



The *WALT DISNEY* Company
and affiliated companies

Policy Manual for U.S. Production Cast and Crew

INTRODUCTION



I feel privileged to be part of The Walt Disney Company and to again lead this talented and dedicated workforce. As we celebrate our historic 100th anniversary, our company is unique in its proud heritage, incredible collection of brands, rich content, and its commitment to telling great stories and creating magic in people's lives every day.

The character of our company comes from the effort, integrity, and diversity of our people. Because we hold ourselves to the highest standards and prioritize an inclusive culture, our consumers and colleagues around the globe trust us to do the right thing, to behave ethically and respectfully, and to represent and reflect this phenomenal company in the best possible way at all times.

Our Policy Manual reiterates Disney's high standards of conduct and offers guidance on issues and situations you may face in the course of your work. I encourage you to review these policies and adhere to them as you perform your role for this company.

With thanks for your service and enthusiasm,

A handwritten signature in black ink that reads "Robert A. Iger". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Robert A. Iger

Chief Executive Officer
The Walt Disney Company



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OVERVIEW OF POLICY MANUAL



This Policy Manual of The Walt Disney Company and its subsidiary and affiliated companies (together, we refer to these as the “Company”) applies to cast and crew of U.S. television and film productions for the Company. “Production” shall refer to the specific television or motion picture production for which a cast or crew member is working. All cast and crew are expected to have reviewed this Policy Manual, to be familiar with its contents, and to conduct themselves consistently with the principles expressed. Failure to do so may result in disciplinary action. Cast and crew also are expected to follow any applicable guidelines and policies provided by the facilities where they perform their work for the Company or related to their Production, including those guidelines contained in any applicable deal memo, start packet or confidentiality agreement.

Important Note: Certain states and local jurisdictions have supplemental policy requirements. These policy supplements are available on www.productionpolicies.com. Cast and crew are expected to review and be familiar with the contents of the supplements applicable to their work locations and conduct themselves consistently with the principles expressed in those supplements.

This Policy Manual replaces the March 2022 version of the Policy Manual for U.S. Production Cast and Crew, but any Production-specific or business unit specific operating policies remain applicable. The Company may amend, supplement, or rescind any policy or provision in this Policy Manual as the Company deems appropriate. If the meaning or application of a policy is unclear, cast and crew should contact Human Resources.

Within the Policy Manual are references and/or links to additional information, including Company-wide rules, such as the [Standards of Business Conduct](#), and guidelines and practices that apply to certain cast and crew based on their

location, Production and/or business segment. As with this Policy Manual, cast and crew are expected to read and be familiar with the [Standards of Business Conduct](#) and these other work rules.

THREE IMPORTANT THINGS TO KNOW WHILE READING THIS POLICY MANUAL

1. These policies do not alter cast and crew’s status of employment. All cast and crew are at will unless subject to a written employment agreement specifying employment for a particular term. At will employment means the cast or crew member can be terminated (or reassigned or demoted) at any time, with or without cause or notice, and the cast or crew member can resign at any time with or without cause or notice. Cast and crew’s at will status can only be altered in a document explicitly stating that employment is no longer at will, signed by an authorized representative of the Company.
2. Cast and crew subject to a collective bargaining agreement (“CBA”) receive the benefits provided by their CBA, and this Policy Manual does not provide these cast and crew with any different or additional benefits. However, terms and conditions in this Policy Manual unrelated to cast and crew benefits, like those regarding cast and crew conduct, use of technology, etc., generally apply to cast and crew subject to a CBA unless their CBA provides different terms and conditions regarding those subjects.
3. Nothing in this Policy Manual should be interpreted as a restriction on cast and crew’s legal right to discuss their terms and conditions of employment with one another for their mutual protection and benefit. Any cast or crew member who believes compliance with the policies in this Policy Manual would conflict with this legal right should promptly discuss the matter with Human Resources.

STANDARDS OF BUSINESS CONDUCT



All cast and crew are expected to read and be familiar with the Standards of Business Conduct and to use them to guide the way they act.

The [Standards of Business Conduct](#) provide cast and crew with the information, resources and tools necessary to conduct themselves ethically and in compliance with the law. All cast and crew are expected to read and adhere to the Standards and to use them to guide the way they act.

There are six key principles that serve as the foundation of the Standards of Business Conduct:

- **Integrity:** We do what's right and take responsibility for our actions to protect our guests, our audiences, our consumers and our shareholders.
- **Trust:** We are committed to our guests and our customers – they are the reason we are here.
- **Teamwork:** We work together to protect the heritage we have built as a company with high ethical standards.
- **Honesty:** Protecting our reputation requires a commitment to truth and high standards in everything we do.
- **Play by the Rules:** We are committed to comply with the law everywhere in the world that we operate.
- **Respect:** As a member of the global community, we have a responsibility to be a good corporate citizen.

These principles define not only the operating principles of our Company, but also the spirit of our diverse global workforce and how we function.

We rely on our cast and crew to use the Standards of Business Conduct as well as their good judgment to guide their behavior and to ask questions if they are ever unsure of the proper course of action. Cast and crew can direct questions to their supervisor, department head, Unit Production Manager, Human Resources and/or Employee Relations partner, or they can contact the Guideline at 1-800-699-4870 or www.disneyguideline.com.

EQUAL EMPLOYMENT OPPORTUNITY



The Company proudly provides equal employment opportunity for all cast, crew, and applicants.

The Company proudly provides equal employment opportunity for all cast, crew and applicants and makes employment decisions consistent with this principle.

EMPLOYMENT DECISIONS

The Company's employment actions and decisions – including recruitment, hiring, promotion, compensation, demotion, transfer, layoff, termination and training – are made without regard to a cast or crew member's actual or perceived race (including traits associated with race, such as hair texture, hair type or protective hairstyles), religion, color, sex (including pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, gender, gender identity, gender expression, national origin, ancestry, age, marital status, military or veteran status, medical condition, genetic information or disability (mental or physical). The Company complies with any federal, state or local law that provides for additional categories of protection.

See also the [Disability Accommodation](#) policy.

HARASSMENT

This policy also prohibits harassment based on any of these protected categories. See the [Prohibition of Harassment and Bullying](#) policy for additional detail.

RAISING CONCERNS

Cast and crew who believe they have been harassed or discriminated against, or are otherwise aware of a violation of this policy, should follow the procedures outlined in the [Speak Up](#) policy. These procedures include notifying their immediate supervisor, department head, Unit Production Manager, Human Resources and/or Employee Relations partner, or they can call the Company Guideline at 1-800-699-4870. Cast and crew in California may also contact the California Civil Rights Department at 1-800-884-1684 or online at <https://calcivilrights.ca.gov>.

The Company will not tolerate retaliation against a cast or crew member who has raised a concern in good faith or has cooperated with an investigation into a concern.

Any cast or crew member found to have violated this Equal Employment Opportunity policy will be subject to discipline, which may be termination.

CAST AND CREW CONDUCT AND PERFORMANCE



The Company expects cast and crew to conduct themselves professionally and to perform their jobs satisfactorily.

The Company expects cast and crew to conduct themselves professionally and to perform their jobs satisfactorily and will take action when cast and crew do not meet the Company's high standards. This policy applies to the workplace (both on and off Company property) and in other settings in which cast and crew may find themselves in connection with their jobs (which can occur after regular work hours or away from the regular workplace).

PERFORMANCE

Cast and crew are expected to perform their jobs satisfactorily and to accept and productively respond to feedback concerning their performance. Performance below our standards may be addressed in a manner deemed appropriate by the Company in the particular circumstance.

CONDUCT

While it is impossible to identify every type of improper conduct that may lead to discipline, cast and crew should be aware that the following behavior will subject them to some form of discipline (and in some cases, immediate termination):

1. Violation of any provision of this Policy Manual, the [Standards of Business Conduct](#), or any Production-specific policy;
2. Conduct toward the cast or crew member's supervisor, direct reports, coworkers, or anyone with whom the cast or crew member comes in contact while performing work for the Company/Production that is unprofessional, discourteous

or disrespectful [**Note:** Speaking up about concerns in the workplace, including concerns about a supervisor or expressed to a supervisor, does not violate this policy as long as it is done professionally and courteously];

3. Disregard for any safety rule or procedure, or any act of violence or other behavior that poses a risk of harm to the cast or crew member or others;
4. Any act of theft, dishonesty and/or falsification, including falsification of time records;
5. Failure or refusal to comply with a Company directive, including refusal to participate in a Company investigation or failure to complete mandatory Compliance training;
6. Misuse of any Company benefit or perk;
7. Being under the influence of any intoxicating substance while working;
8. Circumvention of an established workplace protocol, operating guideline or approval process.

Improper conduct may be addressed by such steps as verbal counseling, verbal or written warnings, suspension and/or termination, as deemed appropriate by the Company in the particular circumstance.

Cast and crew should keep in mind that nothing in this policy, or in the Company's or Production's implementation of discipline or performance management, changes the at-will nature of employment, which applies to all cast and crew unless subject to a specific written agreement that provides otherwise.

PROHIBITION OF HARASSMENT AND BULLYING



Cast and crew are expected to treat others in the workplace with respect, dignity, fairness and integrity.

Cast and crew are expected to treat others in the workplace with respect, dignity, fairness and integrity and must not engage in harassing or bullying behavior. This policy encompasses behavior that is prohibited by law and behavior that, while not necessarily unlawful, nevertheless violates the Company's standards for workplace conduct. The policy applies to the workplace (both on and off Company property) and in other settings in which cast and crew may find themselves in connection with their jobs or that impact the workplace (which can occur after regular work hours or away from the regular workplace).

HARASSMENT BASED ON A PROTECTED CATEGORY

Harassing conduct that is based on a protected category is prohibited by law, whether committed by supervisors, coworkers, or third parties in the workplace, and will not be tolerated by the Company. "Protected categories" include a person's actual or perceived race (including traits associated with race, such as hair texture, hair type or protective hairstyles), religion, color, sex (including pregnancy, childbirth, breastfeeding and related medical conditions), sexual orientation, gender, gender identity, gender expression, national origin, ancestry, age, marital status, military or veteran status, medical condition, genetic information, or disability (mental or physical) and any additional category set forth in any federal, state or local law. Conduct that may be considered

as contributing to unlawful harassment when based on a protected category includes slurs, offensive jokes or teasing and disparaging comments – whether done in person or phone, by email, text, internal collaboration tools, social media, visual displays (for example, posters or articles of clothing), or otherwise. Such conduct can be unlawful when it is particularly egregious or when it is repeated, creating a hostile working environment and altering the conditions of employment.

Sexual harassment is one form of harassment based on a protected category and prohibited by law and this policy. Hostile environment sexual harassment can include any of the previously mentioned types of conduct as well as offensive touching, staring and stalking, gestures, violating personal space, requests for sexual favors, conversation containing sexual comments and other unwelcome advances. In addition to hostile environment harassment, sexual harassment can take the form of "quid pro quo" harassment, which includes making unwanted sexual advances and/or requests for sexual favors where submission is a condition of employment or where submission to or rejection of the advances or requests is used as the basis for employment decisions.

In addition to coworkers, cast and crew are prohibited from harassing customers, guests, contractors, vendors and any others with whom they interact in their work environment.

While harassment based on a protected category must meet certain legal standards to be unlawful, such as being "severe or

PROHIBITION OF HARASSMENT AND BULLYING (CONT.)



pervasive," these standards do not necessarily have to be met for the Company to determine that conduct has violated Company policy. The Company's prohibition of harassment encompasses a broader range of conduct than what is prohibited by law.

BULLYING

Abusive conduct, often referred to as "bullying," is a type of conduct that may not be unlawful but is against Company policy. Bullying need not be related to a protected category. Bullying in the workplace includes repeatedly making derogatory or insulting remarks; intentional targeted isolation; serious or repeated verbal or physical conduct that could reasonably be considered threatening, intimidating or humiliating; spreading malicious rumors; misuse of power or position; or intentionally sabotaging or undermining another's work performance. It does not include legitimate and constructive criticism of a cast or crew member's performance or behavior, or reasonable requests made of cast and crew.

Bullying can be physical, verbal or other conduct, including written material or pictures sent via email, text, internal collaboration tools or social media.

RAISING CONCERNS AND INVESTIGATIONS

The Company strongly encourages cast and crew to immediately speak up if they are subject to or witness conduct prohibited by this policy. Cast and crew who believe they have been subjected to discrimination, harassment or bullying by a coworker, guest, or other person in their workplace, or are otherwise aware of a violation of this policy, should follow the procedures outlined in the [Speak Up](#) policy. These procedures include notifying their immediate

supervisor, department head, Unit Production Manager, Human Resources and/or Employee Relations partner, or they can call the Company Guideline at 1-800-699-4870. Cast and crew in California may also contact the California Civil Rights Department at 1-800-884-1684 or online at <https://calcivilrights.ca.gov>.

The Company takes reports of discrimination and harassment very seriously. Managers who become aware of possible violations must notify Human Resources or Employee Relations. When the Company receives allegations of misconduct, it will conduct a fair, timely and thorough investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. Every concern will be investigated in the manner and to the extent appropriate to the circumstances, and investigations will be conducted as confidentially and expeditiously as possible. Cast and crew have an obligation to cooperate fully and openly and honestly share information in any Company investigation.

The Company will not tolerate retaliation against a cast or crew member who has raised a concern in good faith or has cooperated with an investigation into a concern. Cast and crew who believe they have been retaliated against should immediately report the conduct, using one of the avenues outlined in the [Speak Up](#) policy.

DISCIPLINE AND OTHER REMEDIAL MEASURES

If an investigation uncovers misconduct, the Company will take appropriate remedial measures. Any cast or crew member found to have violated this Prohibition of Harassment and Bullying policy (including the prohibition of retaliation) will be subject to discipline, which may be termination.

SPEAK UP



The Company is committed to doing business in an ethical, trustworthy way that is beyond reproach, with respect for the law and the Company's values. Nevertheless, there may be occasions when cast and crew observe conduct that concerns them or that seems to violate Company policies, the [Standards of Business Conduct](#) or applicable law. Cast and crew who observe or suspect such misconduct are strongly encouraged to Speak Up to provide the Company the opportunity to address and correct the issue as soon as possible. Remaining silent about possible misconduct can allow a situation to get worse or cause additional damage to the Company and its reputation.

