



## 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**”).

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As used herein, a “material change” in the affairs of the Corporation means a change in the business, operations or capital of the Corporation that could reasonably be expected to have a significant effect on the market price or value of the securities of the Corporation. A “material change” includes a decision to make such a change by the Board or by senior management of the Corporation who believe that Board confirmation is probable and a decision to make such a change by the Board or by senior management of the Corporation who believe that such confirmation is probable. A “material fact” means 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 facts and material changes are collectively referred to in this Policy as “**material information**”.

While material information concerning the Corporation must generally be disclosed to the public promptly, there are a number of situations in which the immediate release of certain information would be unduly detrimental to the interests of the Corporation. Accordingly, the following guidelines must be followed by all directors on the Board (the “**Directors**”), officers and employees of the Corporation including that of its subsidiaries and affiliates (collectively, “**Cineplex Personnel**”), to prevent inadvertent disclosure of “material information” (defined above) that is non-public (ie. not previously disclosed) information, which includes any and all knowledge, data and information, whether documented or undocumented, in digital, physical or other format, concerning 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**”).

This Policy may not cover all circumstances and exceptions that may be justified with respect to Confidential Information from time to time. Any questions and all requests for exceptions from this Policy should be made to the Chief Financial Officer or the Chief Legal Officer of the Corporation who will determine whether or not it is appropriate to vary the Policy in such circumstances.

1. Access to Confidential Information should be limited only to 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.
2. In safeguarding Confidential Information, Cineplex Personnel must:
  - (i) not disclose Confidential Information to anyone, except in the necessary course of business;
  - (ii) not discuss Confidential Information in situations where they may be overheard;

- (iii) not participate in discussions regarding decisions by others about investments in the Corporation (for example, through discussions in an investment club);
  - (iv) not read, display or leave Confidential Information unattended in public places, and not discard Confidential Information where others can retrieve such Confidential Information;
  - (v) not use the Confidential Information for any purposes other than what it was intended or provided, including but not limited to personal gain;
  - (vi) ensure they maintain the confidentiality of Confidential Information in their possession both in and out of the office;
  - (vii) protect Confidential Information in electronic form by a password; and
  - (viii) 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 <http://central.cineplex.com/Pages/Home.aspx> (the "Portal").
3. 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 the Corporation's securities until the Confidential Information is publicly disclosed.
  4. The Chief Executive Officer, Chief Financial Officer and Executive Director, Communications of the Corporation, respectively, shall act as 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 that 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 spokesperson should consistently refer the 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 actually said. If the debriefing uncovers selective disclosure of previously undisclosed material information, the Corporation must disclose the information generally.
  5. 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 that are privy to Confidential Information will agree that they must 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.
  6. While judgment and care should be exercised at all times, Cineplex Personnel responsible for a particularly sensitive matter should consider whether other steps would be appropriate to minimize the risk of the Confidential Information being disclosed or otherwise compromised. Those steps might include, among others:

- (a) Marking all envelopes or packages containing Confidential Information as confidential and for opening by the addressee only;
  - (b) Storing Confidential Information on computers in a manner that limits the risk that unauthorized operators might gain access;
  - (c) Logging-off computers when away from the terminal for any substantial period;
  - (d) Not leaving laptops containing Confidential Information unattended in public places;
  - (e) Omitting names of parties and other identifying information from preliminary drafts of documents containing Confidential Information;
  - (f) Destroying all Confidential Information by shredding or other appropriate means of destruction;
  - (g) Holding of telephone and other conversations (and particularly those on speaker phones) regarding Confidential Information behind closed doors;
  - (h) Advising others if you are using a cellular or radio telephone so that no sensitive information is discussed;
  - (i) Prohibiting persons from outside the Corporation from being unattended in areas where documents containing Confidential Information are located; and/or
  - (j) Persons from outside the Corporation, other than outside legal counsel, should not be told whether a “trading blackout” has been designated under the Insider Trading Policy.
7. Misuse by Cineplex Personnel of Confidential Information 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 June 2020**