

Purpose and Overview

INTEGRITY MATTERS.

Ethical business practices send a message to our audiences and business partners that they can put their trust in us. By doing the right thing, we protect our reputation and help the production thrive.

This production ethics policy provides standards for: ensuring compliance with applicable laws, regulations and production policy; promoting integrity and the highest standards of ethical conduct; and helping us avoid even the appearance of anything improper in our business activities.

Who Must Follow This Code

This policy applies to all members of the production, including both “above the line” and “below the line,” non-supervisory staff, crew, supervisors, managers, department heads, talent, producers, directors and executives. It applies everywhere we do business and any time anybody represents the production. As a production member, you have a responsibility to:

- Act with integrity, especially when making difficult decisions;
- Familiarize yourself with this policy and the laws and policies applicable to you, your job responsibilities, and your location;
- Complete required training in a timely manner;
- Keep up-to-date on our standards and expectations;
- Seek guidance whenever you encounter a situation where how to “do the right thing” is unclear;
- Promptly report concerns about conduct that may be inconsistent with this policy, other production policies or the law—do not undertake an investigation on your own; and
- Cooperate and tell the truth when participating in an investigation, audit or other inquiry.

Additional Responsibilities of Supervisors

If you are responsible for supervising others, you have the additional responsibility to:

- Be a role model and lead by example every day;
- Seek help and guidance whenever needed;
- Support your team and all coworkers when they ask questions and raise concerns;
- Create an environment where individuals feel comfortable speaking up;
- Listen and respond to concerns when they are raised;
- Know when and how a question or concern should be escalated to your production People & Culture, legal, or safety teams;
- Make sure that no one who speaks up or raises a concern or complaint suffers retaliation; and
- Look for opportunities to reinforce these principles with your team.

Violations of this policy, other production policies, and/or applicable laws, by any member of the production, are subject to disciplinary action up to and including termination of employment/engagement, financial damages, and criminal prosecution.

Complying with Laws and Regulations

We are committed to full compliance with all laws and regulations that apply to our production. In the course of your day-to-day business activities, use good judgment and seek help when necessary. When in doubt, seek guidance from your “Production HR” People & Culture team.

Making the Right Choice:

Remember that when you have a tough choice to make, you’re not alone. There are resources available to help you, and it is always appropriate to ask for help.

Ask yourself:

- Is the action consistent with this policy, other production policies, and high ethical standards?
- Could it be illegal?
- Would I feel comfortable if senior production management or Warner Bros. Discovery officials knew about it?
- Would I feel comfortable if my family and loved ones knew about it?
- Would I feel comfortable if my decision or my actions were made public?
- Is it the right thing for our reputation? For my reputation?

If you answer “No” or “I’m not sure” to any of these questions, you should immediately pause your decision-making and seek guidance from the People & Culture team.

Asking Questions and Reporting Concerns

Seek guidance when “the right thing to do” is unclear and report legal or ethical concerns when they arise.

You should:

- Contact the People & Culture, legal, or safety teams; and/or
- Call the Warner Bros. Discovery ethics hotline (the “Hotline”) toll-free at 1-800-398-6395 or visit wbd.ethicspoint.com. The website lists toll-free numbers for all locations in which Warner Bros. Discovery has offices. Anonymous reports will be accepted where permitted by law. You may also consult the Warner Bros. Discovery safety hotline at 1-877-566-8001 or visit www.safetyontheset.com.

We will make every reasonable effort to ensure that your concerns are addressed appropriately. Reports from outside the U.S. may be subject to the laws of the country in which the reporting person works. We will handle all reports, including anonymous reports, in accordance with local privacy regulations and other applicable laws.

Cooperating with Investigations and Audits

We take seriously allegations of misconduct and initiate investigations to eliminate any misconduct, remediate its impact, and, when appropriate, take disciplinary action.

All production members are expected to fully cooperate with production-related internal and external investigations, audits and other inquiries.

Remember:

- Never destroy, alter or conceal any document (including text and chat messages, for example) in anticipation of or in response to a request for documents.
- Never provide or attempt to influence others to provide incomplete, false or misleading statements to an investigator.