The Company values the help of cast and crew who Speak Up about potential concerns and does not tolerate any form of retaliation against anyone who in good faith raises concerns or participates in or cooperates with an investigation into concerns of misconduct.

SPEAK UP – ABOUT WHAT?

This Speak Up policy can be used to raise concerns about any suspected misconduct or policy or legal violations, including concerns regarding:

- Discrimination, harassment or bullying
- Fraud or improper use of Company resources
- Environmental, health and safety issues
- Unauthorized access to Company systems/information or other security lapses
- Improper disclosure of confidential information
- Violations of other Company policies
- Violations of applicable laws and regulations
- Retaliation against anyone for Speaking Up in good faith

This policy is not intended to be used to report issues that present an immediate threat to life or property. For those situations, cast and crew should refer to and

follow the provisions of the [Safety, Health and Accident Prevention](#) and [Security](#) policies. It also should not be used to make accusations a cast or crew member knows are false. Doing so may lead to disciplinary measures.

SPEAK UP – TO WHOM?

The Company provides multiple avenues for cast and crew to Speak Up and raise concerns. The Company encourages cast and crew to first raise issues with their immediate supervisor, department head, or Unit Production Manager, and to do so as soon as the issue arises. If this does not resolve the issue, or if such a discussion is not productive or is not practical given the nature of the concern (including if the concern is about that person), cast and crew are encouraged to raise the issue to the next level of management.

Cast and crew also may raise a concern to Human Resources or Employee Relations. Alternatively, cast and crew may use the Company Guideline by calling 1-800-699-4870 or online at www.disneyguideline.com. Concerns to the Guideline may also be submitted anonymously.

As noted in the [Prohibition of Harassment and Bullying](#) policy, managers who become aware of possible violations of that policy must notify HR or Employee Relations.

Cast and crew are encouraged to Speak Up as soon as possible—ideally before a situation gets out of hand or causes significant damage. Cast and crew should not try to investigate the matter themselves but instead should allow the Company to assess and investigate the concern.

SPEAK UP – WHAT HAPPENS NEXT?

The Company takes every report of possible misconduct seriously. The Company's actions in response to a concern will depend on the nature and

SPEAK UP (CONT.)



severity of the concern. Upon receiving a report, the Company typically will conduct an initial review to assess the concern, and where appropriate, follow up with an investigation that fits the situation. The Company will take these steps in a fair and unbiased manner and do so as confidentially and expeditiously as possible. Cast and crew have an obligation to cooperate fully—and to openly and honestly share information—in any Company investigation.

NO RETALIATION

Coming forward with questions or concerns may sometimes feel like a difficult decision, but the Company is committed to fostering an environment that encourages and protects people who Speak Up when they observe conduct that may violate our policies, the Standards of Business Conduct or applicable laws and regulations, or who participate in or cooperate with an investigation of such concerns. Accordingly, the Company strictly prohibits any form of retaliatory action against any person who in good faith uses the Company's Speak Up policy, reports misconduct, participates in an investigation, participates in any proceeding or hearing conducted by a governmental enforcement agency, or opposes actual or perceived violations of the Company's policies or applicable laws or regulations.

"In good faith" means the cast or crew member has made a genuine attempt to provide honest and accurate information, even if they are later proven to have been mistaken. The Company reserves the right to discipline anyone who knowingly makes a false accusation or has acted improperly.

Retaliation is prohibited by law in many contexts, but the Company's policy encompasses a broader range of conduct than what the law prohibits. Examples of retaliatory action that Company prohibits include:

- Demotion, suspension, or termination of employment
- Denying benefits or taking away opportunities for advancement
- Reducing pay or hours
- Intimidating, ostracizing, making threats, and other harassing conduct
- Blocking or threatening to block from future employment in an industry
- Reassignment to a less desirable position
- Creating or allowing a work atmosphere that is hostile toward someone who has reported a concern

Cast and crew who believe they have been retaliated against—or who notice any retaliatory actions against someone else—for having raised a concern in good faith should immediately report the conduct using any of the avenues mentioned in this policy.

Any cast or crew member found to have engaged in retaliation will be subject to discipline, which may be termination.

CONFIDENTIAL INFORMATION



The protection of confidential and proprietary business information and trade secrets is vital to the Company's and Production's interests and success.

The protection of confidential and proprietary business information and trade secrets is vital to the Company's and Production's interests and success. We trust cast and crew to receive confidential information and not use or share it except for Company/Production business purposes. Confidential information should never be used for a cast or crew member's personal benefit or disclosed to others inside or outside of the Company/Production who don't have the right to it – and the need for it – to carry out their assigned work or meet the business need. In addition, accessing confidential Company/Production information without a need to know is prohibited. Violation of this policy may result in disciplinary action, which may be termination.

The obligation to not use or disclose confidential information continues even after employment ends.

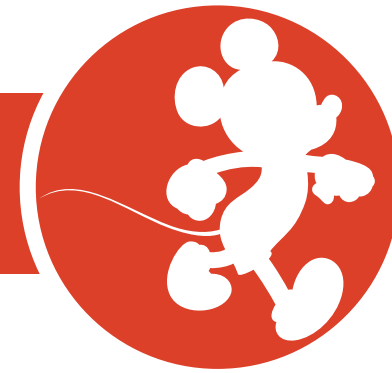
Cast and crew are expected to familiarize themselves with and follow the "Protecting Company Assets" section of the [Standards of Business Conduct](#), which contains additional information, including a definition and examples of "confidential information."

Cast and crew should understand that confidential information includes artwork; call sheets; production calendars; one line schedules; actor, cast and crew likenesses and private information; creative elements; dailies; locations; one lines; props; scripts; storyboards; screenplays; edited

episodes; screeners; underlying literary material; audio, photographic, or audiovisual recordings of any aspect of the production; cast and crew lists; and security titles. Cast and crew should not make any unauthorized use, reproduction, sale and/or distribution of any production materials, including providing these items for free on the Internet or on any form of media, including, but not limited to television, radio, newspaper or other periodical, websites, blogs, or any form of social media.

Cast and crew are also expected to follow any local or departmental production and/or post-production content protection standards that apply to their work, as well as any applicable contractual confidentiality provisions. In addition, to the extent cast and crew come to obtain, know of or possess any confidential information, they must abide by any applicable Non-Disclosure Agreement.

CORPORATE IDENTITY AND USE OF COMPANY NAMES, CHARACTERS OR SYMBOLS



The Company's trademark names, fanciful or copyrighted characters, and other intellectual property may only be used in connection with official, authorized Company business, and may not be used by anyone to imply that the Company sponsors, endorses or is connected with any business, program, product, service, club or organization not part of or directly related to the Company's business activities.

COMPANY MARKS, LOGOS, CHARACTERS & NAMES

This policy applies to all uses of Company marks, logos, characters and names, including, for example, on stationery materials (such as letterhead, envelopes, business cards and note paper), reports, presentation materials, memoranda, business to business websites, email messages, fax cover sheets, articles of clothing and novelty items, except on merchandise authorized for sale to the public in the regular course of the Company's business.

Company marks, logos, characters and corporate names must be used consistently and precisely. The design of any Company logo or mark, or use of Company logos, marks or characters on any Company materials, requires prior approval from the Corporate Graphics Department.

Corporate logos, corporate names and tag lines may not be altered in any manner. Company logos, marks or names may not be used in conjunction with logos, marks or names of non-Company entities or businesses.

NO INFRINGEMENT

Cast and crew must respect the laws regarding copyrights, trademarks, rights of publicity and other intellectual property rights and must not infringe on Company or third-party copyrights, logos, brand names, taglines, slogans or other trademarks.

CONFLICTS OF INTEREST



Cast and crew should make objective decisions on behalf of the Company and avoid situations where a conflict (or apparent conflict) exists between the Company's interests and their own, personal interests.

Conflicts of interest are addressed in the [Standards of Business Conduct](#), which all cast and crew are expected to read and follow.

Where applicable, cast and crew are required to disclose conflicts of interests with the Production using the forms that may be located in the Production start packet. Prior disclosure of any potential conflicts of interest does not necessarily preclude employment, but will be reviewed against the Company's policy on conflicts of interest.

PERSONAL AND FAMILY RELATIONSHIPS



Certain types of personal and family relationships must be disclosed.

The Company wishes to avoid the actual or perceived conflicts of interest, undue influence, favoritism, opportunities for collusion, and confidentiality concerns which may result from family members working together (“family relationships”), and from romantic or sexual relationships in the workplace (“personal relationships”), which can raise additional concerns such as potential sexual harassment.

As discussed below, certain relationships are prohibited, whereas other relationships are strongly discouraged and may be prohibited based on the specific circumstances.

CATEGORIES OF WORKPLACE RELATIONSHIPS THAT ARE PROHIBITED

The Company prohibits personal relationships between a manager at any level and one of their direct reports. For purposes of this policy, a cast or crew member is a manager’s direct report if the manager directly or indirectly manages or assigns work or significantly influences key terms and conditions of employment such as compensation, benefits, performance evaluation, assignments, promotion or disciplinary action.

CATEGORIES OF WORKPLACE RELATIONSHIPS THAT ARE STRONGLY DISCOURAGED

The Company strongly discourages family relationships between a manager at any level and one of their direct reports. In addition, the Company strongly discourages both personal and family relationships in the following situations:

1. Relationships between a manager at any level and the subordinate of a direct report (that is, between two individuals within a chain of command but not in a direct reporting relationship).
2. Relationships between cast or crew members (including non-managerial individuals) where one cast or crew member assigns the work duties or sets the work schedule of the other.
3. Relationships between two cast or crew members where the nature of their respective positions, or the functions they perform, could compromise the business judgment of one or both of them.

OBLIGATION TO DISCLOSE

If a cast or crew member is involved in any of the above categories of personal or family relationships, or similar close personal relationship, they must notify the Unit Production Manager as soon as such a relationship arises, and, where applicable, disclose the relationship on the form provided in their start packet. Failure to so notify or disclose is a violation of this policy and is grounds for disciplinary action. Further, if a supervisor is aware that one or more cast or crew member under their supervision is involved in such a relationship, that supervisor must notify Human Resources/Employee Relations immediately. Failure to raise the issue to Human Resources/Employee Relations is a violation of this policy and is grounds for disciplinary action.

PERSONAL AND FAMILY RELATIONSHIPS (CONT.)



ACTIONS THE COMPANY MAY TAKE

When the Company becomes aware of such a relationship, through notice or otherwise, the Company will determine what action is appropriate under the circumstances to address its business concerns. Appropriate action can include reassignment, a change in job responsibilities, or termination.

COMPANY/PRODUCTION PROPERTY AND PERSONAL PROPERTY



Company/Production equipment and other Company/Production property are provided to cast and crew for business purposes only. Examples of Company/Production property include, but are not limited to, computers, mobile devices, email and other electronic records, documents, phones, desks, cabinets, lockers, clothing, identification cards, vehicles, keys, access cards and office supplies.

NO EXPECTATION OF PRIVACY

When using Company/Production property, cast and crew must comply with all Company and Production policies and have no expectation of privacy. The Company reserves the right to access and inspect Company property when it deems appropriate and without notice.

POSSESSION/USAGE

Cast and crew must ensure that Company/Production property in their use or possession is kept secure and in good repair. Immediately upon separation, cast and crew must return any and all Company property in their possession to their supervisor or, if so directed, to Human Resources. All items purchased for the Production are the property of the Production and must be returned at the end of the cast or crew member's employment or at the end of production (whichever is earlier).

SET/SHOW PIECES

Cast and crew are prohibited from taking any set piece from the Production whether used or not. This includes, but is not limited to, the Production's art work, storyboards, props, set designs, costume accessories, and wardrobe.

NO DUPLICATION

Cast and crew identification cards, Company/Production keys and access cards may not be duplicated.

PERSONAL PROPERTY

For the safety of our cast and crew and guests, any vehicles on Company premises or Production locations are subject to search.

Cast and crew are discouraged from bringing valuable personal property onto Company premises or Production locations. The Company is not responsible for loss or theft of cast or crew member's personal property. While on Company premises or Production locations, cast and crew are expected to consent to the Company's request to search personal property (such as purses, briefcases and packages), when the Company reasonably believes the search will assist in the investigation of safety or security concerns or work-related misconduct.

Certain areas of Company property or Production locations are subject to video monitoring.

See also the [Computer Usage and Security](#) policy.

ANIMALS IN THE WORKPLACE



The Company generally does not permit cast and crew to bring animals, including pets of any kind, into the workplace because of health, safety and security concerns, as well as disruption to the work environment. Exceptions are made when authorized as a disability accommodation or for animals used in Productions.

SERVICE AND SUPPORT ANIMALS

A service animal is an animal used to guide or assist persons with disabilities in the activities of independent living. A support animal is an animal that provides emotional, cognitive or other similar support to a person with a disability.

Cast or crew members who require the assistance of a service or support animal at work must request and obtain an accommodation through the Company's [Disability Accommodation](#) policy. Approved service or support animals that will accompany a cast or crew member at work will be issued an appropriate work badge/ID to be attached to the animal's leash/harness at all times.

Service and support animals must be clean, well-behaved, non-disruptive and non-aggressive. They must also be properly licensed and vaccinated. They must be on a leash, harness or other type of restraint at all times, except in the case of a service animal that cannot be kept on leash to be able to perform its duties for the cast or crew member.

Animals must be supervised at all times. Animals cannot be allowed off leash to wander through the workspace or Production locations. Owners are responsible for using approved locations for animal relief and cleaning up after their animals. Animal waste must be placed in sealed bags prior to disposal.

Animal owners will be financially responsible for any injuries to cast, crew or Guests or damage to Company/Production facilities caused by their animals, including damage from accidents, excessive pet hair, fleas and odor removal.

The owners of disruptive or aggressive animals will be asked to remove them from Company premises or Production locations until the Company determines that appropriate steps have been taken to remedy the problem.

