not engage in any conduct that would put our organization at risk of violating anti-bribery laws.

2.0 - RESPONSIBLE BUSINESS PRACTICES

Privacy and Information Security

Cineplex is committed to respecting the privacy of our customers and employees' personal information and to appropriately safeguard all Cineplex information. We expect our suppliers to demonstrate the same respect for privacy and security throughout its operations, and to be demonstrably accountable with regard to personal information entrusted to them by Cineplex. Unless disclosure is authorized or legally mandated (for example by court order), our suppliers are expected to protect the confidentiality of its employees, contractor and customer information, including Cineplex proprietary, confidential and restricted information, in compliance with all applicable laws in the jurisdiction(s) in which they operate.

Responsible Sourcing of Materials

Cineplex will actively seek suppliers that recognize how important it is to reflect, respect and support the communities in we serve. Our suppliers are expected to evaluate the origin or source of its material(s) throughout its supply chains in order to reasonably assure that such materials have not been obtained in any illegal or unethical manner.

Outsourcing and Subcontracting

We recognize that outsourcing is a practice that suppliers may use to promote innovation, fill resource gaps, and/or create operational efficiencies. We also recognize that suppliers may need to use subcontractors in the performance of services. However, we expect suppliers not to subcontract services they perform for us or outsource activities that directly impact the delivery of goods and services to us, without reading and fully understanding this Code.

3.0 - HUMAN RIGHTS AND LABOUR STANDARDS

Forced Labour, Human Trafficking and Slavery

Suppliers shall not use any form of forced labour including prison, indentured, bonded, military, slave or any other forms of forced labour. Suppliers shall not participate in the recruitment, transportation, transfer, harbouring or receipt of any persons by means of threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation. Suppliers shall not retain an employees' government-issued identification, passports or work permits as a condition of employment and shall allow employees to resign from their positions at any time.

Child Labour

Suppliers shall ensure that no underage labour has been used in the production or distribution of its goods or services. Employees must not be younger than the minimum employment age established by each respective country or local jurisdiction. In the event no minimum employment age is established, employees must not be younger than the age of compulsory education.

Working Hours

Employee working hours of suppliers must be in compliance with all applicable laws and regulations. Suppliers should encourage employees to receive at least one day off every seven days.

Wages and Benefits

Suppliers must have a system in place to verify and accurately record payroll, deductions and hours worked by legally authorized employees. Suppliers must comply with all applicable wage and compensation requirements as defined under applicable labour laws for regular work, overtime, maximum hours, piece rates and other elements of compensation and employee benefits.

4.0 – HEALTH & SAFETY

Cineplex is committed to conduct business in a way that provides a safe and healthy work environment for our employees. We expect our suppliers to operate in a manner that complies with all applicable health and safety laws, regulations and standards and that our suppliers take the necessary steps to protect workers from workplace accidents, illness or injuries.

5.0 – ENVIRONMENT & SUSTAINABILITY

As good stewards, we strive to conduct business in a responsible and sustainable manner. We want to conduct business with suppliers who share our commitments to stewardship and who establish environmental policies and practices to manage, monitor and reduce the impact of its operations on the environment, thus assisting us in reducing our environmental footprint.

6.0 – PAPER PRODUCTS MAXIMIZE RECYCLED CONTENT

Cineplex believes that maximizing the use of recycled content is an important approach to relieving the stress on our forests, water and other natural resources. We give preference to paper with high recycled content and specifically post-consumer waste content. We encourage our suppliers to continually improve and expand the availability of recycled content in the paper materials we use.

Cineplex reserves the right to assess and monitor on an ongoing basis our suppliers' practices regarding this Code. To this end, Cineplex may request that a particular supplier complete a self-assessment, respond to specific questionnaire, provide sufficient document and proof for compliance and allow for inspections.

We appreciate your cooperation and further questions about this Code can be directed to Purchasing@cinplex.com.

Confirmed: June 2020