



ANTI-BRIBERY AND CORRUPTION POLICY

1.0 PURPOSE

Starz¹ insists on compliance with applicable laws as well as honesty, integrity and fairness in all aspects of our business. We win business because of the high quality of our products and services, not because of bribery and corruption. To be successful, we also rely on the trust we build with our stakeholders such as our team members, regulators, shareholders, distributors, licensees, suppliers and other third parties. Bribery and corruption violate that trust.

All countries to which we supply our products and services have anti-corruption and anti-bribery laws, such as the United States Foreign Corrupt Practices Act ("**FCPA**"), the Canadian Corruption of Foreign Public Officials Act, as well as similar federal/national, regional, state/provincial and local laws throughout the world.

We have designed this policy to prevent bribery and corruption, avoid the appearance of any wrongdoing and provide the accounting controls and procedures that will enable Starz to promptly and effectively respond to any inquiries from regulators about our conduct and transactions. Violations of anti-bribery and corruption laws may subject not only Starz but also relevant team members, to severe civil and criminal penalties, including jail time.



This policy prohibits bribery and corruption in all circumstances, whether in the government or private sector contexts.

2.0 SCOPE

This policy applies globally to all Starz employees (whether part-time or full-time), as well as to corporate officers and members of our board of directors, regardless of where they are located. Throughout this policy when we use the term, "team members," we are referring to all of these categories as well as to contractors assigned to work for us (whether independent or contracted through a professional employment organization).

It is essential that team members understand that they cannot use third parties or their own personal funds and resources to circumvent this policy. Willful ignorance is not a defense.

¹In this policy, the terms "Starz" and such terms as "the Company," "we," "us," and "our" may refer to Starz Entertainment Corp. or one or more of its consolidated subsidiaries or to all of the entities taken as a whole. All of these terms are used for convenience only and are not intended as a precise description of any of the separate companies each of which manages its own affairs.

3.0 OUR COMMITMENT

We do not tolerate bribery or corruption of any kind, whether of a government official or a private individual. Team members must never offer, provide or authorize bribes of any kind (including facilitation payments) either directly or indirectly, through a third party, such as an agent, broker, distributor, fixer or licensee, to a government official or a private individual.

In addition, we must never request or accept bribes of any kind, either directly or indirectly. A bribe may be monetary or non-monetary, tangible or intangible and may take the form of, or be facilitated through:

- payments of money;
- event tickets, travel, gifts or entertainment;
- discounts, loans and/or financing given on non-commercial terms;
- rebates or kickbacks in relation to services provided;
- overpayments to suppliers;
- use of assets at a discount or free of charge;
- promotional sponsorships, grants and charitable contributions;
- political contributions and lobbying services;
- employment or internships; or
- information or assistance.

To manage our bribery and corruption risks we implement a range of procedures, also known as controls, relating to dealings with government officials, gifts, meals, travel and entertainment, purchase order and contract counterparties, promotional sponsorships, grants and charitable contributions, lobbying and political contributions as well as record-keeping.

If a team member is asked to pay a bribe, they must refuse to pay and immediately inform the Office of the General Counsel at ethics@starz.com.

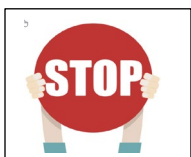
Team members must remain alert to corruption and bribery red flags and promptly report them to the Office of the General Counsel at ethics@starz.com or through the channels listed on the last page of this policy.

4.0 GOVERNMENT OFFICIALS

Identifying government officials

Dealing with government officials, also known as public officials, carries a higher risk of corruption, or the perception of it, and a higher risk of regulatory enforcement against Starz and the relevant team members. Team members must be especially careful when communicating with government officials, providing gifts, meals, travel, entertainment and any other form of hospitality and/or any in-kind assistance to government officials.

The laws that apply to us define “government official” very broadly. As a result, it may not always be simple for a team member to identify a government official, especially those outside of the United States.



For example, did you know?

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“Government official” has a very broad meaning under applicable laws which includes:

- officers, employees and representatives of any national, regional or local government institution;
- individuals holding a legislative, administrative, judicial, diplomatic or military position of any kind;
- officers, employees and representatives of a public international organization such as the United Nations and World Bank;
- officers, directors, employees and representatives of any government-owned entity, such as an airline, radio and television broadcaster and film production house;
- officers and representatives of a political party;
- candidates for a political office; and
- members of a royal family.

This list is not exhaustive. You should contact Ethics & Compliance at ethics@starz.com if you are unsure whether an individual is a government official.