ANIMALS USED IN PRODUCTIONS

For Productions on Company property, a production animal may enter Company property if prior arrangements have been made with the Production's Operations team managing the animal. The animal should be issued a "Show Animal ID Card" if repeat access to Company property is required, and the ID should be current in order for entry to be granted. If someone arrives at an entrance to Company property with a production animal without having made prior arrangements, Security officers should direct the vehicle to a safe location and ask for a point of contact. The officer should update the Global Security Communication Center (GSCC) and request that they call the point of contact and obtain authorization before permitting the animal on property.

For Productions not on Company property, follow any applicable procedures provided by the Production location regarding production animals.

ATTENDANCE



SATISFACTORY ATTENDANCE

Cast and crew must report to work, on time, unless their absence is excused. Absenteeism and/or tardiness may subject cast and crew to disciplinary action.

Cast and crew should refer to and comply with any Production-specific policies and procedures, as well as any segment-specific attendance policies that apply to their work.

RECORDING TIME

Cast and crew must keep accurate time and attendance records. Cast and crew who falsify a time record will be subject to termination.

SOLICITATION AND DISTRIBUTION



The Company limits solicitation and distribution on Company premises and Production locations.

To maintain a positive and productive business environment where cast and crew can focus on the Company's business free from distractions and interruptions, the Company limits solicitation activities and distribution of materials on Company premises (including remote event locations) and Production locations.

DEFINITIONS

"Distribution" includes handing out, posting or messaging on social media, emailing, faxing or otherwise communicating leaflets or other written literature; dispensing goods for purchase; and other similar activities.

"Solicitation" includes asking someone to make a donation; to purchase goods, services or tickets; to support a cause; to join or participate in an organization or club; and other similar activities.

"Working time" is any time when a cast or crew member's duties require that they be engaged in work tasks, but does not include their own time such as meal periods, breaks, or the time before or after their scheduled work hours.

POLICY FOR CAST AND CREW

Cast and crew may not use Company/Production email or computer systems to solicit for commercial ventures, or otherwise for their individual/personal benefit. Notices or other written material may not be posted on Company property or Production locations without prior approval of the Company/Production.

Cast and crew are prohibited from engaging in solicitation or distribution when either they or the person they are soliciting or distributing to is on working time. Additionally, cast and crew may only engage in distribution of tangible items in non-working areas, such as break rooms. Any permitted solicitation or distribution should be done in a respectful manner.

POLICY FOR THIRD PARTIES

Third parties are not allowed onto Company premises or Production locations to engage in solicitation or distribution activities at any time. This includes solicitation or distribution through Company/Production email.

SPEAKING ON BEHALF OF THE COMPANY/PRODUCTION



To ensure that information provided to the public is complete, consistent and accurate, cast and crew should not speak on behalf of the Company/Production unless authorized to do so.

Cast and crew who receive an invitation to speak at a seminar or other event in their capacity as a cast or crew member or on a topic related to work for the Company/Production must advise their supervisor and obtain written approvals from the applicable Executive (e.g., Show Executive, Vice President, Production Communications department) prior to accepting the invitation. In addition, cast and crew must comply with the “Gifts, Entertainment and Hospitality” section of the [Standards of Business Conduct](#) to the extent they receive anything of value in connection with the speaking engagement (e.g., speaker fees, meals, travel costs), and they must disclose any such compensation in their request for written approval.

Cast and crew should also familiarize themselves with the “Speaking on Behalf of our Company” section of the [Standards of Business Conduct](#) and the [Use of Social Media](#) policy.

SUBMISSION OF CREATIVE IDEAS



To avoid disputes or misunderstandings, the Company does not accept unsolicited submissions of creative ideas or content by third parties.

Creative ideas and content submitted by cast and crew may be used by the Company in any manner, with no additional payment or benefit beyond the cast or crew member's regular compensation.

It is the Company's long-standing policy not to accept, but rather to reject in a courteous fashion, the submission of creative ideas and content from third parties without prior authorized invitation.

Cast and crew, by contrast, may share their own creative ideas and content with the Company, whether or not related to their regular job responsibilities, with the understanding that the Company can use those contributions in any manner whatsoever without providing the cast or crew member any payment or other benefit beyond their regular compensation as a cast or crew member.

The terms "idea" and "content" include all creative suggestions, artwork, designs, theme park attraction concepts, game proposals, computer or mobile technology apps, scripts, screenplays, treatments, manuscripts, books, videos and songs, in whatever form, from whatever source, and however communicated.

PURPOSE

This policy aims to prevent disputes or misunderstandings regarding the origin of projects developed by the Company. Adhering to this policy helps to protect the Company against claims that a creative idea or content reviewed by the Company, or left unreviewed in Company files, is the source of a project the Company develops.

This policy also eliminates any expectation by cast and crew that they will receive any other benefit or payment (beyond their regular compensation as a cast or crew member) for any creative ideas or content they submit to the Company, whether or not the submission relates to the cast or crew member's regular job responsibilities.

WHAT TO DO: UNSOLICITED SUBMISSION BY THIRD PARTIES

If a submission is attempted by telephone or in person, cast and crew should stop the conversation and politely inform the individual that Company policy does not permit the acceptance of unsolicited creative ideas.

For written submissions, cast and crew should stop reading the material as soon as they realize it is the submission of an unsolicited creative idea and send the material to their Unit Production Manager or Human Resources, who will forward it to the Legal Department.

Cast and crew should not retain copies of any unsolicited ideas, make any notes about the ideas, or forward information about the ideas to others.

- **Exceptions** – The acceptance for review of scripts, treatments and presentations submitted to authorized staff of the Company's television and motion picture studio segments, in the regular course of their business,

SUBMISSION OF CREATIVE IDEAS (CONT.)



by or through agents, producers or managers recognized as customarily making such submissions, is permitted.

CAST AND CREW SUBMISSIONS

Cast and crew may submit creative ideas or content outside the scope of their job responsibilities, with the understanding that by doing so: (1) the Company has, at minimum, a non-exclusive license to and may use the submission in any manner and for any purpose; and (2) except to the extent provided in a written contract signed by an authorized Company representative or in the official rules of an authorized invitation, contest or procedure, the cast or crew member is not entitled to any additional payment or benefit beyond their regular compensation as a cast or crew member and is not entitled to any acknowledgment of their contribution (e.g., credit).

Of course, ideas, inventions or content submitted or created within the scope of a cast or crew member's responsibilities, or under other circumstances specified in a cast or crew member's confidentiality or other agreement, are exclusively owned by the Company.

COMPUTER USAGE AND SECURITY



Cast and crew must use Company/Production computer resources responsibly and in an appropriate manner.

Cast and crew must use Company/Production computer resources responsibly and in an appropriate manner. Misuse of Company/Production computer systems will result in disciplinary action, which may be termination.

APPROPRIATE USE OF COMPANY SYSTEMS

Company/Production computer systems may not be used for unlawful activities, including copying, downloading, distributing, streaming, storing, displaying or using software or other copyrighted materials in violation of copyright laws or license agreements. Cast and crew who are uncertain as to the appropriate use of these systems should seek clarification from their supervisor or Global Information Security (GIS).

Software or other copyrighted material licensed from a third party may be used only in accordance with the license agreement. Cast and crew unsure about appropriate use should contact the Legal Department.

Company/Production computer systems are provided for business purposes. The Company understands that cast and crew will use these systems from time to time for personal activities. Cast and crew should have no expectation of privacy when doing so. Such personal use should be reasonable and must not interfere with work performance or create cost or liability to the Company or Production. Cast and crew may not use these systems to solicit for commercial ventures, or otherwise for their individual/personal benefit. Cast and crew with a Company/Production email address should use that

address when conducting Company/Production business. Cast and crew may not engage in conduct that is inappropriate or prohibited by law, or that violates the Company's [Prohibition of Harassment and Bullying](#) policy, [Use of Social Media](#) policy, or other Company/Production policies. For instructions on how to obtain a Company/Production email address or to understand variances in computer or email usage, please refer to specific Production guidelines.

COMPANY OWNERSHIP AND ACCESS

Email messages and other electronically stored documents and data pertaining to or embodying Company business, wherever stored, are Company property. Such messages, documents and data should be preserved in accordance with Company retention policies and made available to the Company upon request.

Management, in its sole discretion and without further notice, may access, monitor, review, remove, disclose and/or control any aspect of access to or use of Company/Production computer systems (e.g., equipment, software, systems, networks, data, documentation, or files, including individual cast or crew member computer files, email messages, instant messages or Internet usage) but limited only to the files on cast and crew's personal computers that relate directly to the Production.

The use of computer passwords to access Company/Production equipment or systems does not constitute any

COMPUTER USAGE AND SECURITY (CONT.)



promise of confidentiality to any cast and crew regarding any communications or material created, accessed or stored through the use of such passwords.

Computer programs, applications, software and data purchased or licensed by or developed for the Company are the property of the Company or its licensors and must not be sold, licensed, released or loaned outside the Company without the prior express permission of the Chief Information Officer and a written agreement approved by the Legal Department. All purchases, leases or licenses by the Company of computer hardware or software or acquisitions of cloud or hosting services must be made pursuant to written agreements approved by the Legal Department.

PROTECTING THE COMPANY'S ASSETS AND INFORMATION

All cast and crew are required to ensure that Company/Production assets and information are protected against improper use, disclosure, theft, compromise or destruction. Cast and crew must:

- Not work around or disable passwords, virus detection or other security protections;
- Not disclose or share usernames, passwords or other security features, or share ID/access cards;
- Not attempt or grant unauthorized access to any Company/Production computer system, device, site or asset;
- Not download programs that may introduce malicious programs/viruses into Company/Production networks or devices;
- Not attempt to access or connect to any Company/Production computer system, device, network, site or other asset from any unauthorized device, location or software;
- Always be mindful about clicking links or opening attachments in emails,

- especially unsolicited emails, as they may be sources of viruses or malware;
- Participate in periodic security awareness training;
- Not copy, move, store or back up Company/Production proprietary or confidential information to:
 - a personally-owned computer or storage device;
 - a personal mobile device that GIS has not approved as a “trusted device”; or
 - an external cloud service that has not been approved by GIS.
- Not use any non-Company system (e.g., cloud-based file-sharing sites) for the transmission or receipt of business-related information or assets unless the system has been approved by GIS.

Cast and crew must immediately [inform GIS](#) of any lost or stolen Company assets or any attempted or actual information security breach or lapse in information security, including malware or phishing attacks, or if they suspect someone is attempting to gain unauthorized access to Company data, resources or systems. In the case of lost or stolen Company assets, cast and crew should also notify Global Security (1-818-560-3220, Global.Security@disney.com or globalsecurity.disney.com/report/).

PRIVACY

Cast and crew must follow the [Global Privacy Policy](#) in handling personal information collected from guests, and may use personal information only for the purpose(s) for which it was collected.

Cast and crew may not collect, use or share guest or employee personal information in ways that violate Company policy or applicable law.

Report suspected violations of these privacy principles to [CORP.Disney.Privacy.Team@disney.com](#).

COMPUTER USAGE AND SECURITY (CONT.)



THIRD PARTIES' USE OF SYSTEMS

Customers, suppliers or other third parties may use Company computer systems only when authorized in writing by a vice president of the business unit with which they are associated. Cast and crew responsible for a contract with any such authorized third party are responsible for ensuring the third party's compliance with this policy.

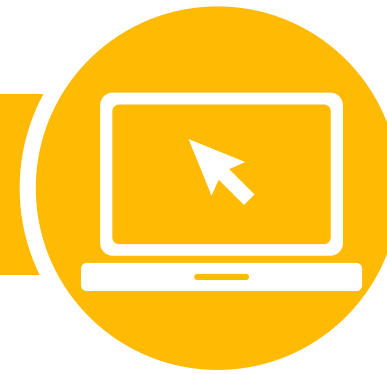
TERMINATED AUTHORIZATION

Cast and crew whose employment has terminated or whose duties no longer require use of Company/Production computer systems must return all Company/Production property and equipment to their immediate supervisor or Unit Production Manager.

Cast and crew responsible for a third-party contract that has terminated must contact their system administrator to coordinate the immediate return of all computer assets to the Company or Production.

Upon completion of their services on the Production, cast and crew must delete from their personal computer all documents and files related to the Production.

USE OF SOCIAL MEDIA



The Company provides certain social media networks and other online publishing and discussion tools to allow cast and crew to communicate and collaborate internally. When using these platforms, or engaging in other online activities that relate to the Company's or Production's business interests, cast and crew must comply with Company/Production policies.

RESPONSIBILITIES WHEN USING COMPANY PLATFORMS

1. When using Company platforms, cast and crew must comply with Company policies, including this Policy Manual and the [Standards of Business Conduct](#).
2. Cast and crew must protect Company/Production confidential or proprietary information. Even on platforms hosted by the Company or limited to Company/Production personnel, cast and crew should use caution to ensure such information is not disclosed beyond those who are authorized to receive it.
3. Company platforms are intended to foster productivity, efficiency and teamwork. Cast and crew should communicate respectfully, avoid unnecessary or unproductive arguments and refrain from discussing sensitive or inflammatory subjects that are not related to work.
4. Cast and crew should respect the privacy of coworkers, guests and others and not post sensitive information about another individual which that individual might wish to remain private.

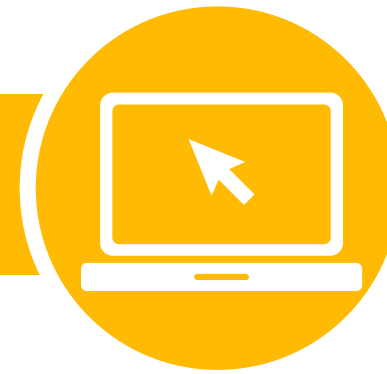
RESPONSIBILITIES WHEN USING OTHER SOCIAL MEDIA

1. Social media is an essential component in attracting, retaining and engaging the Company's customers and audiences. Cast and crew's online activities conducted on non-Company platforms, but which relate to the Production

or the Company's business interests, also are subject to Company policies, including this Policy Manual and the [Standards of Business Conduct](#).