Our Non-Retaliation Policy

We do not tolerate retaliation against any person who, in good faith, seeks guidance, raises concerns (including formal complaint(s)) about actions that may be inconsistent with this policy, other production policies or the law, or participates in an investigation of suspected wrongdoing.

Reporting “in good faith” means making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.

You may also communicate in good faith with a Government Agency regarding a possible violation of the law.

A Government Agency includes any provincial, federal, state or local governmental agency, commission or tribunal that enforces workplace-related laws, rules, or regulations.

Statement on Whistleblowing

In communicating with a Government Agency, you may:

- Report a possible violation of law;
- Participate in any investigation or proceeding conducted by any Government Agency, including by providing documents or other information; or
- File a charge or complaint with a Government Agency.

Diversity, Equal Opportunity and Non-Discrimination

You are our most valuable asset, and we are committed to a work environment where all persons are treated fairly and with respect, and where everyone is given an opportunity to succeed. As such, we are committed to creating, managing, and valuing diversity and inclusion in our workforce.

The Company is committed to providing equal employment opportunity and prohibits all forms of unlawful discrimination based on legally-protected characteristics.

We make reasonable accommodations for qualified individuals with known disabilities or in other circumstances as required by local law.

Safe and Healthy Work Environment

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. Situations that may pose a health, safety or environmental hazard should be reported immediately, without fear of reprisal. You may contact the Warner Bros. Discovery safety hotline at 1-877-566-8001 or visit www.safetyontheset.com.

Alcohol and Substance Abuse

While at work or conducting production-related business, including off-site or after-hours events (such as premiere, finale, wrap, and holiday parties), do not use, possess or be under the influence of illegal drugs or any substance that could lead to impairment, interfere with a safe and effective work environment or harm our reputation. You are expected to exercise good judgment at events where alcoholic beverages are served and should not consume alcohol in a way that leads to impaired performance or inappropriate behavior, endangers safety, harms our reputation, or violates law.

Serving alcohol at a production event at a Warner Bros. Discovery site (such as the Studio Lot) requires advance approval from your People & Culture team.

Workplace Violence

Violence of any kind will not be tolerated, including but not limited to:

- Intimidating or hostile behavior;
- Causing, threatening, or attempting to cause physical injury or damage to another person's life, health, well-being, family or property;
- Acts of vandalism, arson, sabotage or other criminal activities; and
- The carrying of weapons unless you have obtained the necessary licenses and permits, you are authorized by production management, and it is legal to do so.

Remember:

- Comply with our policy on workplace harassment and workplace violence to promote a safe, ethical and professional workplace.
- Help by speaking out, if it is safe to do so, when a coworker's conduct makes others uncomfortable.
- Report sexual harassment, including any requests for sexual favors or other unwelcome verbal or physical conduct of a sexual nature.
- Demonstrate professionalism. Do not visit inappropriate Internet sites or display sexually explicit or offensive pictures.
- Observe safety, security and health rules & practices that apply to your job.
- Notify your supervisor and the People & Culture team immediately about any unsafe equipment or any situation that could pose a threat to health or safety or damage the environment or call the Warner Bros. Discovery safety hotline at 1-877-566-8001 or visit www.safetyontheset.com.

Harassment-Free Workplace

We do not tolerate harassment or other abusive behavior; any unwelcome conduct is unacceptable. Harassment is defined based on your local laws, but is typically considered to include unwelcome verbal or physical conduct, directed at an individual, based on protected characteristics, that violates a person's dignity, disrupts a person's work performance or creates an intimidating, offensive, abusive or hostile work environment.

We are mindful that jobs in the entertainment industry may include or require exposure to discussions and material that are sexually explicit, contain nudity or partial nudity, or otherwise relate to topics that

would be inappropriate for other workplaces. In keeping with its commitment to a harassment-free workplace, we expect that any such discussions or materials on our production will not be directed at a person because of that individual's sex, gender, race, sexual orientation or other protected characteristics. If any person associated with the production becomes uncomfortable with discussions or other activities related to the creation, production or distribution of our filmed entertainment products, that person should discuss the issue with the People & Culture team immediately.

A common form of harassment is sexual harassment, which in general occurs when:

- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions, such as a request for a date, a sexual favor or other similar conduct of a sexual nature; or
- An intimidating, offensive or hostile work environment is created by unwelcome sexual advances, insulting jokes or other offensive verbal or physical behavior of a sexual nature.

