



NON FRATENIZATION AND NEPOTISIM POLICY

To avoid the dangers of fraternization between and among managers, as well as between and among managers and subordinate Team Members, and to help prevent even the appearance of improper conduct, favoritism, improper use of authority or sexual harassment, it is the policy of the Company that managers, supervisors or any other Team Member who has the authority to directly or indirectly affect the terms and conditions of another's employment shall not fraternize among each other, or with a subordinate Team Member either at or outside of the workplace. The fraternization prohibited in this policy includes dating, romantic involvement or sexual relations, but does not include, and is not meant to discourage, friendship or social activities among Team Members. Should a personal relationship prohibited by this policy be contemplated, the supervisor, manager or Team Member involved is required to notify their manager immediately, as well as notify the human resources department. Where a relationship prohibited by this policy exists, the Company shall take whatever action it believes necessary to remove the parties from any continued contact and/or supervisory line of authority. If possible, the Company will consider the affected parties' opinions on how best to resolve the situation prior to making a decision.

The Company recognizes that the question of whether a relationship constitutes fraternization or simply a social relationship is a personal issue. However, because of the potential for inappropriate conduct, Team Members are encouraged to bring any questions regarding fraternization to the human resources department.

IPIC Entertainment welcomes the opportunity to hire and retain qualified Team Members who are related to one another by blood or marriage. Cases concerning the employment of relatives will be dealt with on a case-by-case basis to ensure maximum flexibility in handling such situations. While IPIC Entertainment supports families working together, such relationships can create problems in the workplace, including suspicions of favoritism if the related Team Members are in a supervisor-subordinate relationship, because of this it is the policy of IPIC Entertainment that:

1. Any Team Member of IPIC Entertainment who has or acquires a familial relationship (as defined below) with another Team Member shall not have any direct or indirect

administrative or operational authority over the other person. This prohibition means not only that a person cannot supervise a family member but also that the family member cannot be in that person's chain of command; for example, a family member cannot work in a department in which a family member is the Vice President.

2. A Team Member cannot use his/her authority or position with IPIC Entertainment to benefit or disadvantage another Team Member in a familial relationship.
3. Team Members are required to notify the company's Human Resources Department of any existing familial relationships, any familial relationships that are created among Team Members and the potential employment by IPIC Entertainment of a family member.

Definition of "Familial Relationship": within this policy means two Team Members (or a Team Member and job applicant) in a relationship of husband, wife, father, mother, brother, sister, son, daughter, uncle, aunt, nephew, niece, grandfather, grandmother, grandson, granddaughter and in-laws.