2. Cast and crew should never disclose confidential or proprietary information such as Company/ Production financial information, show performance metrics, show materials, pre-release content or other information that is in the Company's interests to keep confidential. For example, cast and crew should not:
 - Provide information about, or lists of, Company personnel, cast or crew;
 - Post photographs that reveal secret casting information;
 - Post scripts, sides, call sheets, production reports, unapproved pictures of cast or crew, song lyrics, poetry or other copyrighted material that they do not have permission to use;
 - Disclose specific information about filming locations or schedules, plot points, guest stars or personally identifiable information about anyone associated with a production;
 - Post images or video of scenes being shot for production or any publicity materials before they are released by the Company;
 - Take and/or post images, videos and/or audio recordings of talent, cast, crew, props, set designs, or other materials designated as confidential per the [Confidential Information](#) section of this Policy Manual and the [Standards of Business Conduct](#)
 - Blog about a potential merger or partnership; or
 - Post Company earnings information that has not been made public.
3. Cast and crew should not use livestream apps (TikTok, Facebook Live, YouTube, etc.) while on set/location.

USE OF SOCIAL MEDIA (CONT.)



4. Cast and crew should consult with the applicable public relations representative for their segment/Production before posting any behind-the-scenes images.
5. Cast and crew should not use a Company-/Production-issued email address when posting online their personal opinions that are not related to work.
6. Cast and crew may not use usernames for personal social media accounts that refer to the Company or their Production or imply they are speaking on behalf of the Company/Production without prior approval from the applicable public relations representative for their segment/Production.
7. Cast and crew must follow the [Corporate Identity](#) policy, including not infringing on the Company's or a third party's intellectual property rights.
8. In online discussions related to the Company/Production, cast and crew should not imply that they are speaking for the Company/Production (unless they are specifically authorized to speak on behalf of the Company/Production on the particular topic).

REPORTING IMPROPER CONDUCT

Cast and crew with information about an online post that violates these or other Company policies should report it to their immediate supervisor, department head, Unit Production Manager, Human Resources, Employee Relations, or the Guideline at 1-800-699-4870.

For additional guidelines and information, cast and crew should refer to the [Confidential Information](#) policy and relevant segment-specific policies, such as those for talent, reporters and other public-facing cast and crew.

UNAUTHORIZED RECORDINGS



Cast and crew must not record others without their knowledge and consent.

Cast and crew must not record others without their knowledge and consent.

NO RECORDING WITHOUT CONSENT

The Company strives to maintain a culture of trust and respect among cast and crew, and all cast and crew are expected to guard against the intentional or unintentional disclosure of Company confidential information. In addition, it is illegal in some states (including California and Florida) to record conversations without the consent of all parties to the conversation.

For these reasons, unless the recording is authorized as part of the cast or crew member's work, the Company prohibits cast and crew from recording their coworkers (or others they encounter in the course of their employment) at any time, without prior permission from the person being recorded. This prohibition applies, but is not limited, to interactions in person as well as those by phone or other mobile device, to audio and/or video recording, and to recordings made by cameras, phones, or "wearable" devices such as computer-enabled watches or glasses.

RESTRICTIONS ON RECORDING DEVICES

The Company/Production may prohibit the possession of any recording device at certain Company/Production events and in certain areas of Company property or Production locations and otherwise reserves the right to restrict the possession or use of recording devices on Company property or Production locations.

CREW TIMEKEEPING



The following applies to crew members not working under a collective bargaining agreement. Crew members working under a collective bargaining agreement should refer to the terms of that agreement. Crew members also should refer to their deal memo, as applicable, for any additional provisions regarding timecards, rest and meal periods, and overtime pay.

RECORDING TIME

Crew members must accurately record on their timecard all actual time worked (including wherever and whenever the work is performed), all paid time off, and unpaid time off. Crew members are responsible for reviewing their timecards on a daily basis to ensure that they accurately reflect their actual start and end times, meal periods taken, and any overtime worked. Crew members must sign their timecards and turn them in to production accounting at the end of their work week. Crew members who falsify time records or record time for another crew member will be subject to termination. Supervisors who approve time records they know to be inaccurate or who otherwise cause or direct another crew member to submit inaccurate time records will be subject to discipline, which may be termination.

OVERTIME PAY

The Company/Production pays overtime to eligible crew members in accordance with applicable law. Crew members must obtain approval from their supervisor before working overtime (which includes work before their scheduled day begins or continuing to work after their scheduled work day ends). All overtime hours worked must be properly recorded on the timecard. Crew members may not work “off the clock” to avoid having to record overtime.

REST BREAKS AND MEAL PERIODS

The Company/Production provides eligible crew members with periodic paid rest breaks and unpaid meal periods during designated working hours in accordance with applicable law. The actual schedule of rest breaks and meal periods will be determined by the crew member’s supervisor. Crew members should be prepared to resume working promptly at the end of their rest breaks and meal periods.

CAST AND CREW DATA AND PERSONNEL RECORDS



The Company collects various types of personal information and input from cast and crew, and maintains confidential personnel records related to their employment. The Company takes appropriate steps to secure that information and prevent unauthorized disclosure.

“Personal information” can include a cast or crew member’s name, contact details, date and place of birth, Social Security Number, dependent information, medical information and other personal information related to accommodations or time off requests.

USE AND DISCLOSURE OF PERSONAL INFORMATION

The Company uses personal information for various reasons, including administering compensation, benefits and leaves of absence, if applicable. The Company limits access to cast and crew personal information to only those authorized staff members with a business need to know. The Company only shares personal information outside the Company in limited circumstances, such as:

- disclosure to third parties, such as payroll servicers, who provide employment-related services, subject to restrictions that they may not use it for purposes other than the services they provide
- disclosure in response to a cast or crew member’s request, such as to verify employment
- where legally required, such as in response to a subpoena, or in accordance with a collective bargaining agreement or request from a government agency
- to protect the Company’s rights and interests

CAST AND CREW RESPONSIBILITIES

Cast and crew with access to personal information share in the responsibility to protect that information. Cast and crew must be familiar with and follow Company rules and procedures relating to privacy and data protection, including those contained in the [Computer Usage and Security Policy](#).

Cast and crew are responsible for keeping their personal information up-to-date, including home address, phone numbers, emergency contacts, marital status and dependents. To view or update personal information, please contact the Unit Production Manager, Human Resources or Employee Relations.

FAMILY AND MEDICAL LEAVE ACT



This policy outlines the primary provisions of the Family and Medical Leave Act (FMLA).

The Family and Medical Leave Act (FMLA) provides that eligible employees may take up to 12 weeks of unpaid leave (at one time or intermittently) within a 12-month period for any of the following reasons:

- incapacity related to pregnancy or child birth;
- to care for the employee's child after birth or placement for adoption or foster care;
- to care for the employee's spouse (including same-sex spouse), child or parent, who has a serious health condition; or
- a serious health condition that makes the employee unable to work.

The FMLA also allows employees to take up to 12 weeks of unpaid leave to address certain needs when a family member is called to active military duty, and up to 26 weeks of unpaid leave within a 12-month period to care for certain family service members with a serious injury or illness. Refer to the [Military-Related Leaves](#) policy for additional information.

The Company also complies with applicable state laws related to family and medical leaves. For example, leave taken for a pregnancy-related medical disability, up to four months, does not count as leave under the California Family Rights Act. Cast and crew in New York should contact Human Resources or Employee Relations for information about the New York Paid Family Leave program.

ELIGIBILITY

Cast and crew are eligible for leave under the FMLA after they have worked at least 12 months and have worked at least 1250 hours during the 12 months preceding the leave, and if they work at a location with 50 or more employees within a 75-mile radius. Cast and crew should contact their Production team or Unit Production Manager for the appropriate contact for questions about eligibility.

Cast and crew must provide 30 days' advance notice of the need to take FMLA leave when the need is foreseeable. If 30 days' notice is not possible, they must provide notice as soon as practicable. Cast and crew must provide sufficient information so the Company can determine if the leave qualifies for FMLA protection and the anticipated timing and duration of the leave.

BENEFITS AND RETURN TO WORK

Company health care coverage, where applicable, continues during an FMLA leave, subject to the cast or crew member's payment of applicable contributions to premiums.

Cast and crew returning from FMLA leave are entitled to reinstatement to their original position or to an equivalent position with equivalent pay, benefits, and other terms and conditions of employment, unless their position is no longer available for reasons unrelated to the leave.

FAMILY AND MEDICAL LEAVE ACT (CONT.)



LEGAL RIGHTS UNDER THE FMLA

The FMLA prohibits the Company from interfering with cast and crew's exercise of FMLA rights, or from discriminating against or terminating someone for opposing practices the FMLA makes unlawful or being involved in any FMLA-related proceeding.

Cast and crew with concerns that they have been discriminated or retaliated against because they took FMLA leave should contact Human Resources or Employee Relations. Cast and crew may enforce FMLA rights by filing a complaint with the U.S. Department of Labor or a private lawsuit. The FMLA does not affect any federal or state discrimination laws, or supersede any state or local law or collective bargaining agreement providing greater leave rights.

MILITARY-RELATED LEAVES



The Company provides military-related leaves of absence to support cast and crew and their family members who serve in the military.

The Company supports cast and crew and their family members who serve in the military and provides military-related leaves of absence consistent with applicable law.

Cast and crew should contact their Production team or Unit Production Manager for the appropriate contact for questions regarding military-related leaves.

MILITARY LEAVE OF ABSENCE

Cast and crew who are members of the uniformed services, including the Reserves and National Guard, are eligible for leaves of absence to take part in a variety of military duties, including training, active military service, examinations to determine fitness for active duty and the performance of funeral honors duty. Subject to certain exceptions provided by law, cast and crew may take up to five years of cumulative leave under this policy.

Cast and crew who need to take a military leave of absence should provide advance notice to their supervisor whenever possible. Cast and crew may be requested to provide a copy of their military orders in connection with a military leave request.

The Company/Production will comply with applicable law regarding re-employment of cast and crew returning from a military leave.

MILITARY CAREGIVER LEAVE

If a cast or crew member's spouse, domestic partner, child, parent, or "next of kin" incurs a serious illness or injury while serving on active military duty in the uniformed services, Reserves or National Guard, the Company provides the cast or crew member up to 26 weeks of unpaid leave to care for that family member.

Cast and crew should request military caregiver leave at least thirty days before the start of their leave, or as soon as practicable. See the [Family and Medical Leave Act](#) policy for additional information related to benefits and return to work.

QUALIFYING EXIGENCY LEAVE

If a cast or crew member's spouse, domestic partner, child or parent is a member of the uniformed services, Reserves or National Guard who is on or called to active duty in a foreign country, the Company will provide the cast or crew member up to 12 weeks of unpaid leave to address certain urgent, non-medical needs related to the service or call-up, including:

- Managing issues raised by short-notice deployment (i.e., deployment on seven or fewer days' notice)
- Attending military events and related activities
- Childcare and school activities
- Care for the military member's parent who is not capable of self-care

MILITARY-RELATED LEAVES

(CONT.)



- Making or updating financial and legal arrangements to address the family member's absence
- Attending non-medical counseling
- Spending time (up to five days) with a family member who is on short-term temporary rest and recuperation leave during deployment
- Attending to certain post-deployment activities, including attending arrival ceremonies, reintegration briefings and events, and other official ceremonies

Cast and crew should provide notice of the need for qualifying exigency leave as soon as practicable. Cast and crew may be requested to provide a copy of their family member's military orders in connection with a qualifying exigency leave request. See the [Family and Medical Leave Act](#) policy for additional information related to benefits and return to work.

New York's Paid Family Leave program also extends to qualifying exigency leave. Cast and crew in New York should contact Human Resources or Employee Relations for information about that program.

BEREAVEMENT LEAVE



The Company complies with any applicable state or local bereavement leave law requirements. Cast and crew can use available sick leave (if any) to receive compensation during any periods of unpaid bereavement leave provided by state or local law.

DISABILITY ACCOMMODATION



Cast and crew seeking an accommodation should contact Human Resources or Employee Relations.

The Company provides reasonable accommodation to cast and crew with disabilities.

REASONABLE ACCOMMODATION

In keeping with the Company's [Equal Employment Opportunity](#) policy, the Company will accommodate a cast or crew member's known physical or mental disability when it determines an accommodation is reasonable and will enable the individual to perform the essential functions of their position. Exceptions may be made where an accommodation would create an undue hardship for the Company, or where otherwise consistent with law.

REQUESTING AN ACCOMMODATION

Cast and crew who need an accommodation for a physical or mental condition that is interfering with job performance (including accommodations for reasons related to pregnancy, childbirth, or related medical conditions, including lactation) should promptly notify Human Resources or Employee Relations. Although accommodations are determined on a case-by-case basis, generally the Company will require information from the cast or crew member's Health Care Provider confirming the existence and anticipated duration of the disabling condition and identifying limitations caused by the condition. Typically, the Company will engage with the cast or crew member in an interactive process to assess how the condition limits the individual in the workplace, and to

identify what accommodations, if any, are feasible. Cast and crew have an obligation to cooperate with the Company in this process.

OTHER WORKPLACE ACCOMMODATIONS

Even where not required by law, the Company will consider other cast and crew requests for workplace accommodations, including requests related to a temporary injury or requests to address ergonomic needs.

NO HARASSMENT, DISCRIMINATION OR RETALIATION

The Company prohibits harassment, discrimination and retaliation against any cast or crew member or job applicant because of an actual or perceived disability or for requesting an accommodation. Individuals who believe this section has been violated should follow the procedures outlined in the [Speak Up](#) policy.

RELIGIOUS ACCOMMODATION



Cast and crew seeking a religious accommodation should contact Human Resources or Employee Relations.

The Company respects the religious diversity of cast and crew and prohibits discrimination based on religion.

In keeping with these principles, the Company provides, on request, reasonable accommodations for cast and crew to exercise their sincerely-held religious beliefs, unless doing so would create an undue hardship for the Company.

REQUESTING AN ACCOMMODATION

Cast and crew whose sincerely-held religious beliefs, practices or observances conflict with work requirements should notify Human Resources or Employee Relations. An accommodation request may trigger an interactive process to assess the cast or crew member's specific individual needs, and to identify what accommodations, if any, are feasible. Cast and crew have an obligation to cooperate with the Company in this process.

