

ETHICS CODE OF CONDUCT

1. Introduction

At Jellyfish Pictures we believe in conducting our business with the utmost integrity, honesty, and respect for all individuals and entities with whom we interact. This code governs our business decisions and actions and displays the fundamental values we practice in our day-to-day activities.

This code applies to all individuals associated with our company, including employees, executives, directors, contractors, freelancers, and temporary staff. We expect everyone to act and take the right actions.

2. Compliance with Laws and Regulations

We are committed to complying with all applicable laws, regulations, and industry standards in the countries where we operate. This includes preventing bribery, illicit payment and corruption, insider trading laws and employment laws and practices, preventing forced labour, child labour, human trafficking, and slavery within the supply chain, and promoting fair competition. Adherence to legal requirements is essential to our business operations and reputation. It is our commitment to operate in a lawful and responsible manner.

If there are any concerns over compliance issues, please contact the Ethics Committee or submit a form via the anonymous reporting mechanism detailed in the whistleblowing procedure.

3. Integrity and Honesty

We uphold the highest level of integrity and honesty in all business dealings. This includes being truthful, avoiding conflicts of interest, and ensuring accurate representation of information.

We seek to outperform the competition fairly and honestly. We seek competitive advantage through superior performance and never through unethical or illegal business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing.

4. Respect and Inclusion

We seek to always respect, support and facilitate employees by promoting an atmosphere of inclusivity, curiosity and engagement.

We value diversity and treat all individuals with respect, fairness, and dignity. Discrimination, harassment, or any form of bullying will not be tolerated. We facilitate workplaces where everyone can engage without fear of unacceptable workplace conduct.

Our policy is to provide equal employment opportunities, support and facilitation to our employees and potential employees in all phases of employment. In order to remain competitive in today's business climate, we must actively recruit, retain and develop the most talented candidates from a wide range of walks of life, disciplines and experience. We recognise that our workforce needs to mirror our customers, stakeholders and communities, and whenever there is a regional imbalance identified we will seek to make improvements by bringing support and visibility to underrepresented groups.

It's important that all employees support our policy with respect to equal employment opportunity and facilitation, and anyone found in breach of this code will be subject to the appropriate disciplinary action.

Our suppliers and other entities along the supply chain are expected to abide by this code or the ethical rules consistent with this code, and with all applicable laws.

5. Confidentiality

Protecting sensitive information, including but not limited to customer data, proprietary information, and personal employee details, is of the utmost importance. Employees must maintain confidentiality and not disclose such information without proper authorization.

Our information and business data and the security of that information and data are crucial to our success. We must safeguard confidential information against improper disclosure both inside and outside of the business. Information that we maintain on behalf of our customers, clients, suppliers, agents or other representatives that has not been publicly disclosed should be treated as confidential. Such information, whether verbal, written, or stored on electronic media, includes non-public information on products, services, methods, systems, internal reports, analysis, production sales statistics, financial data, business plans, marketing methods and strategies.

If information has been entrusted to an employee, it is their responsibility to protect its confidentiality and limit use to what it has been authorised for. We will not tolerate acquiring confidential information about other companies unless acquired through proper means.

6. Conflict of Interest

Employees must avoid any situation that may create or appear to create a conflict between personal interests and the interests of the company. If a potential conflict of interest arises, employees must disclose it promptly to their supervisor or the people team.

Here are some examples of conflict situations:

- Entering a business relationship that could reasonably be interpreted as not being in the best interest of Jellyfish Pictures
- Marketing products or services that compete with Jellyfish Pictures
- Possessing ownership interest in a party to a transaction when in the power to influence a buying or selling decision
- Purchasing services from a company in which a family member is part-owner
- Influencing or being involved in the decision to hire a friend or relative

Officers and directors must disclose to the Ethics Committees any material financial interest (typically an interest of more than 10% of a company or other economic entity).

If you have any questions or concerns about conflict of interest, please contact the People Team or the Ethics Committee.

7. Anti-Corruption and Anti-Bribery

No Directors, officers, employees and other business partners should ever engage in bribery or other form of corruption.

Strict compliance with our anti-corruption and Anti-bribery policy is always required, and failure to comply could result in fines, penalties and criminal liability against the company and the individual committing the violation.

If you have any questions, please contact the Ethics Committee.

8. Gifts, Bribes, and Kickbacks

No Jellyfish Pictures employees should directly or indirectly seek any payment, fees, services, or other gratuities from any person, company or organisation which does, or

seeks to do, business with us.

We do not tolerate the giving or receiving of gifts, bribes, or kickbacks to influence business decisions. Employees must not accept any gift or favour that could compromise their objectivity or impartiality. Similarly, no employees shall offer any payment, fees, services, or other gratuities.

As the only exception, gifts, meals or entertainment may be received only if:

- They are ordinary, reasonable and of limited value
- They do not violate any law or generally accepted ethical standards (including the standard of the recipient or giver's organisation)
- They are consistent with acceptable business practice

9. Prohibition of child and forced labour

We will not permit work to be carried out by employees who do not meet the county's minimum legal age requirements and we apply the same prohibitions to our suppliers.

Exceptions to this rule apply to government authorised job training or apprenticeship programs that are clearly beneficial to the persons participating. Furthermore, we strictly prohibit child labour and forced labour among our operations and supply chain.

