STARZ

STARZ ENTERTAINMENT CORP.
DISCLOSURE POLICY

Objective

Starz Entertainment Corp., together with its subsidiaries (the "Company," "we," "us" or "our"), is committed to full and fair disclosure of information that outsiders need to make reasoned investment decisions about our securities. Our policy is to provide factual information about our business and our strategic objectives, on a consistent basis, to enable investors to reasonably gauge the performance of our company as a whole. We comply with the laws and regulations governing publicly traded securities, including Regulation FD adopted by the Securities and Exchange Commission (the "SEC"), the regulations of Canadian Securities Administrators ("CSA") and the rules and regulations of the Nasdaq Stock Market LLC ("Nasdaq").

We release information regularly through SEC and CSA filings, press releases, our annual report to shareholders, and conference calls open to the public. At times we also discuss publicly available information during telephone calls and in-person meetings with shareholders and the financial community.

Scope

This disclosure policy (this "Policy") applies, as applicable, to all employees, officers, consultants/independent contractors, business affiliates, and where specified , directors of the Company, in their capacities as such, and addresses oral and written communications with financial analysts, financial institutions, securities brokers and dealers, existing and potential investors and the media. If you are in doubt as to whether someone is covered by this Policy, then you should either (i) assume that the person is or (ii) contact the Company's Office of the General Counsel for guidance. Such communications may include, but are not limited to, management presentations, telephone conversations and interviews given by executives.

Investors, analysts and the media often want to speak with our management, and we make executives available for such conversations as appropriate, but these meetings will not be a forum for sharing non-public information.

Material Non-Public Information

The Company prohibits the disclosure of material non-public information regarding the Company except in accordance with the Company's policies including this Policy. The Company expects all of the Company's officers, directors, employees, temporary staff, contractors and consultants to comply with the applicable laws and regulations concerning the use and disclosure of material non-public information. For purposes of this Policy, "material" and "non-public" are as defined in the Company's Insider Trading Policy.

Disclosures to the Investment Community

Disclosures of material non-public information to the investment community must be coordinated with the Company's Investor Relations department and shall be made in one or more of the following methods:

- a press release that is distributed in a manner designed to ensure wide dissemination;
- a conference call and/or webcast or other meeting that is designed to provide broad, non-exclusionary distribution of the information to the public and to which the public has been provided adequate notice of the call/meeting and reasonable means for accessing it;
- a filing on Form 8-K with the SEC, as determined by the Office of the General Counsel;
- any other means that after consultation with the Office of the General Counsel is deemed to be a recognized channel of distribution which provides broad, non-exclusionary distribution of information to the public in a manner satisfying the requirements of Regulation FD, including possible website disclosure or disclosure through recognized social media channels; or
- any combination of the foregoing methods.

Confidential Information

"Confidential Information" is all non-public information (including personal and proprietary information) entrusted to or obtained by Starz officers, directors and employees by reason of or in connection with his or her position with the Company. It includes, but is not limited to, non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed, such as:

- non-public information about the Company's financial condition, prospects or plans, its marketing and sales programs and research and development information, as well as information relating to mergers and acquisitions, stock splits and divestitures;
- non-public information concerning possible transactions with other companies or information about the Company's customers, suppliers or joint venture partners, which the Company is under an obligation to maintain as confidential;
- non-public information about discussions and deliberations relating to business issues and decisions, between and among Starz Personnel; and
- non-public information that might be of use to the Company's competitors, or harmful to the Company or its clients, if disclosed.

"Non-public information" is generally information that has not been the subject of any press release or otherwise disseminated to the public at large, including financial, business, operational, and product information.

Confidential Information may not be discussed by employees, officers, consultants/independent contractors, business affiliates with anyone, including other Starz officers, directors or employees or consultants/independent contractors, customers, suppliers, competitors, shareholders, or any other person or entity (collectively, "Third Parties," and as to each, a "Third Party"), except when required in the normal course of the Company's business solely to promote legitimate business interests of the Company, and with prior authorization from your supervisor or as is legally permitted and/or mandated. The obligation to protect Confidential Information continues after you leave the Company or are no longer engaged by the Company as a Third Party. At no time may Starz officers, directors or employees or a Third-Party disclose Confidential Information (including letters, memos, and internal Company documents) to any person, firm, or entity to further their own interest. Nor may Starz officers, directors or employees or a Third-Party access the Confidential Information of supervisors or other Starz officers, directors or employees of the Company.