NO HARASSMENT, DISCRIMINATION OR RETALIATION

The Company prohibits harassment, discrimination and retaliation against any cast and crew or job applicant because of their actual or perceived religion or for requesting a religious accommodation. Individuals who believe this section has been violated should follow the procedures outlined in the [Speak Up](#) policy.

BREAKS FOR NURSING CAST AND CREW



The Company accommodates nursing cast and crew at work.

The Company fosters a work environment that supports family life. As part of those efforts, the Company accommodates nursing cast and crew who wish to express breast milk during their work day.

LOCATION AND TIMING

Cast and crew who request breaks under this policy will be provided the use of a private space that is shielded from view and free from intrusion, other than a bathroom or toilet stall, for this purpose. This area may be the place where the individual normally works if there is adequate privacy. Cast and crew should work with their supervisor to find an appropriate private space. Cast and crew are responsible for proper storage of their expressed milk.

Hourly, weekly and daily cast and crew are encouraged to use their regular scheduled lunch or break times, if possible. Any additional time required should be scheduled between the individual and their supervisor based on the individual's work schedule and business needs.

Cast and crew are encouraged to contact Human Resources before they return to work to identify their need for a lactation area or to make any other arrangements necessary under this policy.

REQUESTS FOR BREAKS

Cast and crew should make requests under this policy to their supervisor, on-site supervisor or Human Resources. The Company will respond to these requests within five business days, if not before, and will work with the individual to determine the appropriate break period(s) and location.

NO RETALIATION

The Company will not tolerate retaliation against a cast or crew member who requests or takes breaks in accordance with this policy.

LEGAL COMPLIANCE

The Company also complies with applicable state and local requirements related to lactation breaks.

SAFETY, HEALTH AND ACCIDENT PREVENTION



The safety and health of our cast and crew is paramount. The Company strives to provide a safe work environment for all cast and crew and complies with all applicable health and safety laws and regulations.

“SAFETY BEGINS WITH ME”

Safety is the responsibility of everyone. It is not just a priority, but a shared core value. The Company’s vision is to foster a work environment where no one gets hurt. This requires personal ownership from each and every cast and crew member—a commitment to personal safety, an understanding of how decisions impact the safety of others, and encouraging coworkers to work safely.

A key component to achieving the Company’s safety vision is developing cast and crew awareness of hazards they may encounter. Supervisors, cast and crew need to be aware of all potential hazards in their areas and how to avoid or safely interact with them. This includes following all instructions and applicable health and safety procedures (including procedures issued on a temporary basis to address emergency or exigent circumstances), not undertaking any task without proper training and necessary protective equipment and safety devices, and inspecting and maintaining equipment in good condition.

All cast and crew are responsible for taking appropriate action to correct unsafe and unhealthful conditions. Cast and crew must promptly report any potential unsafe conditions or safety hazards to their immediate supervisor, on-site supervisor, Unit Production Manager or other appropriate manager. Cast and crew may also contact the Safety Department at 1-818-560-1726. Concerns may be reported

anonymously. Cast and crew will not be penalized in any way for reporting unsafe conditions and/or practices.

WORK-RELATED INCIDENTS

Cast and crew must report to their manager or on-site supervisor in a timely manner any injury or illness that occurs on the job or arises in the course of their duties. For certain injuries or illnesses, cast and crew may be eligible to receive workers’ compensation benefits under applicable state law. The cast or crew member and their supervisor are responsible for promptly reporting work-related illnesses or injuries to the Medical Department or location medic.

Cast and crew must report all accidents, no matter how minor, promptly to their immediate supervisor, Human Resources, Medical Department (if applicable) or Security. If a life-threatening or emergency situation exists, cast and crew should call 911 and seek appropriate medical attention, and then follow up with their immediate supervisor as soon as possible. If medical treatment is needed after hours, cast and crew should seek care and then notify management as soon as possible.

VEHICLE AND PEDESTRIAN SAFETY

Cast and crew are expected to observe safe driving practices while operating a vehicle in the performance of their jobs (whether the vehicle is personally owned or provided by the Company or Production), which includes only making

SAFETY, HEALTH AND ACCIDENT PREVENTION (CONT.)



telephone calls or sending messages if it can be accomplished without taking one's hands from the wheel or focus from the road. Cast and crew must comply with any additional segment guidelines or applicable laws that impose greater restrictions on the use of communications devices while operating a vehicle.

When driving on Company property or Production locations, including in parking lots and parking structures, cast and crew are expected to drive safely, yield to pedestrians, and observe all speed limits and other traffic laws and signs.

Cast and crew on foot are encouraged to focus on their surroundings and avoid distractions, such as mobile phone use, no matter the location—office hallways, stairs, parking lots, crosswalks or roadways.

WELLNESS

For cast and crew to be safe on the job, they must first be healthy. The Company strives to be a place of well-being where cast and crew can be their healthiest, most high-performing selves. Many resources are available to help cast and crew improve their well-being and perform their roles safely. Additionally, cast and crew are encouraged to participate in improving their personal health and reducing health risks through wellness programs that may be offered.

SECURITY



Cast and crew should report any security concerns to their local security team or to Global Security at 1-818-560-3220 or globalsecurity.disney.com/production-security.

The safety and security of cast and crew is vitally important. To help “Protect the Magic,” cast and crew are encouraged to immediately report all security concerns, including threats, extortion, thefts, inappropriate access, or any other suspicious activity, to their local security team or Global Security at 1-818-560-3220 or globalsecurity.disney.com/production-security. In other words, “If you see something, say something.”

WORKPLACE VIOLENCE

Cast and crew may not commit or threaten any act of violence, or harass, intimidate or coerce any cast or crew member or other person in the course of the Company’s business. The Company will promptly respond to any known acts or threats of workplace violence. All such acts and threats will be taken seriously and are grounds for disciplinary action, which may be termination.

Possessing a firearm, ammunition or other dangerous weapons on Company premises or Production locations, at Company/Production events, or wherever cast and crew perform work, is strictly prohibited unless authorized as part of the individual’s work.

Cast and crew who have obtained an active restraining or protective order are strongly encouraged to consult with Global Security about the matter. This information would be used to help make a plan to increase workplace safety.

In the event of a workplace violence incident or a threat to commit **immediate** bodily harm to another person, cast

and crew should call 911 (U.S. only). Cast and crew who become aware of a **non-immediate** threat in the workplace should contact Security, Human Resources, their immediate supervisor, on-site supervisor, Unit Production Manager or the Guideline. Any cast or crew member in a position of authority or management receiving any such reports must immediately contact Security, Human Resources or Employee Relations.

EMERGENCY PREPAREDNESS

All cast and crew are expected to prepare for and help respond to any crisis affecting the Company and its cast and crew. At a minimum, cast and crew are expected to participate in emergency drills, know emergency exits and reunification areas, and follow leadership and crisis management instructions during an emergency incident. For more information, contact Crisis Management at Global.Crisis.Management@Disney.com.

COMPANY IDENTIFICATION CARDS

While on Company premises or Production locations, cast and crew, contractors and visitors must wear their cast and crew Identification card (“ID”) or visitor access badge where it is clearly visible, unless their role requires otherwise. Cast and crew may not give their ID to another person to use and may not use another person’s ID. Cast and crew should immediately notify Security if their ID card is lost or stolen so that access can be shut down. For more information email corp.production.security@disney.com.

DRUGS AND ALCOHOL



Cast and crew may not be under the influence of drugs or alcohol while working.

The Company is committed to providing a safe and productive work environment and prohibits cast and crew from being under the influence of drugs or alcohol while working.

GENERAL RULES

Cast and crew must not report to or remain at work, or otherwise perform work for the Company/Production, while under the influence of alcohol or drugs. The unlawful manufacture, distribution, dispensation, possession or use of drugs is prohibited in the workplace, including on Company property or Production locations, in any Company-/Production-owned, leased or rented vehicle, or while engaged in Company/Production business. Violators will be subject to disciplinary action, which may be termination.

Cast and crew are also expected to comply with any additional guidelines contained in the start packet for their specific Production.

PRESCRIPTION / OVER-THE-COUNTER DRUGS

Cast and crew who are lawfully using prescription or over-the-counter drugs that they believe may impair their ability to safely perform their job should discuss the issue with Human Resources or Employee Relations before starting or resuming work.

MARIJUANA

Although several states have legalized marijuana for medicinal and/or recreational use under state law, it remains prohibited under Federal law and under Company policy. Marijuana use or possession is not permitted on Company property or Production locations at any time.

Cast and crew are advised that use of CBD or any hemp products is at their own risk. Cast and crew who test positive for THC as a result of a Company drug test will be subject to discipline in accordance with the Company's policies.

NON-SMOKING POLICY



Smoking is prohibited, except in specifically-designated and posted “Smoking Areas.”

As part of a broader strategy to improve cast and crew health, it is the policy of the Company to limit exposure to secondhand smoke for its employees, cast and crew, clients, contractors, visitors and guests, all of whom are required to comply with this policy.

Smoking in any form, including the use of tobacco products (pipes, cigars and cigarettes) or “vaping” with e-cigarettes, shall only be permitted in areas specifically designated and posted as “Smoking Areas.” Those who smoke must use the provided receptacles in order to maintain Company and Production facilities. Seating in “Smoking Areas” shall be provided, if needed and requested.

Smoking marijuana is not permitted at any time on Company property or Production locations, even in designated smoking areas.

In any area smoking is prohibited by law, it is also prohibited by Company policy (e.g., adjacent to fuel storage and flammable/combustible liquid dispensing activities).

Smoking is prohibited at all times in shuttles, carpool vans, Production-related vehicles (including golf carts) and any other multiple-occupant, Company-/Production-owned vehicle.

Smoking is prohibited inside any indoor facilities owned or leased by the Company or Production.

RESOURCES

To voice a concern that a policy has been violated, call the Guideline at 1-800-699-4870.

THE GUIDELINE

- Concerns regarding accounting, internal accounting controls or auditing matters
- Guidance on any business conduct-related issue
- Report suspected unethical/illegal conduct or policy violations
- Anonymous reporting option

Online: www.disneyguideline.com

Telephone (24/7): 1-800-699-4870

HUMAN RESOURCES/ EMPLOYEE RELATIONS

- Any cast and crew concerns or HR matters
- Questions about policies in this Policy Manual or possible policy violations
- Accommodation requests based on disability or religious beliefs
- As necessary, HR and Employee Relations professionals will ensure appropriate members of the HR/Employee Relations team are involved.

Contact information varies by segment/location. Ask your supervisor or Unit Production Manager for specific contact information.

	For:	Contact:
Other useful contacts	Company-related legal issues, questions or concerns	Legal Department: 1-818-560-1301
	Notification of compromised devices or information security breaches, or questions about appropriate use of Company computer systems	Global Information Security/IT Support Center: 1-866-534-7639; Web: https://infosec.disney.com/ ; Email: infosec.FIRE@disney.com
	Reporting potential unsafe conditions or safety hazards	Safety Department: 1-818-560-1726
	Reporting security concerns, including thefts, lost or stolen devices, threats, suspicious activity or pre-public IP/content breaches	Contact your Production security representative and/or TWDC Global Security: 1-818-560-3220; Web: https://globalsecurity.disney.com/production-security ; Email: corp.production.security@disney.com
	Questions or concerns regarding the Company's accounting, internal accounting controls, auditing matters or the Conflicts of Interest and Gift policies	Management Audit Department: CORP.Disney.Management.Audit@disney.com

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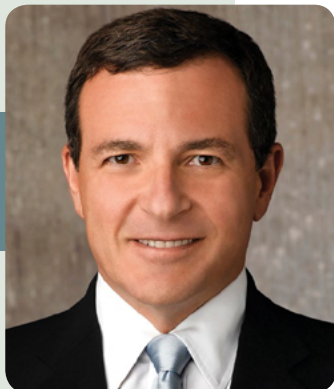
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The **WALT DISNEY** Company and Affiliated Companies

STANDARDS OF BUSINESS CONDUCT



An Unparalleled Commitment ...

Dear Fellow Disney Team Member,

Throughout the years, we have earned the trust of guests, audiences, consumers and shareholders because of our commitment to high standards in everything we do, everywhere we operate. Integrity, honesty, trust, respect, playing by the rules, and teamwork – these define not only the operating principles of our Company, but also the spirit of our diverse global workforce and how we function.

Our Standards of Business Conduct provide the information, the resources and the tools necessary to conduct ourselves ethically and in compliance with the law. As a Cast Member or employee you are expected to read and be familiar with the Standards and to use them to guide the way you act.

Always remember that in every interaction, you are the face of our Company. Act responsibly in all of your professional relationships, in a manner consistent with the high standards we set for our business conduct, and speak up whenever you have a question or concern. As we continue to create Disney Magic, make sure your actions reflect your pride in yourself, those you work with and the Company.

Robert A. Iger

Speak Up

You have the right and the responsibility to protect our Company from conduct that can threaten our day-to-day operations, our reputation and our future growth.

The Guideline

is a resource for employees and Cast Members to 1) report questionable activities – including questionable accounting or auditing matters; 2) report complaints regarding the Company's accounting, internal accounting controls or auditing matters; 3) ask for guidance on any business conduct-related issue; or 4) make the Company aware of any suspected unethical or illegal conduct, or violation of our Standards of Business Conduct or of any other Company policies.

Cast Members and employees in the United States and Canada, may report online:

www.disneyguideline.com

Or call anytime, day or night:

800-699-4870

Concerns are addressed promptly and fairly. Our Company does not tolerate any form of retaliation against anyone who makes a good faith report of potential misconduct or helps with an investigation. Reports are accepted anonymously where permitted by law.

Note that all references in this document to the Guideline refer to the information on this page.

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1

Integrity: Our Standards why

We Have Standards of Business Conduct

The connection we share with people around the world through the content, entertainment and experiences we offer is a privilege, one we must never take for granted. We recognize that our continued success depends upon a commitment to conduct business with honesty, integrity and in compliance with the law everywhere we operate.

Our Standards of Business Conduct (or “Standards”) are a reflection of that commitment and provide you with the information you need to do the right thing on the job and preserve the reputation we have earned as an ethical company.

Keep in mind, no document can address every situation you may possibly face in your everyday work. We rely on you to use these Standards as well as your good judgment to guide your behavior and to ask questions if you are ever unsure of the proper course of action.