Respecting Human Rights

We respect the human rights and dignity of all, including laws that promote and protect human rights and prohibit slavery and human trafficking. Report any suspicion or evidence of human rights abuses in our operations or in the operations of our suppliers to the People & Culture team. This includes promoting diversity, accommodating disabilities, and doing our part to protect the rights of everyone with whom we transact.

Environmental Responsibility

We are committed to operate in an environmentally responsible and sustainable manner. We follow applicable laws and regulations related to the environment. We strive to follow best practices and minimize our environmental impact in ways that are relevant to our business and important to the communities we serve.

Integrity of Financial Records and Public Disclosure

The integrity of our financial records is necessary for compliance with accounting, tax and public disclosure laws and regulations and other requirements. Individually, we are all responsible for recording clear, accurate and honest information in all production records, such as time sheets, expense reports and financial statements.

If you have any concerns about questionable accounting or audit matters, you should immediately contact the production's Legal team or the ethics hotline. You may submit your concerns anonymously where permitted by law. When in doubt, speak up. We will not tolerate any acts of retaliation for good faith reports of accounting or audit concerns.

Insider Trading

Do not buy or sell securities when in possession of material, non-public information (aka "inside information"), and do not share such information with others for any improper purpose. Unauthorized disclosure of such information is also prohibited. Remember that even casual conversations could be viewed as illegal "tipping" of inside information. Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy, sell or hold a stock.

Misuse of Funds and Fraud

We are each personally responsible for safeguarding production assets and making sure that production resources are used responsibly and appropriately. Do not use production resources to engage in fraud, theft, embezzlement, misappropriation, money laundering, tax evasion or any other action that violates applicable laws and regulations. Involvement in such activities undermines our integrity, damages our reputation and exposes the production and the individuals involved to severe penalties. Additionally, only use facilities, materials and equipment for authorized purposes related to your job and be sure to report any suspicious financial transactions and activities to the production's legal team.

Gifts & Entertainment

Never accept or offer gifts or entertainment when doing so may improperly influence or appear to influence another party's business decisions.

A gift is anything of value, which can include meals, entertainment, hospitality (travel, accommodations), and tickets to sporting or music events. Gifts can also include intangible items such as discounts, services, special privileges, benefits and rights given to a person without compensation or payment in return. Cash gifts, including cash equivalents such as gift cards redeemable for cash, are prohibited and should not be offered or accepted under any circumstance.

In general, more expensive gifts are more likely to cause a conflict of interest. Thus, you need approval from the legal team to accept or give a gift worth more than \$500 USD (subject to lesser amounts imposed by your department, applicable law or location). The \$500 USD limit applies not just to one-time gifts, but all gifts to or from the same source during any 12-month period. For example, a \$60 USD gift given to or received from a vendor may be okay, but giving or receiving a \$60 USD gift every month for a year to or from the same vendor may not.

And, remember, even smaller gifts can create a conflict, so always use your best judgment and consider how offering or accepting a gift may appear to others. For more information on gifts and business entertainment, including when advance approval is required, please consult the production's legal team.

Conflicts of Interest

A conflict of interest arises when a personal or family interest interferes with your ability to make sound, objective business decisions. We are all expected to act in the production's best interests and avoid situations that create actual or potential conflicts of interest.

Despite the best of intentions, even the appearance of a conflict can be harmful to our production. While it is impossible to address every situation that could create a potential conflict of interest, some of the most common situations involve gifts and entertainment, providing service to other companies, financial interests in other companies, and personal relationships at work.

Financial Conflicts of Interest

A conflict of interest may arise if you have a financial interest in a partner or competitor of the production, especially if you are in a position to influence whether our production transacts business with the other entity. You are responsible for making sure that your investments in – or relationships with – other entities do not cause a real or apparent conflict between your personal interests and those

of the production, and you must disclose them on a conflict of interest form if there is any possibility they might do so.

Providing Service to Other Companies

While engaged on the production, any outside work you perform must not conflict with your work on the production, and you must never share the production's confidential information, or use production resources, when performing outside work.

When in doubt, consult with the People & Culture team.