Following Risk-Based Procedures for Third-Party Onboarding

When conducting Starz business, you are responsible for following our risk-based program for onboarding third parties. By engaging in this process, you will be able to identify when you are dealing with a government official. You may also be required to implement special risk-calibrated guardrails to reduce potential risk for Starz, you, and any other team members involved in the transaction.

Facilitation payments

Our prohibition on bribery applies to all improper payments regardless of size or purpose, including facilitation payments. Starz prohibits team members from offering, paying or authorizing facilitation payments. The terms “facilitation,” “expediting” and “grease” payments refer to small payments to government officials to expedite or facilitate non-discretionary actions or services such as obtaining an ordinary license or business permit, or processing visas, permits, customs clearances or providing power or water services or police protection.

If a team member is asked to make a facilitation payment, they must refuse to pay and immediately inform the Office of the General Counsel at ethics@starz.com or through one of the channels listed on the last page of this policy.

Payments made under duress or arising from extortion

We prioritize the physical safety and well-being of our team members. If your safety is at risk, you should take reasonable steps to remove yourself from danger. In an exceptional situation reasonable steps could include making a payment to a government official to ensure your safety. If in a situation of this type, as

soon as you are safely able to do so, you must report the situation and the payment to the General Counsel. It is essential to remember that applicable law requires that the facilitation payment be accurately and completely reported in Starz's books and records.

5.0 GIFTS, MEALS, TRAVEL, ENTERTAINMENT & BUSINESS HOSPITALITY

From time to time, to create goodwill and sound working relationships you may wish to exchange gifts, or pay for meals, travel, entertainment and other forms of business hospitality, also known as business courtesies, for third parties.

Although these activities may be intended for lawful ethical business promotional reasons and may be common in the country where you work, they are scrutinized by regulators around the world to ensure that the business courtesies are not used to funnel bribes, corruption or kickbacks.

The proper management of the provision and acceptance of gifts, meals, travel, entertainment and other forms of business hospitality is key to reducing the risk of actual or perceived bribery and corruption and an enforcement action by our regulators. That is why we require team members to follow the procedural requirements for pre-approval in our Gifts and Entertainment Policy [\[url\]](#).

Team members may only provide or accept business hospitality that is:

- in good faith, occasional, reasonable and appropriate in the relevant locations and for the parties involved;
- transparent; and
- which comply with our Gifts and Entertainment Policy.

Special rules for government officials

Remember that offering and giving gifts and hospitality to federal/national, regional, state/provincial and local government officials, is highly regulated in the U.S. and throughout the world. Some countries prohibit gifts and hospitality for government officials – and other countries impose special public disclosure requirements. For these reasons, to protect Starz and you, gifts, meals, travel, entertainment and other business hospitality for government officials are subject to prior written approval of the Office of the General Counsel.



Therefore, it is essential that you ensure that all gifts and hospitality for government officials, such as event tickets, golf and sports invitations, accommodations, transportation, lodging and travel incidentals, regardless of value, receive written pre-approval as described the Gifts and Entertainment Policy. Please send an email to ethics@starz.com to request pre-approval.

6.0 PROMOTIONAL SPONSORSHIPS, GRANTS & CHARITABLE DONATIONS

Promotional sponsorships, grants and charitable donations can be important ways for Starz to support worthy causes and to give back to our communities. Like gifts and hospitality, if not carefully managed and documented, sponsorships, grants and charitable donations can be seen as unlawful payments. Those suggested by government officials or our counterparties pose elevated risk. We never make a sponsorship, grant or charitable donation to disguise a bribe or to gain an improper business advantage.

You must ensure that before Starz enters into sponsorships, grants or charitable contributions that you conduct risk-based due diligence and understand that our funds and resources will be used lawfully and appropriately.

A **sponsorship** is a payment or anything of value provided to a third party to support an event, activity, or organization for which Starz will receive a promotional benefit. Common examples include film festivals or sports events.

- A **grant** or charitable **donation** is money or anything of value given to non-profit or charitable organizations to promote social responsibility and to improve quality of life. A donation may be in the form of a payment, products, equipment or services, either given or loaned.
- A request for a grant or donation from a government official is particularly risky and must be immediately brought to the attention of Ethics & Compliance at ethics@starz.com.