For more information regarding the Company’s ethics and compliance policies, including the Standards of Business Conduct, you may visit disneycompliance.com

Who is Required to Follow the Standards

Our Standards apply to all Cast Members and employees (including temporary, part-time and seasonal employees) as well as others who are identified with our Company as acting on its behalf.

What the Standards Mean for You

As a Cast Member or employee, you have a responsibility to:

- Act with integrity and honesty on the job.
- Comply with all applicable laws and regulations in performing your duties.
- Be familiar with the Standards, follow them at all times and seek help when you have a question.
- Share concerns about any conduct that violates our Standards.

We are committed to compliance with our Standards. Anyone who violates them is subject to disciplinary action, up to and including termination. Remember, one of the best resources for solving an ethical dilemma is your conscience. If an action you’re contemplating feels dishonest, unethical or illegal, it probably is.

If you are a supervisor, you have a greater level of responsibility. We look to you to model ethical behavior and promote

“Yesterday, my supervisor asked me to do something that violates our Standards. I’m not sure what to do”

You have a responsibility to comply with our Standards, even if your supervisor asks you to do otherwise. No one – not even your supervisor – has the authority to tell you to do something illegal or unethical. Talk to someone else in management or contact your Human Resources representative, The Guideline or the Legal department for help.

Not sure? Ask yourself:

- Is it legal?
- Does it comply with our Standards?
- What would someone I respect say about my actions?

a workplace where Cast Members and employees feel comfortable coming forward with concerns and questions. Our Company is committed to open, free and effective channels of communication, so promote an “open door” policy, be a good listener and work to earn the trust of your co-workers.

Make sure you are familiar not only with the Standards but also with the specific laws and policies that apply to you and your team. Our Standards may complement other policies, procedures and our employment agreements. If you or anyone on your team encounters an inconsistency or conflict, seek the help of your supervisor or Human Resources representative or [The Guideline](#).

Asking Questions, Sharing Concerns: The Guideline

One of our greatest assets is our reputation. We’re known for operating with high ethical standards everywhere we do business. Our continued success depends, in part, on your commitment to doing the right thing and speaking up if you see or suspect someone is violating our Standards.

You have the right and the responsibility to protect our Company from conduct that can threaten our day-to-day operations, our reputation and our future growth. If you ever have questions about our Standards

or Company policies or if you see or suspect a violation, we rely on you to share them with your supervisor, your Human Resources representative or [The Guideline](#).

Available anytime night or day, The Guideline is operated by an independent, third-party company located in the United States and allows you to submit an online report or share your concerns in your own language with a professional interview specialist. Reports are accepted anonymously where permitted by law.

Regardless of whom you contact, you may be assured that your concerns will be addressed promptly and fairly. Our Company does not tolerate any form of retaliation (including separation, demotion, suspension or loss of benefits) against anyone who makes a [good faith](#) report of potential misconduct or helps with an investigation. We want you to be free to ask questions and raise issues without fear of retaliation, secure in the knowledge that you did the right thing in coming forward.

Sometimes, it may seem easier to keep quiet or look the other way when someone violates our Standards, but doing nothing can, in itself, result in serious consequences. When you speak up about unethical and illegal behavior, you’re saying that an honest and ethical workplace matters to you.

The Guideline offers a way for you to:

- Share concerns about questionable activities
- Report known or suspected acts of financial misconduct or other violations of our Standards
- Ask for guidance on any business conduct-related issue

“I have an issue that I’d like to discuss with someone in Human Resources, but my supervisor told me that all issues should be discussed with her first. Is that right?”

It’s a good idea to discuss issues and concerns with your supervisor first, but if, in a particular situation, you feel uncomfortable doing so, you are free to contact another member of management, your Human Resources representative or The Guideline.





2

Trust: Our Commitment to Guests and Customers

We are committed to our guests and our customers – they are the reason we are here.

Safety

Promoting the health, safety and welfare of our guests and customers is a critical responsibility – one that should never be ignored, minimized or sacrificed. All of us share the responsibility of helping to make guests safe and secure. Do your part to meet our high standards, whether you are designing, building, operating or maintaining our Company attractions, products or facilities. Remember, the commitment you make preserves not only the safety of our guests and customers but also a safe workplace for your fellow Cast Members and employees.

Quality

We are recognized as providers of high-quality content, entertainment and experiences of all kinds, including films, television programs, news and information, theme park attractions and resorts, online experiences, consumer products and stores. Each of us has a responsibility to build quality into

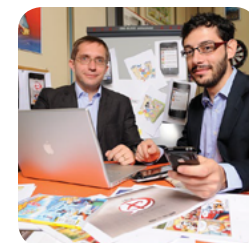
every product and service we deliver and every interaction we share. That means being courteous, knowledgeable and passionate about providing a high-quality experience to all of our guests and customers. It also means creating products and services that we are proud to identify as ours.

Protecting Privacy

In compliance with data privacy laws, we work to keep personal data private. Personal data includes any information that directly or indirectly relates to a person; for example office e-mail addresses, telephone numbers, images, credit card information, etc. You are expected to follow all Company policies as they relate to handling and retention of the information.

If you work with personal information as part of your job, use it only for legitimate business reasons and in compliance with all applicable privacy notices or policies. There are strict rules about collection of personal information for marketing purposes – if you're not sure what is permissible, ask. Breaches of data privacy can expose you and the Company to legal penalties and harm the reputation we've earned as an ethical company.

"... build quality into every product and service we deliver and every interaction we share."





Be sensitive when sharing personal information. Personal information regarding guests or customers should never be disclosed to anyone, except as permitted by law and by the Company. Before sharing personal information with anyone – inside or outside of the Company – make sure the recipient is authorized to receive the information, that he or she knows the information is confidential and understands how the information is to be used or disseminated and that it is legally permitted to share that information. You should contact the [Legal department](#) if you have any questions.

Limit the amount of information shared to only what is needed to accomplish the business requirement. Be sure to obtain a confidentiality or privacy agreement, if required, before disclosing personal or confidential information to individuals outside of our Company.

Want to know more?

[Information Security Policies and Standards](#)





3

Teamwork: Our Commitment to Each Other

Fairness, Dignity and Respect

Our Cast Members and employees are the cornerstone of our magic. We are committed to a work environment where everyone is afforded the dignity and respect that they deserve. We don't allow any form of harassment or discrimination on the basis of race, religion, color, sex, sexual orientation, gender identification, national origin, age, marital status, covered veteran status, disability, pregnancy or any other basis prohibited by applicable law. If you see or suspect any violation, or feel you, yourself, are a victim of harassment or discrimination, promptly [report it](#).

For more information, please consult the [Employee Policy Manual](#) or, if you work for Pixar, the Pixar Employee Handbook.

We promote professional development. We are also committed to offering opportunities for Cast Members and employees to develop and advance professionally, in a manner consistent with their abilities. Any decisions related to hiring, evaluating performance, promoting, disciplining or terminating

Cast Members and employees are made fairly, with discretion and respect for privacy.

A Diverse Workforce

Each of us is a valued member of the team. We embrace our multicultural workforce and tap the unique talents and potential of every Cast Member and employee to create superior products and services. To foster diversity, we:

- Seek to attract and develop a workforce that reflects the guests and customers, business partners, shareholders, labor markets and communities in which we do business.
- Maintain a workplace that offers open opportunities to all, recognizing individuals for their experience, performance, training, work history and potential.

"I overheard a co-worker use insulting language when referring to someone on our team. What should I do?"

Language that is disrespectful of a person's race, religion, color, sex or any other protected class doesn't fit in a workplace that values diversity. If you feel comfortable doing so, say something to your co-worker to express your concern. If you don't, speak to your supervisor, your Human Resources representative or call The Guideline.

"Each of us is a valued member of the team."





4

Honesty: Our Commitment to the Company and our Shareholders

Protecting our reputation requires a commitment to truth and high standards in everything we do.

Conflicts of Interest

Our business is built on public trust and confidence and an expectation by guests and customers that they can depend on our products and services. To deliver our very best, each of us has an obligation to make objective decisions on behalf of the Company and avoid situations where a conflict (or apparent conflict) exists between the Company's interests and our own, personal interests.

It's impossible to list all of the situations that could present a potential [conflict of interest](#), but there are certain situations where conflicts often arise. It's important that you are familiar with these situations, recognize a potential conflict when you see one and take the appropriate action.

Doing business with family can present a conflict of interest. Even if you work to remain objective in your business dealings, the fact that you share a personal relationship or financial interest with someone or a company can create the appearance of a [conflict of interest](#). As a result, you may not conduct business on behalf of our Company with a member of your [immediate family](#) or with a company in which you or a member of your

immediate family has a financial interest, which is defined as any paid relationship or arrangement (for example as an agent, representative, employee, promoter, consultant or "finder") with a business or any ownership interest (of stock, partnership, interest, etc.), other than not in excess of 5 percent of a publicly-traded entity unless you obtain approval from the [Management Audit department](#).

What about situations where you are not actually conducting business yourself with a member of your immediate family or a company owned by an immediate family member, but you are in a position to influence or affect our Company's business relationship with that person or company? If you or a member of your immediate family has a [material financial interest](#) in a company that is or wants to do business with our Company, you must disclose that information to the [Management Audit department](#) as soon as you become aware of it.

Don't ask others to do something you are prohibited from doing. If you are a supervisor, you may not allow (or direct) any employees you directly supervise to conduct business with you or members of your [immediate family](#) or companies in which your immediate family has a [financial interest](#), unless approval is obtained from the [Management Audit department](#).

In situations where employees you indirectly supervise are conducting or intending to conduct business with a member of your

"When my department hosts special events, my team puts me in charge of catering because my daughter-in-law owns a local restaurant that provides great food at a discount. Is that okay?"

No, even if the restaurant offers a great meal at a great price, selecting your daughter-in-law's business without prior approval from the Management Audit department may give the appearance that we chose her business because of your family connection.

“To make some extra money, I’ve started my own Internet business on my home computer. Is that okay?”

It’s always best to check with your supervisor but, in general, as long as the business doesn’t compete with the Company’s business, use Company assets or interfere with your ability to do your job, it is acceptable.

immediate family or company in which you or your immediate family has a financial interest, you must disclose the situation to the Management Audit department as soon as you become aware of it.

Be careful in working for or investing in other companies. Working for or having a [material financial interest](#) in a company that competes with our Company can present a conflict. A conflict can also arise if you work for a company that has no association with ours but your work interferes with the time, talent and energy you bring to the work you do for our Company.

Therefore, if you are considering investing in such a company, starting your own business or accepting a second job, talk to your supervisor to make sure there is no conflict. If you have questions about investments and possible conflicts, contact the [Management Audit department](#).

Are you involved in decisions regarding our Company and a financial institution? If you play a role in establishing or managing a relationship between our Company and any financial institution, you may not enter into any transaction with – or receive any benefit or opportunity from – the institution that isn’t generally available to other customers or clients. This policy also applies to members of your [immediate family](#) or a business where you or your family have a [material financial interest](#).

Gifts, Entertainment and Hospitality

The exchange of gifts is often a common business practice and one that can build goodwill among companies with which we do business, but when gift-giving becomes lavish or frequent, it can suggest something improper. That’s why we have policies in place to help you determine what’s appropriate – and what’s not – in terms of giving or receiving gifts.

Our policies are designed to:

- Comply with the law and, when giving a gift, comply with the company policies of the person receiving the gift.
- Make sure our success is based on the merits of our products and services, not gifts we give or receive.
- Promote transparency – we don’t engage in any activity that would compromise our professional judgment or suggest favorable or preferential treatment.

What is a “Gift”? A gift is [anything of value](#). It includes tangible items such as jewelry and art, but also intangible items such as discounts, services, loans, favors, special privileges, advantages, benefits and rights that are not available to the general public. A “gift” also includes meals, entertainment, hospitality, vacations, trips, use of vacation homes, tickets

to sporting or music events, golf outings, vendor familiarization trips and use of recreational facilities. Under no circumstances should you ever solicit a gift from any person or company that is doing – or seeks to do – business with us unless it is for charitable purposes and no employee or Cast Member receives any benefit. Note that meals, entertainment and hospitality may also qualify as a gift.



"... Disney's success is based on the merits of our products and services, not gifts we give or receive."

Giving gifts: What's our policy?

Offering gifts to win or keep business is unethical and, in many cases, illegal. Be sure you understand the rules and ask questions

if you're ever unsure about whether a particular gift is okay. In general, you should never give a gift that:

- Is (or could reasonably be perceived to be) an inducement to do business with our Company
- Would be considered excessive under the circumstances
- Would violate our Company policies or those of the recipient
- Would be contrary to the interests of our Company
- Is, in fact, different from what you reported either to us or to others

In addition, if you are located in the United Kingdom, work for a Disney entity that is subject to U.K. law, or are otherwise subject to U.K. law you must obtain approval

from your immediate manager before giving any gift in connection with any business relationship.

Accepting gifts: What's our policy?

From time to time, you may be offered gifts from a person or a company that does – or seeks to do business – with us. Use the following information to guide your decision-making and ask for help if you are ever unsure of the proper course of action. Note that this policy applies whether you are personally offered a gift or if a gift is

offered for the benefit of a specific group or department at the Company (including as a prize to be distributed at a party or event).

• ***Gifts worth not more than US\$75:***

In general, you may accept a gift as long as the total value of all gifts received from such person or company does not exceed US\$75 in value in any one calendar year. Keep in mind gifts of cash or cash equivalents such as checks or gift cards that can be converted to cash are never acceptable.

• ***Gifts greater than US\$75 but less than US \$500:*** Gifts within this range are subject to our ["ordinary course of business" test](#). Ask yourself:

- Would the gift be considered customary given your job duties, job title and seniority? If the gift was reported in the media, would others think favorably of you? Of our Company?
- Would the gift complement or enhance a business relationship? For offers of hospitality or entertainment, is the person extending the offer going with you?

If the answers to these questions are "yes," based on your good faith assessment, you may accept the gift without notifying the [Management Audit department](#).

In addition to the other requirements of this policy, if you are located in the United Kingdom, work for a Disney entity that is subject to United Kingdom law, or are otherwise subject to U.K. law you must obtain approval from your immediate manager before accepting any gift whose fair market value exceeds US\$75.