Examples of situations that may give rise to a potential conflict of interest include:

- Moonlighting (i.e., working elsewhere while working on this production);
- Any financial interest in a competitor or an entity that does business with the production, particularly if you are in a position to influence our business relationship with the other entity;
- Accepting lavish gifts or invitations from a potential vendor or business partner;
- Selecting a vendor with whom you have a personal relationship;
- Dating or engaging in a romantic or sexual relationship with another member of the production;
- Using information learned as part of your job to benefit yourself or anyone else; or
- Being in a position to influence the employment, advancement, or hiring of someone with whom you have a personal relationship.

Personal Relationships at Work

To avoid a conflict of interest, you must disclose promptly on a conflict of interest form any person associated with the production with whom you have a personal relationship if:

- you are in any position to influence that person's terms and conditions of employment/engagement, advancement or hiring, or,
- you are in a position to influence whether the production engages or transacts with any business entity the person is associated with or has a financial interest in.

If you are not sure whether a particular situation creates a possible conflict of interest, your best course of action is to consult the production's legal team. In any event, you must follow production's guidance with respect to the resolution of any potential conflict.

Anti-Bribery & Anti-Corruption

We strictly prohibit giving, offering, authorizing or taking bribes in any circumstance. This includes bribery of private individuals, as well as bribery of government officials. Such actions are unethical, illegal and will not be tolerated. This includes the conduct of business partners acting on our behalf (including agents, consultants, partners, joint ventures and other entities).

So, choose and monitor third parties carefully, and never ask someone to do something that you are prohibited from doing yourself. For more information, please consult with the production's legal team.

A bribe is the offering, giving, receiving or soliciting of something of value for the purpose of influencing the judgment or conduct of another. Bribes can take the form of money, gifts, loans, facilitation or "grease" payments, charitable donations, services or favors.

You must obtain advance approval from the production's legal team before you do any of the following:

- Promise or give anything of value (such as gifts, money, entertainment or travel) to a government official either directly or through an intermediary.
- Transact business (e.g., hire, enter into a joint venture or partnership or invest) with a government official.
- Hire an agent, representative, consultant or other third party, or enter into any joint venture, partnership or investment, to work for the production that may involve making a payment to, or otherwise transacting business with a government official.

A government official is a broadly defined term that includes, but is not limited to, individuals who work for or on behalf of government agencies, state-owned or controlled entities, or public international organizations; persons elected/appointed to a government position; royal family members, and candidates for public office. As such, consult the production's legal team if you are ever in doubt about whether a person may be considered a government official. When working with agents – especially in countries with a history of corruption – be aware of the following warning signs:

- The agent refuses to certify that they will follow anti-corruption laws.
- The agent is, or has family ties to, a government official.
- The agent lacks or appears to lack the resources or skills to perform the services.
- The agent says that payments are needed to “get the job done” or “maintain good relations.”
- A potential government customer requests a particular agent.
- There are excessive commission or “success fees.”
- The agent wants payments in cash or in an account in another country.
- The agent's invoices are false, misleading or incomplete.

If your responsibilities include international business activities or transactions, exporting or importing assets, or overseeing others who engage in these activities, make sure you know and comply with all applicable requirements. Direct any questions you have regarding these activities to the production's legal team.

Antitrust and Fair Competition

We believe in free and open competition. Antitrust and competition laws are complex, and compliance requirements can vary depending on the circumstances, so seek guidance from the production legal team with any questions about what is appropriate and what isn't.

Remember:

- Don't talk with competitors about hiring, setting prices, bidding for rights, negotiating with partners in common or dividing up customers, suppliers or markets.
- Don't take actions that are motivated solely by the desire to drive a competitor out of business. Instead, strive to compete aggressively to provide the best products and services at the best prices.
- Avoid the following and, if you see or suspect that anyone is engaging in these activities, report it:

- Sharing our competitively sensitive information or that of our partners or other third parties with a competitor;
- Obtaining, or attempting to obtain, nonpublic information about competitors, including from new hires or candidates for employment/engagement; and
- Accepting information about competitors when unsure if it is protected by a confidentiality agreement or policy or as a trade secret.