Before you offer or commit to provide any promotional sponsorships, grants or charitable donations to a third party, you must obtain written pre-approval. Please send an email to ethics@starz.com to request pre-approval and include the following documents (keep copies for your records):

- Documents showing the names, location, co-sponsors and attendees, as relevant for the transaction;
- Documents showing the rationale for the sponsorship, grant or donation – such as the business purpose (promotional benefits, community outreach etc.);
- A copy of a written request on the letterhead of the recipient organization or a brochure which specifies: (i) the name of the organization; (ii) the amount of the payment or contribution or the replacement/market value of the request and (iii) whether Starz will receive a promotional benefit and/or the purpose of the promotional sponsorship, grant or donation;
- If the recipient of the sponsorship, grant or charitable donation is a U.S.-based charity, we need proof of the recipient's 501(c)(3) charitable organization status, such as an I.R.S. Affirmation Determination letter. If the recipient is outside the U.S., we need an equivalent document demonstrating that the recipient is a legally registered charitable organization.

7.0 POLITICAL CONTRIBUTIONS AND LOBBYING ACTIVITIES

Transparency and accountability are embedded into Starz's public policy, political spending and lobbying

actions. We actively support corporate citizenship and encourage our team members to be active in civic and community activities, including participation in the political and democratic process. All political, lobbying and civic activity by Starz and its team members must comply with applicable law and this policy.

Starz's political contributions

We do not seek to influence the political process using improper or corrupt means. To reduce this risk, Starz's political contributions concerning elections of any kind, whether monetary or in-kind, such as allowing an employee to work on a campaign while on company time or using Starz assets such as computers and other resources, must be planned, budgeted, legally reviewed and approved in advance by the Office of the General Counsel. Please send an email to ethics@starz.com to request approval.

Lobbying

Lobbying is an activity aimed at lawfully influencing public policy decisions by providing oral or written information to elected or appointed officials and their staff. Lobbying activities include both direct communication with government officials and providing support to any individual or organization who engages in such communication.

Lobbying activities, in the United States and elsewhere, are strictly regulated. Prior to engaging in lobbying activities on behalf of Starz, any team member must obtain guidance and approval from the Office of the General Counsel at ethics@starz.com.

Trade Associations

We participate in trade associations for a variety of reasons, including networking, building industry skills, civic participation and monitoring of industry policies and trends. Starz participation in trade associations, including membership on a trade association board, does not mean that Starz agrees with every position a trade association takes on an issue. Starz makes payments to these associations, including membership fees and dues.

Team member political and civic activity

We encourage team members who wish to participate, personally, in the political process in their personal capacity. However:

- it should always be clear to outside observers that these are your personal activities and that you are not representing Starz;
- using the Starz name or resources in any way that suggests that Starz sponsors or endorses your activity is prohibited; and
- team members may not engage in personal political activities during paid working hours or when using Starz resources (such as email, telephone and meeting rooms) without receiving pre-approval from the Office of the General Counsel because such activities may be an illegal political contribution by Starz.

Team members may make personal contributions from personal funds. Starz will not reimburse team members, directly or indirectly, for personal contributions or expenses.

Team members may also voluntarily participate in campaign activities but must do so on their own time, or by taking paid time off or an unpaid leave of absence. In situations where our team members wish to enter public service, the team member must comply with our policies including the conflict of interest policy.

8.0 OUR THIRD PARTIES

We do business with a range of third parties, the counterparties to our contracts (including purchase orders), such as agents, brokers, consultants, distributors, fixers, licensees, suppliers and vendors and expect them to share our commitment to doing business lawfully and ethically. We never authorize a counterparty to engage in bribery or corruption on our behalf.

We take care to know who our counterparties are by implementing our risk-based onboarding program for counterparties. To manage our bribery and corruption exposure associated with counterparties, we implement a range of controls and processes including screening, due diligence and monitoring, using a risk-based approach.

9.0 JOINT VENTURES

When considering a merger or acquisition, we conduct pre-acquisition due diligence to understand potential bribery and corruption risks associated with the transaction and take steps to address any identified issues. Where we acquire the right to control or operate a business, we conduct a post-transaction risk assessment and review and implement our Ethics and Compliance Program, including implementing this policy and associated procedures and controls.

10.0 EMPLOYMENT AND INTERNSHIPS

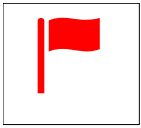
It's possible that government officials or our counterparties may request that we provide internships or employment to certain individuals. Offering internships or employment to government officials or our counterparties or to the relatives of government officials or our counterparties may be viewed as bribery.