10. Anti-human trafficking and modern slavery in the supply chain

We require direct suppliers to comply with all our policies against forced labour child labour, human trafficking, and slavery within the supply chain.

We maintain internal accountability for employees or contractors to meet company standards regarding slavery and human trafficking. Employees dealing with suppliers should report any suspected or detected violation amongst the operations and supply chain via the whistleblowing procedure.

11. Health and Safety

We consider employee health and safety among the highest priorities and, as such, we will maintain procedures designed to protect the health and safety of employees whilst protecting property and assets. Everyone is required to work free of alcohol and controlled substances in compliance with locally applicable laws and rules - except for substances taken in accordance with prescriptions that do not impair the ability of an employee to perform their duties. The use or possession or distribution of illegal drugs

is strictly prohibited in addition possession of alcohol, firearms or other weapons is prohibited.

The consumption of alcohol may be authorised in a limited way under certain social circumstances.

12. Fair Competition

We are committed to fair and open competition. Employees must not engage in anticompetitive behaviour, collusion, or any other activities that undermine fair business practices.

Competition and anti-trust laws prohibit business practices that restrict trade. The purpose is to ensure that the markets for goods and services operate competitively and efficiently so that customers and clients may enjoy the benefit of open competition amongst their supplies and sellers, similarly benefitting from competition among their purchases. Our policy is to compete fairly in the market based on its ability to promote high-quality services at reasonable prices.

Failure to comply with competition and anti-trust laws could result in serious consequences. Violation of anti-trust laws can lead to substantial civil liability.

Examples of the type of conduct that is likely to cause a breach include:

- Allocating customers or dividing markets or marketing territory between or among suppliers, or competition placing restrictions on production or sales
- Entering into agreements that unduly limit a customer's liability to sell a product or service, including setting the price at which the customer or clients may market that product or service
- Requiring customers or clients to purchase or provide a product or service as a condition for another product or service being made available
- Conducting activity to monopolise a market or reduce competition in a market, including pricing a product or service below cost in order to eliminate or reduce competition
- Colluding or boycotting other suppliers
- Including disclosure of proprietary information by past or current employees of other companies
- Bid rigging, including cooperation amongst competitors

Verbal exchanges, regardless of when or where the communications are made, can be viewed as an agreement, therefore caution should always be exercised when meeting with competitors and discussion limited to legitimate business purposes of the meeting.

13. Protection of Company Assets

Company assets, including physical, intellectual property, and financial resources, should be used responsibly and solely for business purposes.

This includes both tangible and intangible. This includes but is not limited to intellectual property such as trade secrets, patents, trademarks, copyrights, business, marketing and service plans engineering manufacturing ideas, code, designs, database records, salary information and any unpublished financial data and reports. Unauthorised alteration, destruction, use, disclosure, or distribution of these assets violates this code.

Any such action, as well as theft, waste, or carelessness in using these assets, has a direct adverse impact on our operations and profitability and will result in disciplinary action.

No employees should make copies of, resell, or transfer externally or internally copyrighted or licenced, publications, including software manuals, articles, books, and databases been used that were created and licenced to us.

Equipment networks are systems that are provided to help employees perform their duties and support our business needs. All information transmitted by or saved from stored in equipment electronics systems or networks is the property of Jellyfish Pictures.

14. Environmental Responsibility

We strive to minimise our environmental impact and encourage sustainable practices. Employees should act responsibly in their use of resources and support of our environmental initiatives.

Climate change remains one of the world's most pressing sustainability challenge and we are committed to environmentally responsible business practices. We understand that targets help engage people and allow us to go beyond the local regulatory requirements. We track relevant environmental factors including waste management, energy consumption, water consumption and air emissions. This is outlined in our Environmental policy.

15. Anti-Money Laundering

Money laundering is defined as any act or attempted act to conceal or disguise the identity of illegally obtained proceeds so that they appear to have originated from

legitimate sources. We conduct our business in accordance with applicable anti-money laundering laws. Please contact the Ethics Committee if you have any questions regarding a specific situation or follow the whistleblowing procedure if you have any concerns.

16. Reporting Violations and committee reviews

Employees are encouraged to report any suspected violations of this Ethics Code of Conduct without fear of retaliation. Reports can be made to line managers / supervisors, the People team, or through our anonymous reporting mechanism detailed in our Whistleblowing policy.

All raised items are required to be stored for a period of 7 years.

The Ethics Committee will meet quarterly to review compliance of this code. Meeting minutes will be taken at all Ethics / significant concern meetings.

All meeting minutes are required to be stored on our Ethics confluence page for transparency purposes, however in some instances these may be redacted for confidential purposes. Full un-redacted notes will be required to be saved in a permission locked file on our central SharePoint system within the People team.

In addition, all anonymous emails reported are to be logged in the Ethics Reporting log and saved in a permission locked file on our central SharePoint system within the People team.

17. Consequences of Non-Compliance

Violations of this Ethics Code of Conduct may result in disciplinary action, up to and including termination of employment. Serious violations could result in legal repercussions.

18. Periodic Review

This Ethics Code of Conduct will be reviewed annually to maintain its relevance and effectiveness in guiding our employees' conduct.