- If a Starz officer, director or employee or a Third-Party releases Confidential Information (including, but not limited to, documents) in violation of this Policy, he or she may, in addition to the immediate termination of his or her employment or engagement, as applicable, be subject to civil or criminal liability, or both, as provided by law.

- It is best to refer all inquiries regarding Confidential Information to your supervisor. If you are unsure whether information is confidential, you are required to ask your supervisor, while a Third Party should consult with the person to whom he or she submits their work.

Pursuant to their fiduciary duties of loyalty and care, directors and officers must protect and hold confidential all Confidential Information in their possession, unless they have express or implied permission from, or an agreement with, the Company or an authorized agent of the Company or the Board to disclose such information. However, directors, officers, the Company and the Board will comply with the SEC's Regulation FD at all times. Unless a director or officer has such permission or authorization or as otherwise required by appliable law or regulation, no director or officer will use Confidential Information in violation of his or her fiduciary duties to the Company.

A violation of this established Company standard may subject the director or officer to consequences, including removal or dismissal.

Use of Social Media

Use of social media, including corporate blogs, employee blogs, chat boards, Facebook, LinkedIn, Instagram, Snapchat, X, Tik-Tok, YouTube and any other non-traditional means of communication, to disclose material non-public information is considered selective disclosure and would violate this Policy. From time to time, the Company may take steps in accordance with guidance provided by the SEC and CSA to have certain social media channels established as a recognized channel of distribution which provides broad, non-exclusionary distribution of information to the public in a manner satisfying the requirements of Regulation FD. Any disclosure of material non-public information through such designated social media channels must be coordinated with the Investor Relations department.

Authorized Spokespersons for Disclosures to the Investment Community

Only the following people (each an "Authorized Spokesperson") may discuss material information with the institutional and individual investment community:

- Head of Investor Relations;
- Chief Executive Officer;
- Chief Financial Officer; and
- General Counsel.

Other employees may be designated by any of the Authorized Spokespersons for a limited, specific communication only, including but not limited to an investor conference, a group meeting or a one-on-one meeting. Following the occurrence of the limited, specific communication, the employee's designation shall expire.

Employees and Company representatives (other than the Authorized Spokespersons) receiving any inquiries from the investment community shall not respond to such inquiries other than to refer the inquirer to Investor Relations.

All meetings with members of the investment community shall be attended by at least one of the following: (i) Chief Financial Officer; or (ii) Head of Investor Relations. Exceptions to this Policy may be authorized only by an Authorized Spokesperson.

Disclosures to Audiences Other Than the Investment Community

Disclosures of material non-public information to audiences other than the investment community, including the press and industry consultants, shall be consistent with disclosures to the investment community and shall be discussed only by the Authorized Spokespersons or by other company executives and employees as designated by any of the above, or to any other person or entity or in connection with any offering excluded from the application of Regulation FD.

Public Disclosures of Forward-Looking Information

All public disclosures of forward-looking information, including projections of future earnings or operational performance, shall be accompanied by appropriate cautionary language invoking the safe harbor under the U.S. Private Securities Litigation Reform Act. Such language shall be prepared by the Office of the General Counsel or outside legal counsel.

All public disclosures of forward-looking information must be approved by the Office of the General Counsel.

Subsequent disclosures of forward-looking information may only be based upon (i) information our Company has publicly disclosed, (ii) non-material information, whether in the public domain or not, and/or (iii) industry-related information.

Except to the extent imposed by law, we shall not undertake any obligation to update any forward-looking information, and we will not respond, except by means of an appropriate public disclosure as provided herein, to any inquiries or rumors seeking reaffirmation of such information at any date subsequent to the date the information was originally provided.