If a candidate is interviewed for an internship or employment, the Office of the General Counsel must be notified immediately if the candidate has a relationship to a government official or a Starz counterparty and be consulted regarding the potential ethical and legal compliance implications of employing them before an offer is extended to the candidate.

11.0 RECORDKEEPING

Our books and records must be prepared accurately and honestly, not only by our accountants who prepare records of transactions but also by each of us when we create daily business records, such as expense reports and time sheets. Records must be supported by enough documentation to provide a complete, accurate, valid and auditable record of each transaction and must follow our accounting requirements and procedures.

Team members who authorize payments must accurately document the transaction and be in a position to justify their actions internally and externally. Creating an appearance of compliance but disguising the real-life purpose of an agreement or transaction is prohibited.



Recordkeeping Red Flags include:

- any undisclosed or unrecorded Starz funds, such as “off-book” accounts, for any purpose;
- misdescribing or vaguely describing an expense or payment to disguise its true nature;
- splitting up invoices to circumvent internal signatory limits;
- awarding incentives to team members with the expectation that they will be passed on to Starz’s counterparties;
- disguising discounts as “special bonuses,” “marketing reimbursements,” or “refunds” when such terms do not reflect the transaction’s true nature;
- using personal funds or third parties to circumvent our procedures and controls, or to accomplish what is otherwise prohibited by this policy, our Code of Business Conduct and Ethics or any of our other policies; and
- circumventing procurement procedures.

12.0 TRAINING AND CERTIFICATIONS

As part of our ongoing commitment to anti-bribery and anti-corruption compliance, upon onboarding, team members must review and certify this policy and agree to report potential violations of this policy to the various channels identified in the policy and the Code of Business Conduct and Ethics. On a periodic basis, we use a risk-based approach to require relevant team members to repeat the process.

- In addition, we require periodic training to educate team members about their obligations and Human Resources retains attendance records.
- The Office of the General Counsel may require that certain team members receive additional specialized training because of the nature of their role and responsibilities to Starz.
- The Office of the General Counsel may also suggest that certain counterparties receive anti-bribery and anti-corruption training as a part of the risk management protocols recommended in certain situations that may pose elevated risk.

13.0 CONSEQUENCES OF VIOLATING THIS POLICY

Conduct inconsistent with this policy and failure to promptly report known or suspected wrongdoing may result in corrective actions, up to and including suspension without pay, loss of merit increases or annual incentives and termination of employment. Violations are also documented in your employment file.

14.0 NON-RETALIATION

Starz does not tolerate any form of retaliation against team members who, in good faith, seek guidance, raise concerns about actions that may be inconsistent with our Code of Business Conduct and Ethics, our policies and/or applicable laws, or who assist in an investigation of suspected wrongdoing.

We comply with applicable laws on retaliation which may prohibit blatant actions, such as firing, transferring, demoting or public attacks, as well as more subtle forms of retaliation, such as avoiding someone, or leaving them out of professional or social activities. Prohibited forms of retaliation may include actions taken both by people leaders and team members.

15.0 ASKING QUESTIONS, SEEKING ASSISTANCE AND REPORTING VIOLATIONS

We depend on you to let us know if you see or learn something that suggests that this policy, our Code of Business Conduct and Ethics and/or the law has been violated. Your people leader is a good starting point for any questions or concerns you might have about this policy, our Code of Business Conduct and Ethics and other Starz policies. If you are not comfortable speaking with your people leader, you may contact any of the following:

- Office of the General Counsel: ethics@starz.com or mail a letter to Starz Entertainment Corp., 1647 Stewart Street, Santa Monica, California 90404, Attention: Office of the General Counsel;
- Your HR Business Partner;
- Audit & Risk Committee of the Board of Directors, if the matter relates to Starz's accounting, internal accounting controls or auditing matters by mailing a letter to: Starz Entertainment Corp., 1647 Stewart Street, Santa Monica, California 90404, Attention: Chairman of the Audit & Risk Committee of the Board of Directors; or
- Ethics & Compliance Hotline, managed by an independent third party, available 24/7, which allows you to remain anonymous. To reach the Hotline:
 - Call the toll-free telephone number (US and Canada: +1-866-921-6714; for all other locations, please submit your report online);
 - Visit: <https://www.integritycounts.ca/org/Starz>

Related Policies

Code of Business Conduct and Ethics
Gifts and Entertainment Policy

Policy Owner:	Office of the General Counsel
Date Originally Issued:	[xxxxx xx, 2025]
Last Date Reviewed:	[xxxxx xx, 2025]
Last Date Amended:	[xxxxx xx, 2025]