Protecting Confidential Information and Intellectual Property (IP)

Confidential information is any information, in any form, pertaining to the production that is not available to the public. You should never disclose internal, confidential information. This means keeping it secure, limiting access to those who have a need to know in the performance of their job, and only using it for authorized purposes. Similarly, we must respect the confidential information and intellectual property rights of third parties. Improper disclosure of confidential information or misuse of intellectual property, either directly or indirectly, may lead to disciplinary action up to and including termination. Be aware that your obligation to protect confidential information and intellectual property continues even after your work on our production ends.

Examples of our confidential information and/or IP include:

- Show or film ideas, titles and the shows and films themselves;
- Our brands and logos, and the trademarks and/or copyrights in them;
- Business and marketing plans;
- Methods, know-how and techniques;
- Systems, software and technology; and
- Other copyrights, trademarks and patents.

Seek guidance from the production legal team if you have any questions about the use and protection of confidential information and IP, or if you become aware of a material infringement of the Production's IP.

Piracy

Piracy is the unauthorized streaming, uploading, downloading and copying of movies, television shows, games, music, or any other copyrighted material. It is illegal. Engaging in it is a violation of this policy, rendering you subject to discipline, including possible termination.

Data Privacy

Follow our policies and all applicable laws in collecting, accessing, using, storing, sharing and disposing of personal information, particularly sensitive information. Make sure you know the kind of information that is considered personal information, and only use it—and share it with others—for legitimate business purposes or under another lawful basis for processing, according to the applicable data protection laws.

Personal information (also called “personal data”) includes any information that relates to an identifiable person, such as personal contact information (e.g., phone number, email address) or date of birth. Some types of personal information are considered particularly sensitive, such as financial information, personal health information, personal identification numbers and information about

children (and in certain jurisdictions sensitive information also includes other personal characteristics, such as race/ethnicity, philosophical beliefs, trade union membership and religious affiliation).

Communicating with the Public

Given our desire for a consistent voice when issuing public statements about the production, it is important that only authorized persons speak on behalf of our production. Do not speak “off the record” to journalists or other persons who ask you for information about the production without the prior approval and guidance of the production’s legal team.

Using Social Media

If you have an active social media or online presence, you must not give the impression that you are speaking on the production’s behalf unless you are expressly allowed to do so. Also, if you post about the production or about what we do, be careful about using the production’s or any third party’s intellectual property and do not do so without permission. Even if you are authorized to post about the production, you should be transparent about the fact that you work on this production and include a disclaimer clarifying that your views are your own and do not represent the production’s perspective.

Do not post or share nonpublic information about the production, even if your intent is to “set the record straight.” Your posting might be misinterpreted, start false rumors or be inaccurate or misleading. Instead, contact the production’s legal team.

Political Activity

You have the right to voluntarily participate in the political process, including making personal political contributions and engaging in personal volunteer political activity. However, to the extent you are speaking on the production’s behalf or representing the production, you must not give the impression that your personal political views and actions are those of the production, and you must not use production funds or resources for any political purpose without proper authorization. Personal political activities should be conducted outside of work and employees must not use Production resources (e.g., funds, staff time, office supplies, facilities or space) for personal political activities.

Production Resources and Property

Be alert for theft, fraud, waste and misuse of production resources, including funds, facilities, equipment, networks, information systems (including email and voicemail) and supplies. Raise any concerns with our People & Culture or legal teams.

Remember:

- Never use production resources for activities that are improper or illegal.
- Use production funds allocated to you only for permitted purposes.
- Be a good steward of our equipment, networks, and information systems.
- Do not use production equipment to create, store or send pirated content or content that others might find offensive.
- Do not share passwords or allow other people, including friends and family, to use them.
- Do not leave devices storing production information unattended.

Conclusion

Nothing in this policy or in any of our policies is intended to limit or interfere with your right to engage in activities protected under Section 7 of the U.S. National Labor Relations Act or similar local laws, such as discussions related to wages, hours, working conditions, health hazards and safety issues. The provisions of this policy are in addition to, and do not modify, replace or supersede other production policies or procedures. We reserve the right to modify this policy at any time, as deemed appropriate.

Consult your production office or call sheet for up-to-date contact information for your People & Culture, legal, and safety teams. You may also contact the Warner Bros. Discovery ethics hotline at wbd.ethicspoint.com or 1-800-398-6395, or the Safety hotline at 1-877-566-8001.