

## KINEPOLIS Code of Conduct for Commercial Partners

For Kinopolis social, ethical and environmental aspects are important elements to take into account in its daily business activities and Kinopolis wishes to see these values and business principles embraced and applied by its commercial partners (such as, but not limited to, suppliers, tenants and service providers). Kinopolis believes that successful companies provide safe and healthy working conditions for their employees, protect the environment and conduct business in a lawful and ethical manner. Therefore, Kinopolis has set the following minimum principles in this Code of Conduct that commercial partners should respect at all times:

### **Labor practices**

- Commercial partner must recognize the Universal Declaration of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work and act accordingly;
- Commercial partner must treat its employees fairly, with respect and dignity;
- Commercial partner shall refrain from forced labor practices, shall not engage or employ persons who have not reached the minimum working age required by local law or by national or international legislation and regulations, shall pay its employees not less than the applicable minimum wage and will ensure acceptable working hours and other adequate working conditions;
- As far as the applicable law allows, commercial partner must respect freedom of association and the right to collective bargaining;
- Commercial partner may not discriminate on the basis of gender, race, religion, disability, sexual orientation, union membership, political opinion or age.

### **Health, safety and environment**

- Commercial partner must conduct its activities with due respect for the environment. Commercial partner will do its best effort to put measures in place to minimize CO2 emissions, diminish energy consumption and reduce the impact on the environment in general;
- Commercial partner will do its best effort to minimize waste and dispose properly and in an environmentally responsible manner;
- Commercial partner must provide a safe and healthy working environment;
- Commercial partner shall take measures to protect the health and safety of consumers which includes providing reliable, environment friendly and safe products.

## **Law and ethics**

- Commercial partner must comply with all national and international laws and regulations and ensure they have all the necessary permits;
- Commercial partner must conduct its business in line with fair competition and in accordance with all applicable antitrust laws;
- Commercial partner must conduct its business with integrity and shall not engage in any form of fraud, money laundering, kickbacks, corruption, extortion or bribery;
- Commercial partner shall avoid conflict of interest situations in relationship with Kinopolis employees;
- Commercial partner will safeguard Kinopolis' confidential information in accordance with legal and contractual provisions and at least with the same degree of care as it would treat its own confidential information.

## **Commercial partners**

- Commercial partners are expected to impose upon their suppliers and subcontractors similar standards concerning law and ethics, labor practices, health and safety and environmental standards.

This Code of Conduct applies to all Kinopolis activities. It forms an integral part of the contract Kinopolis signs with its commercial partners and allows Kinopolis to conduct interim screenings to evaluate whether commercial partners are complying with these agreed principles. The commercial partner shall ensure appropriate documentation is in place in order for Kinopolis to be able to verify adherence to these requirements. Kinopolis expects commercial partners to take any requisite mitigation actions as a consequence of any gaps identified. If any violations come to light that are not resolved within an appropriate period of time, Kinopolis has the right to freely terminate for cause all contracts with the concerned commercial partner without any payment or compensation of any kind being due.

Eddy Duquenne  
Chief Executive Officer