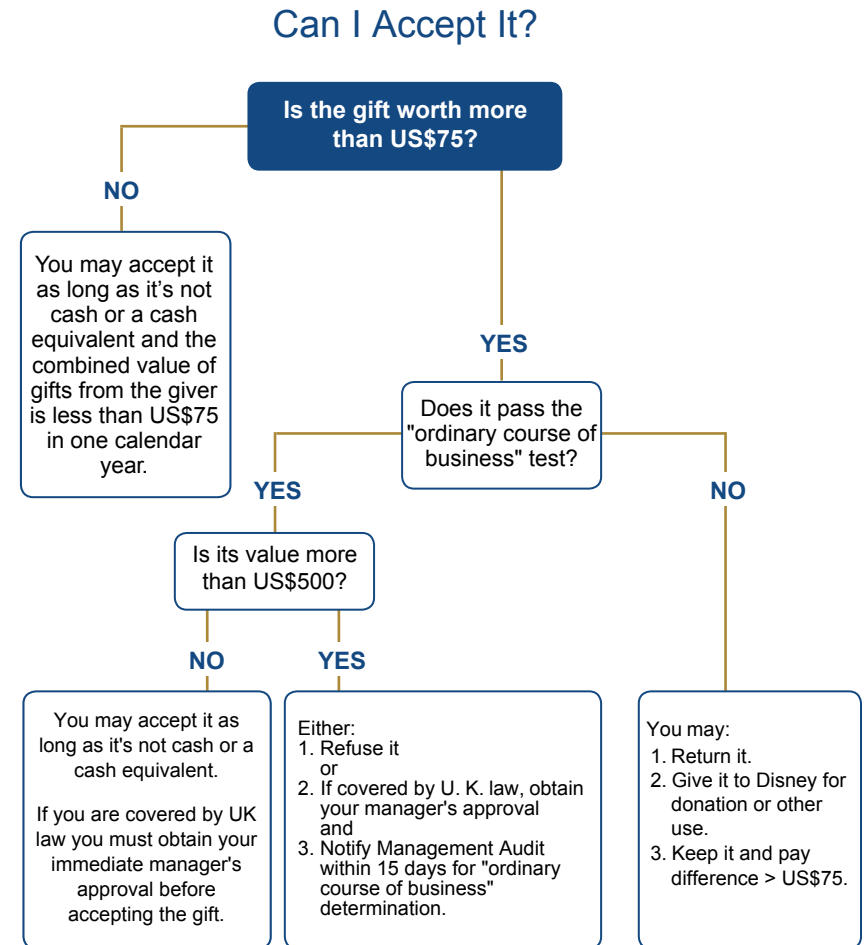
“One of my vendors routinely provides me with tickets to a professional football game – is that a violation of our gift policy?”

Use the “ordinary course of business” test. Let’s assume the gift is customary given your position at the Company. Ask yourself: Does the gift complement or enhance my business relationship? Certainly, if the vendor just passes the tickets on to you and does not attend with you, the event clearly does not offer an opportunity to build upon your working relationship. In that case, you should either: return the gift to the vendor with a polite letter that references our policy or accept the gift but write a check to the Company for the amount by which the fair market value of the tickets exceeds US\$75 (generally, the fair market value will be determined by Management Audit and the proceeds of the check will be used by the Company for charitable purposes).

If the gift fails the “ordinary course of business” test, you must either: (1) return the gift letting the giver know that it is against Company policy to accept it; (2) give the gift to the Company so it may be either donated to charity or otherwise disposed of; or (3) keep it and write a check to the Company for the amount by which the fair market value of the gift exceeds US\$75, which will be used by the Company for charitable purposes.

- **Gifts greater than US\$500:** If you are offered a gift that you, in good faith, believe meets the “ordinary course of business” standard but exceeds US\$500 in value, you have the option to refuse or accept the gift. If you decide to accept it, you must notify the [Management Audit department](#) within 15 days of receipt. They will review the gift and determine whether it was, in fact, within the “ordinary course of business.” If Management Audit determines it was not, you will be required to pay – or make a charitable donation through the Company equal to – the amount by which the fair market value of the gift exceeds US\$75.
- **Meals:** Meals are not subject to a dollar-value limit as long as they meet the “[ordinary course of business](#)” test. Good working relationships are important to our business, but use good judgment and be careful to avoid even the perception of something improper.

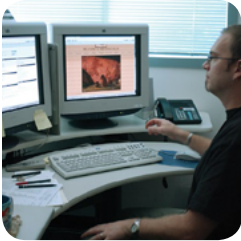
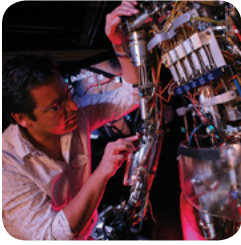
Gift Decision Tree



Note that :

- 1) Gifts of cash or cash equivalents may never be accepted, and
- 2) Meals in the “ordinary course of business” are not subject to a dollar value limit.

This is a general framework for decision-making. Keep in mind, we never accept any gift if it would compromise our professional judgment or suggest favorable or preferential treatment. Contact the Management Audit department regarding any questions or concerns regarding Disney’s gift policy.



Gifts and Anti-corruption Compliance

In addition to the requirements for accepting or receiving gifts stated in this document you must also be mindful of the Company's [Anti-corruption Policy](#) which is available at disneycompliance.com. Please note that any gift – including meals, entertainment, and hospitality – given to a “government official” (which term is defined in the Anti-corruption Policy) that is worth more than \$20 USD, or a meal that cost more than \$100 USD per person, must be approved in advance by the Legal department or the Company's Chief Compliance Officer.

Vendors, Suppliers and Customers

Be fair and ethical in purchasing decisions. If you purchase products or services for the Company, put the Company's interests first and seek to obtain the maximum value for the money spent consistent with Company policy. You must also comply with the Company's [competitive bidding policy](#).

Treat all vendors fairly, honestly and courteously. Avoid unfair buying tactics and favoritism, and never take unfair advantage of any vendor through manipulation, concealment, misrepresentation of material facts or any other unfair practice.

We are committed to having our suppliers reflect the same diversity that we seek in our workforce. Work to identify minority and women-owned business enterprises, and evaluate them in accordance with their qualifications.

Know your obligations as they relate to customers and licensees. Treat others as you wish to be treated. Understand the policies and standards that are applicable to our Company. Don't misrepresent the characteristics or capabilities of our products or recommend products or services that don't meet a customer's needs.

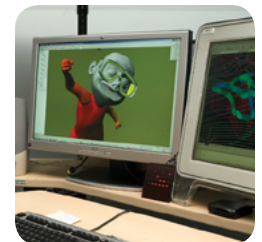
Be careful when collecting information about competitors, customers and vendors. You have a responsibility to comply with Company policy in gathering competitive information in the marketplace. Although the standard for what is acceptable and what isn't may vary from country to country, the Company prohibits certain practices that are always improper as follows:

- Theft
- Blackmail
- Wiretapping
- Bribery
- Trespassing
- Industrial espionage
- Receipt of stolen property
- Asking or inducing someone to disclose information that is confidential regarding a current or former employer. (Note that collecting information for newsgathering purposes is governed by other policies set forth elsewhere.)

In addition, collecting information by misrepresenting facts, employee identity or Company affiliation is also prohibited without the prior approval of the Company's General Counsel.

“I found a vendor's confidential five-year plan in one of our conference rooms. What should I do?”

Do not read the information or share it with others. Deliver the plan promptly to the Legal department for follow-up.





“I have a friend who is starting a new business and has asked me for a list of customers who might be interested in her services. Is that okay?”

No, our customer lists are private and should never be shared with anyone outside our Company (or with anyone inside our Company who does not need the information to do his or her job).



If you find you're in possession of information that may have been obtained unethically or illegally, or if you're ever in doubt about whether a particular practice for the collection of information is proper, contact the [Legal department](#) or [The Guideline](#).

Protecting Company Assets

Our assets – whether information, physical, financial or technology assets – are essential to operating our Company successfully. As a Cast Member or employee, you have a responsibility to use them only for legitimate Company business and safeguard them against theft, loss, waste or abuse. Never use opportunities you discover through the use of [Company assets](#) for your personal gain.

[Confidential information](#) is protected non-public information you may be exposed to as part of your job and can relate to our Company, guests, customers, vendors or other Cast Members and employees. It represents one of our Company's most valuable assets and should never be used for your personal benefit or disclosed to others inside or outside of the Company who don't have the right to it – and the need for it – to carry out their assigned work. Note, however, that the obligation not to disclose confidential information does not apply to a disclosure made 1) in confidence to an attorney or directly or indirectly to a federal, state, or local official, as long as the disclosure is made for the purpose of reporting or investigating a suspected violation of law or 2) in a

complaint or other document filed in a lawsuit or other proceeding as long as the filing is made under seal.

Examples of confidential information include:

- [“Inside” information](#) about our Company that could reasonably influence someone in making decisions to buy or sell stock in a company (ours or someone else's). For more information, see the [Inside Information and Securities Trading section](#)
- Cast Member and employee personnel information
- Non-public sales and earnings figures
- Financial projections or strategic plans
- Information about contemplated acquisitions, mergers, stock splits or sales of associated companies or real estate transactions
- Strategic business or marketing plans
- New creative projects contemplated by the Company

Except as otherwise stated in this section, never disclose any [confidential information](#) to any party except as specifically authorized by management and be careful not to discuss confidential information in public areas. Be sensitive to conversations you have via cell phone or on elevators and take care in dialing fax numbers or sending e-mails if transmitting confidential information electronically.

Our technical and creative works are renowned the world over. You have a responsibility to protect our trade secrets and proprietary information even after you leave the Company.

“A co-worker asked me to make her a copy of some spreadsheet software we use in our department. That's okay since we work for the same company, right?”

No, copying the software could violate our license agreement as well as copyright laws. Unless you have appropriate permission to do so, never copy any software – even for business use.



“I think my supervisor lists expenses on his expense report that he didn’t incur. Should I say something to someone?”

Yes. Lying on an expense report is not only a violation of our Standards, but is plainly wrong. Report your concern to your Human Resources representative, the Management Audit department or contact The Guideline.

Safeguard our physical and electronic assets, too. Our [Company assets](#) also include the physical space where you work, the equipment and supplies you use and the computer resources you access. Hardware, software, e-mail, voicemail, intranet and Internet access, computer files and programs – including any information you create, send, receive, download or store on Company assets – are Company property, and we reserve the right to monitor their use, where permitted by law to do so.

Never install unauthorized software, hardware or storage devices on your Company-issued computer and don’t access our network through unauthorized applications or devices. Use good judgment if authorized to use Company-provided Internet access; take care to never violate a law, harass other users, disclose confidential information or interfere with network users, services or equipment.

Accurate Recordkeeping and Financial Reporting and Complaints Regarding Accounting and Auditing Matters

Accurate and complete recordkeeping is essential to the successful operation of our Company, as well as to our ability to meet our legal and regulatory obligations. You have a responsibility to be accurate, complete and honest in what you report and record to meet regulatory requirements, as well as in all Company documents, including accounting records, time cards, expense reports, invoices, payroll records,

safety records, business records, performance evaluations, etc.

If you see or suspect financial misconduct, notify your supervisor immediately and contact the [Management Audit department](#) or [The Guideline](#). For more information, refer to the [Employee Complaint Procedures for Accounting and Auditing Matters](#).

You are also responsible to provide accurate information in connection with our financial reporting obligations.

Comply with Company policy when it comes to retaining, storing and disposing of Company records. Our [records management and retention policy](#) ensures that we maintain the records we need to meet our legal, tax and regulatory requirements and securely dispose of records that are no longer needed. Take care never to dispose of information that may be relevant to current or threatened litigation or subject to a [legal hold](#) until you are authorized in writing to do so by the [Legal department](#).

Speaking on Behalf of our Company

Our Company conducts business in many parts of the world and the public expects the information we provide to be accurate. It’s critical that information provided to the public is complete, consistent and accurate and also that [confidential information](#) is protected. Unless you are an authorized Company spokesperson, don’t speak on

“A local reporter approached me at work and asked me to comment on a rumor circulating about our Company. It was a great opportunity to set the record straight, but I didn’t think I should say anything.”

Your instincts were right. Unless you are an authorized representative, you should not speak on behalf of the Company. Direct the reporter to the [Corporate Communications department](#).



behalf of the Company. Instead, refer the individual to one of the following:

- For media inquiries, contact the [Corporate Communications department](#).
- For questions regarding financial performance, contact Investor Relations.
- For legal issues, contact the [Legal department](#).

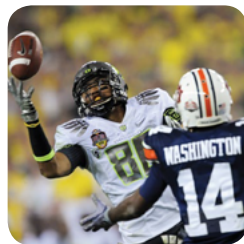
Be responsible in your use of social media. Use online tools in a way that is consistent with our Company policies. Certainly when speaking about the Company you should be professional, truthful and accurate. Regardless of whether you access the Internet via our systems or yours, be sure to respect your obligation to protect [confidential information](#) and the confidential information of companies with which we do business. If you comment online regarding any aspect of Company business, identify yourself as an employee and make it clear that the views posted are your own and not those of our Company.



Want to know more?

*[Employee Policy Manual](#),
see [“Use of Social Media”](#)*





5

Play by the Rules: Our Commitment to Lawful Business Practices

We are committed to comply with the law everywhere in the world that we operate.

Competition Laws

We expect Cast Members and employees to compete aggressively, but fairly, and to sell our products and services on the basis of quality and merit. Antitrust and competition laws are designed to promote a free and open marketplace. You have a responsibility to comply with these laws wherever you do business and avoid conduct that might suggest a violation. Failing to do so can subject both you and the Company to imprisonment, substantial criminal fines and civil financial liability.

Antitrust laws (sometimes called “competition laws” or “unfair trade laws”) prohibit agreements that unreasonably restrict competition. Don’t enter into any agreement or understanding, whether formal or informal, with a competitor, customer or supplier to:

- Set prices or price-related terms, also known as “fixing” prices
- Refuse to deal with a customer or supplier

- Divide territories or customers

Also, in certain circumstances, using market power to coerce buyers to buy unwanted products by tying them to other “must have” products, may be prohibited.