Disclosure of Material Non-Public Information in Advance of Public Announcement

Any disclosure of material non-public information by an Authorized Spokesperson that is made in advance of the public announcement of such information shall only be made pursuant to an appropriate confidentiality arrangement or to a person who owes a duty of trust and confidence to our Company, such as an attorney, investment banker or accountant retained by us. Other communications that are specifically exempted from the disclosure requirements of Regulation FD include disclosures made to a credit rating entity, provided that the disclosure is made solely for the purpose of developing a credit rating and the ratings are publicly available; and communications made in connection with a registered securities offering other than offerings expressly excluded under Regulation FD.

Review of Draft Analysts' Reports and Financial Models

Draft analysts' reports and financial models may be reviewed and commented upon only by the Authorized Spokespersons for disclosures to the investment community. All comments to draft analyst reports or financial models should be coordinated with the Chief Financial Officer. Comments on these drafts will be limited to the following:

- corrections of inaccurate historical public information;
- deviations from information and projections we have publicly issued, specifying, without reaffirming, the date and/or occasion of such issuance; and
- industry-related information.

It should specifically be noted that our Company has not undertaken the obligation to update any forward-looking statement that it makes or has made, and that our Company, as a matter of policy, does not "embrace," "endorse," or state that it "is comfortable with" any analyst's report and/or financial model as a result of our review process.

Disclosure of Quarterly Earnings and Public Conference Calls

With respect to quarterly earnings, we will issue a press release through widely circulated news and wire services or through any method reasonably designed to effect broad, non-exclusionary distribution of the information. In addition, we may conduct a public conference call or publicly noticed Internet webcast, which will be publicly announced in advance, and we will provide public access information for each scheduled public conference call or Internet webcast. Before the conference call or Internet webcast, we will furnish our quarterly or annual written earnings release to the SEC on a Form 8-K. Anyone may listen to the call by telephone or webcast. We may allow a limited group to ask questions on the conference call, as long as all listeners can hear the questions and answers. Thereafter, we will make an audio recording of the conference call publicly available through our website or an outside service for approximately one week following the call. After this time, the call will be taken down so that the information does not become outdated.

As needed from time to time, we may hold topical investor conference calls or Internet webcasts open to the public and media, and follow a procedure similar to our quarterly earnings conference calls.

Speeches and Other Public Presentations

Disclosure of material non-public information by persons covered by this Policy through participation in speeches, interviews or conferences is prohibited. Except as provided below, Authorized Spokespersons/Investor Relations must approve all Company speaking engagements and audiovisual presentations in advance. The following procedures and restrictions will apply to each such engagement or presentation:

- the content of any speech or presentation must be approved by an Authorized Spokesperson prior to disclosure;
- the presenter will provide to the Authorized Spokespersons/Investor Relations a complete copy of such presentation to document its content as given; and
- the presentation will not include material nonpublic information about the Company unless the presentation complies with Regulation FD.

Presentations regarding the Company made in the ordinary course of business and containing only pubic information do not require advance approval.

Investment Bank Conferences/Road Shows

Authorized Spokespersons and their designees must be mindful of the requirements of Regulation FD and their obligations under this Policy at all investor conferences, such as those sponsored by investment banks, on road shows (other than road shows undertaken in connection with a public offering of the Company's securities that are not subject to Regulation FD) and at other similar events. Material non-public information should not be disclosed at these events, including during any "break out" or question-and-answer sessions, unless reasonable means have been provided to enable the public to access the event by webcast or other similar means in a manner that is designed to provide broad, non-exclusionary distribution of the information to the public and to which the public has been provided adequate advance notice.

If it is determined that material non-public information will be disclosed during any such conference, road show or other similar event and the event will not be accessible to the public in a Regulation FD compliant manner as described above, the Company shall disclose prior to the event, either through the filing of a Form 8-K, a press release or any other Regulation FD-compliant method, any material information that is not already public and which is expected to be discussed or presented at the event. If it is determined that material non-public information may have been disclosed unintentionally during the conference, road show or other similar event, the Chief Financial Officer, Head of Investor Relations and the Office of the General Counsel should be notified immediately.