Keep in mind, antitrust laws are complex and differ from country to country. Entering into exclusive dealing or licensing agreements, engaging in pricing practices that suggest a monopoly, charging different prices to different customers for the same product – those and many similar practices may raise issues under antitrust laws. If you ever have a question about how antitrust and competition laws apply to a particular business situation, you should seek help from the [Legal department](#) or contact [The Guideline](#).

Trade Secrets, Trademarks, Patents and Copyrights

You must honor the trade secrets, trademarks, patents and copyrights of others. This includes trade secrets of previous employers. While our Company is entitled to your skills and creative energy while you work here, we do not want to learn of secrets you developed or learned about through previous employers.

Copyright infringement issues can be complex. A person who infringes a copyright willfully and for commercial advantage may be subject to civil liability as well as criminal prosecution. There are some circumstances,



License to use traden
B the sole and exclus
d by A, upon any
the mixture

however, where it is proper to reproduce portions of copyrighted work for purposes of criticism, comment, news reporting, teaching and research; this is called “fair use” and doesn’t violate copyright law. However, making fair use determinations is difficult and must be done on a case-by-case basis. Don’t take chances: any questions about what is permissible – and what isn’t – should be directed to the [Legal department](#) to ensure compliance with the law.

Product Safety

The safety of products bearing Disney brands, characters and other intellectual property is of crucial concern to the Company. We require that licensees and manufacturers comply with all applicable legal and regulatory safety requirements and conduct safety tests by independent, certified third-party testing laboratories or equivalent procedures.

If you become aware of a product safety concern regarding any Disney-branded product immediately contact the Disney Product Integrity group at 818-560-3474.

Food and Drug Safety

We are recognized around the world, among other things, as a provider of high-quality food products and merchandise. We rely on you to preserve the reputation we’ve earned. Comply with all applicable food and drug laws and cooperate fully

with all federal and state inspectors who come to our facilities. Make sure you:

- Store, prepare and serve food, drugs and other products in a sanitary and healthful condition.
- Never represent that a product has been inspected or labeled as fit for use if it hasn’t been.
- Don’t sell anything that is improperly or incompletely labeled.
- If a product needs inspection, don’t allow it to be purchased or sold in any of our facilities without inspection.



Anti-corruption, Anti-bribery

We never, under any circumstances, offer bribes or influence decisions through improper means. As a global company, we have a duty to comply with the laws in the countries in which we do business as well as the [U.S. Foreign Corrupt Practices Act \(FCPA\)](#) and (if it applies to you) the [U.K. Bribery Act](#). As a Cast Member or employee, you need to understand and comply with the FCPA and the U.K. Bribery Act as well as any other anti-corruption laws that apply where you operate. Violations can result in lawsuits, substantial fines – even imprisonment for individuals.

The rules for giving gifts to government officials are very strict. Never offer, promise or give (either directly or indirectly) [anything of value](#) to induce or influence a





**“Anything of value”
could be:**

- Free or discounted goods or services
- The promise of a job
- A charitable or political contribution
- Gift certificates or gift cards
- Use of materials, facilities or equipment
- A loan
- Tickets to a theme park or resort accommodations

government official (including officials of international organizations, political parties and employees of state-owned or state-controlled enterprises) to gain an improper advantage or to do something improper. Violations can subject you and our Company to severe penalties and damage our public reputation.

Regardless of local practice or the practices of other companies, make sure you avoid even the appearance of doing something improper.

For more information, see our anti-corruption policy.

Giving any gift requires accurate recordkeeping. Any gift permitted under our policy and given by you in connection with your job must be transparent and recorded accurately in our corporate books and records. When completing an expense report regarding the gift, you are required to accurately state the purpose of the expense and the person to whom you gave it. You must also identify whether it was given to a government official – in which case you should have obtained the approval of the [Legal department](#) in advance.

Before engaging in any transaction which you think is questionable, you must consult with the [Legal department](#). If the transaction is approved, make sure it is

accurately reported in our Company’s books and records.

We could be responsible for bribes made on our behalf by third parties. Our

Company may be liable if a bribe is paid on our behalf, even if we did not authorize it to be paid, so it is critical that we are careful in the selection of agents, i.e., those people or companies who act on our behalf. Exercise [due diligence](#) to make sure our agents are reputable and that they agree to conduct business in compliance with anti-bribery laws and regulations.

A full statement of the Company’s [Anti-corruption Policy](#) can be found at disneycompliance.com. That Policy is called “The Walt Disney Company and Affiliates Global Anti-corruption Policy.” It sets forth in detail the policies and procedures to be followed regarding anti-corruption and anti-bribery compliance. If you have any questions about the Policy please contact the Legal department or the Guideline.

Export, Import and Anti-boycott Laws

We comply with all applicable laws, regulations and restrictions in the import or export of products, services, information or technology, wherever we operate in the world. If you are involved in the movement of goods or technology across international borders, make sure you know and comply with:





- Any U.S. restrictions on doing business with certain foreign countries
- All applicable export control requirements
- The trade laws and regulations associated with the countries in which you do business

We also have a responsibility to comply with U.S. anti-boycott laws. If you receive a request to comply with a foreign boycott (or a request to supply boycott-related information), consult with the [Legal department](#) to determine the appropriate course of action.

Doing Business with and Providing Information to the Government

Doing business with the government is highly regulated and typically follows stricter rules than those in the commercial marketplace. If you work with government officials or a government-owned (or partially-owned) company, you have a special duty to know and comply with applicable laws and regulations, adhere to the highest standards of integrity and avoid even the appearance of impropriety.

We are committed to full compliance with the law, wherever we operate. If you are responsible for acting on our Company's behalf in providing financial information, complying with the tax laws or meeting cash-related reporting requirements or any other legal or regulatory requirements, always be accurate and timely. Moreover, never destroy, discard, tamper with,

conceal or make any false entries on documents you provide to government agencies or officials.

The same is true for responding to any request in connection with a government investigation or proceeding. If you ever receive such a request you should immediately advise the [Legal department](#) and follow its instructions to ensure that the information or documents we provide fully comply with our legal obligations.

Inside Information and Securities Trading

As a Cast Member or employee, your job may expose you to material, nonpublic (or "inside") information about our Company or companies with which we do business. Material [inside information](#) is information about a company that is not available to the public but, if it were, might influence someone's investment decision about that company. Examples of material inside information include: information about mergers or acquisitions, financial performance, changes in executive management, significant transactions or new projects contemplated.

You may not trade in Company stock or other securities based on material inside information you have about our Company, and you may not trade in the stock of companies we work with if your job exposes you to inside information about those companies. Passing along a "tip" is

"I just heard about a large contract Disney entered into with one of our suppliers. A friend of mine owns stock in the supplier's company and mentioned recently that he planned to sell it. I know I can't tell him about the news of the award, but is it okay to encourage him to hold on to his stock?"

No, you cannot help someone make a profit or avoid a loss on the basis of material non-public inside information you know about by virtue of your job. Suggesting to your friend that he hold onto his stock, even if you don't offer a reason, would be a violation of our policy and may also be a violation of U.S. insider trading laws.



also a form of insider trading and strictly prohibited. Keep in mind, even the appearance of an improper transaction must be avoided.

What if you participate in the employee Stock Purchase Plan? You are encouraged to participate in this program and invest in our collective future. Do not, however, change your instructions in the plan if you are in possession of inside information.

Money Laundering

Money laundering is the process by which funds generated through criminal activity (such as terrorism, drug dealing, fraud, etc.) are processed through commercial transactions in order to conceal the source of the proceeds, avoid reporting requirements or evade taxes. As a Company, we do not want to be used by those engaged in criminal activity. Be on the alert for possible instances of money laundering and immediately notify your supervisor, the [Legal department](#) or [The Guideline](#) regarding any suspicious activity.





6

Respect: Our Commitment to the Community

As a member of the global community, we have a responsibility to be a good corporate citizen.

An International Presence

We are dedicated to delivering quality products and services and cooperating with community leaders and members throughout the world to benefit local communities. While we are bound by U.S. laws and regulations and Company policy, we recognize that, as we grow, we are introducing not only a new Company, but often a new corporate culture and, perhaps, different business practices in countries all across the globe. We count on every Cast Member and employee to follow the letter and the spirit of those U.S. laws that may apply (for example, the [Foreign Corrupt Practices Act](#)) and maintain an awareness of – and sensitivity to and commitment to observe – differing legal requirements from country to country.

If a local law conflicts with our Standards, comply with the local law. If a local custom conflicts with our Standards, comply with the Standards. If you're not sure, [ask for help](#).

Labor Standards

We comply with employment laws in all markets where we operate. In addition, the Company's International Labor Standards prohibits the following in connection with the manufacturing of Disney-branded products: 1) child labor; 2) involuntary labor; 3) coercion or harassment; 4) unfair discrimination; 5) serious health or workplace violations; 6) interference with workers' freedom of association; and 7) the improper use of home workers. These requirements apply to the Company's own sourcing activities as well as to licensees, vendors, buying agents and production facilities involved in the manufacture of Disney-branded products.

The Environment

We are committed to the protection of the environment and the conservation of natural resources. We fully comply with environmental laws and regulations, including those relating to disposal of wastes. In addition to complying with all such applicable laws ourselves, we also expect companies and contractors with which we partner to do the same.

"... maintain an awareness of – and a sensitivity to and a commitment to observe – differing legal requirements from country to country."

"I have seen some co-workers dumping trash in an area that's not authorized for that purpose, but I don't want to get involved – or get them in trouble."

As a Cast Member or employee you have a responsibility to take action when you become aware of potential violations of our Standards; this includes reporting environmental hazards or any other unsafe working conditions. Speak to your supervisor or contact The Guideline.

Charitable and Political Activities

We want to foster good relations within the communities where we operate. You are encouraged to participate in local activities that address the needs of the communities in which you live and work and to participate as a private citizen in government and the political process, using your own money and your own time.

Make sure your involvement in charitable or political activities is not prohibited by other Company policies or suggestive of anything improper, and do not use without specific authorization (such as is authorized by the Company's Matching Gifts program) any Company funds or resources to help or promote any charitable cause or political candidate or party.

Note that the Company's Senior Vice President of Government Relations must approve any corporate contribution to any political candidate, any committee supporting any such candidate, any political party, any organization advocating on behalf of or in opposition to any such candidate or party organization, or any organization advocating on behalf of or in opposition to any proposition that is or is expected to be submitted to voters of a jurisdiction.



Glossary

“Anything of value” – Money or other “things” (e.g., services, transportation, hospitality, donations, contributions, etc.) that have value.

Company assets – Anything owned by the Company, including physical property (such as buildings, equipment and furniture), technology (such as computer hardware, software and information systems), financial assets (such as cash, bank accounts and credit standing) and information assets (such as customer lists, financial information and intellectual property).

Confidential information – Information a company has or acquires that is kept private and not made available to the public. It includes personal information about its employees, any information that isn’t readily available from a public source or specific information that is shared between parties in confidence.

Conflict of interest – A conflict of interest exists when an employee or a member of his/her family is involved in an activity that affects (or appears to affect) his/her objectivity as an employee of the company. Personal relationships, outside employment opportunities and investments an employee makes can all pose potential conflicts of interest.

Due diligence – Taking the necessary actions required to know who a person or a company is doing business with; knowing why, when and to whom they are releasing funds, and being in a position to feel confident that business relationships are transparent and ethical.

Financial interest – Any paid relationship or arrangement (for example, as agent, representative, employee, promoter, consultant or “finder”) with a business or any ownership interest (of stock, partnership interest, etc.).

Foreign Corrupt Practices Act (FCPA) – A law that prohibits the bribery of non-United States government officials (including employees), and which requires certain accounting and recordkeeping practices for companies.

“Good faith” – Honestly believing in what you’re doing. For example, making a report to The Guideline “in good faith” means that you honestly believe that there’s a violation of our Standards or Company policies and that you’re not deliberately making a false report.

Immediate family – A spouse, parent, child, sibling and mother- or father-in-law, son- or daughter-in-law, brother- or sister-in-law, as well as people (other than household employees) who permanently reside in a person’s home.

“Inside” information – Any information about a company, its customers, suppliers or other companies that an employee knows – by virtue of being an employee of the company – that is not known by the public. Such information is material if it would likely be considered important in deciding to buy, sell or hold stock in a company. “Material inside information” can include information about new products and services, pricing, budgets, earnings announcements, proposed mergers and acquisitions, anticipated layoffs, etc.

Insider trading – Using material, non-public (i.e., “inside”) information – or tipping someone else to use it – to buy or sell stock in a company.

Intellectual property – Intangible property that has commercial value and is the result of creative effort including copyrighted property (such as literary or artistic works), patents, trademarks, business methods or industrial processes.

Legal hold – When a company is – or may be – involved in a legal proceeding, the law requires that it save information relevant to the case; a legal hold is a notice that advises you not to destroy certain records. It generally includes special recordkeeping instructions and requests for specific documents and audits.

Material financial interest – Any paid relationship or arrangement (for example, as agent, representative, employee, promoter, consultant or “finder”) with a business organization or any ownership interest (of stock, partnership interests, etc.) in excess of 5 percent in a publicly traded entity or, in the case of a non-public entity, having a fair market value in excess of US\$25,000.

“Ordinary course of business” test – A series of questions you can ask yourself to inform decision-making about accepting a gift: (1) Would the gift be considered customary given your job duties, job title and seniority? (2) If the gift was reported in the media, would others think favorably of you? Of our Company? (3) Will the gift complement or enhance a business relationship? (4) For offers of hospitality or entertainment, is the person extending the offer going with you?

Proprietary information – Information that a company owns that represents the work it does. It includes software programs, trade secrets, engineering drawings, copyrights, ideas, techniques, inventions, product specifications, research, marketing data – all of the information that makes our Company unique. All proprietary information is considered confidential information.

U.K. Bribery Act – A law that makes it illegal for anyone (public, quasi-public or private) working for a company in the U.K., or a company that does business or is registered in the U.K., to give or receive a financial or other advantage to induce or reward someone for doing – or to do – an improper act in exchange for a business advantage.