Responding to Market or Media Rumors

Employees and company representatives (other than the Authorized Spokespersons) receiving any inquiries regarding market or media rumors shall not respond to such inquiries other than to refer the inquirer to Investor Relations. Whether or not a rumor has any basis in fact, it is our policy to respond to any market or media rumors by saying, "Our policy is not to comment about rumors or speculation." Such market or media rumors may be from Internet "chat" sessions or threads where anyone with Internet access can post questions or answers about companies and their stock. Our policy is not to comment or respond to these types of online discussions even if the information is incorrect or speculative. We follow this approach consistently to avoid providing an implied confirmation or denial in other circumstances. Anyone with a question about these matters should immediately contact the Head of Investor Relations or the Office of the General Counsel.

Company "Quiet Period"

To avoid the potential for selective disclosure, we may observe "quiet periods" when material changes are pending. If we choose to observe a quiet period, during that time we will not initiate any meetings or telephone contacts with analysts and investors but will respond to unsolicited inquiries concerning publicly available or non-material information.

Information Not to be Disclosed

In addition to the aforementioned policies pertaining to the disclosure of material non-public information, unless required by law, our policy is to avoid disclosing ***any*** information related to the Company that could be considered:

- very useful to a competitor, to someone negotiating with our Company, or to a company involved in litigation with us;

- contrary to senior management statements on strategy, the state of current business, or the business outlook;
- an embarrassment to us, or our affiliates or business partners; or
- unfair disparagement to competitors.

The above is not an exhaustive list but is intended to be illustrative of the nature of information that should additionally not be disclosed.

Unintentional Disclosure of Material Non-Public Information

If a Company employee believes that there may have been an accidental or unintentional disclosure of material non-public information, the employee must immediately notify the Head of Investor Relations and the Office of the General Counsel of the incident. We will then determine whether to promptly file on Form 8-K and/or issue a press release or pursue other means, including possible website disclosure or disclosure through recognized social media channels, to fully disclose this information in accordance with Regulation FD.

Failure to Comply

Any person who communicates about the Company or our business with analysts, investors, potential investors, stockholders, media, or any other member of the public without the prior consent of the Company or an Authorized Spokesperson, or who otherwise discloses information in violation of this Policy, may be subject to a disciplinary action. If you believe a failure to comply with this Policy has occurred, please immediately contact the Head of Investor Relations and the Office of the General Counsel to confidentially report the incident.

Communication and Disclosure of this Policy

In addition to including this Policy on our internal website, this Policy will be circulated to all corporate officers on an annual basis. Also, our Company will post this Policy on the "Investors" or "Investor Relations" portion of our public website for reference by the investment community and the general public.

Further Information

All inquiries regarding the procedures associated with this Policy should be directed to the Office of the General Counsel.

Nothing in this Policy prohibits employees from engaging in concerted activity protected by law, such as communications between employees about wages, hours, or other terms and conditions of employment, or to engage in other activity that is protected by federal, state, or local discrimination or employment laws. Nothing in this Policy is intended to interfere with or discourage a good-faith disclosure to any governmental entity related to a suspected violation of the law. Employees do not need the Company's prior authorization before speaking with these governmental entities, and they are not required to notify the Company that they have spoken with these entities. Also, an individual may not be held criminally liable or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a suspected violation of law. An individual may not be held criminally liable or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in a complaint or other document filed in a lawsuit or other proceeding, if the filing is made under seal. An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual's attorney and use the trade secret information in the court proceeding, if the individual (i) files any document containing the trade secret under seal; and (ii) does not disclose the trade secret, except pursuant to court order.

Other Policies, Code of Business Conduct and Ethics Not Affected

Nothing contained in this Policy shall limit or affect the application of other policies and procedures of the Company applicable to directors, executive officers, employees and other representatives of the Company, including without limitation the following:

- Corporate Governance Guidelines;
- Insider Trading Policy (which governs exclusively as it relates to matters of trading in securities and related matters addressed by that policy); and
- Code of Business Conduct and Ethics.