

Electronic Communications Policy

Our employees have access to a plethora of electronic media and services, including computers, e-mail, cellphones, voice mail, fax machines, online services, and the Internet. Xscape Theatres encourages the use of these media and associated services because they can make communication more efficient and effective and act as valuable sources of information about vendors, customers, technology, and new products and services. However, all employees and everyone connected with the organization should remember that electronic media and services provided by the company are company property and their purpose is to facilitate and support company business.

All managers must sign the E-Mail Monitoring Consent Form.

This policy cannot lay down rules to cover every possible situation. It is designed to express Xscape Theatres' philosophy and set forth general principles that employees should adhere to when using electronic media and services.

The following procedures apply to all electronic media and services that are:

- Accessed on or from company premises;
- Accessed using company computer equipment or via company paid access methods; or
- Used in a manner that identifies the individual with the company.

Electronic media cannot be used for knowingly transmitting, recovering, or storing any communication that is:

- Discriminatory or harassing;
- Obscene;
- A personal solicitation;
- Derogatory or threatening; or
- For any purpose illegal or contrary to Xscape Theatres' policy or business interests.

Electronic media and services are provided by Xscape Theatres primarily for employees' business use. Limited, occasional, or incidental use of electronic media (sending or receiving) for personal, non-business purposes is understandable and acceptable. However, employees are expected to demonstrate a sense of responsibility and not abuse this privilege. Please contact the Human Resources Manager for further guidance.

Xscape Theatres, at its discretion, may review any employee's electronic files and messages to the extent necessary to ensure electronic media and services are being used in compliance with the law, this policy, and other Xscape Theatres policies. Employees should not assume electronic communications are totally private. If they have sensitive information to transmit, they should use other means.

Xscape Theatres recognizes that blogs, other types of self-published online journals, and collaborative web-based discussion forums can be highly effective tools for sharing ideas and exchanging information of all kinds. The company therefore establishes the following rules and guidelines for communicating via blogs or other communication technologies, whether used in or outside the workplace.

- Carefully review and adhere to Xscape Theatres' Social Media Policy. Employees may not post Xscape Theatres' copyrighted trademarks, logos, and other images, or make false or misleading statements about Xscape Theatres on personal or company owned/managed blogs, social media sites, or other web-based platforms. However, employees may comment in any means or format concerning their and their co-worker's specific terms and conditions of employment. In the event such communications are made, any

individual doing so must make it clear that they are not speaking on behalf of Xscape Theatres and that their comments are their own and do not necessarily reflect the view of Xscape Theatres.

- Employees may not post trademarks of any business partner, supplier, vendor, affiliate, or subsidiary on any personal blogs or other online sites.
- At no time should any Xscape Theatres employee create, maintain or use a separate customer database or mailing list. Nor should they retain any customer information collected for Xscape Theatres' loyalty program for non-authorized use.
- Employees may not record video or audio within the confines of the theatre premises or attempt to record video, audio, or still images remotely. Employees may not post on personal blogs any photographs or videos of company events or any events inside the theatre, other employees or company representatives, or company products unless employees have received explicit permission from the Marketing Department, or such comments relate to their or their co-workers' specific terms and conditions of employment. In the event such communications are made, any individual doing so must make it clear that they are not speaking on behalf of Xscape Theatres and that their comments are their own and do not necessarily reflect the view of Xscape Theatres.
- Employees may not advertise or sell company products or services via personal blogs.
- Employees may not discriminate, harass or otherwise be derogatory in any manner toward guests or co-workers.
- Employees who maintain blogs, post on film review or social media sites and who are identified or who choose to identify themselves as employees of Xscape Theatres are strongly encouraged to state explicitly, clearly, and in a prominent place on the site that views expressed are employees' own and not those of the company or of any person or organization affiliated or doing business with Xscape Theatres.
- Any employee engaged in harassing or discriminating conduct will be subject to **disciplinary action up to and including termination of employment.**

Xscape Theatres also reserves the right to use software and blog-search tools to monitor compliance with this policy.

Social Media Policy

Xscape Theatres understands that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it, certain responsibilities. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal website, social networking or affinity website, web bulletin board or a chat room, whether or not associated or affiliated with Xscape Theatres as well as any other form of electronic communication.

To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media.

- This policy applies to **all** employees who work for Xscape Theatres.
- The same principles and guidelines found in Xscape Theatres' policies apply to your activities online.

- Any conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects guests, suppliers, or people who work on behalf of Xscape Theatres or Xscape Theatres' legitimate business interests may result in **disciplinary action up to and including termination.**
- Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to **disciplinary action up to and including termination.**
- Conduct yourself in a respectful and courteous manner toward fellow employees, guests, suppliers or people who work on behalf of Xscape Theatres. If you post complaints or criticism, avoid using statements, photographs, and video or audio that reasonably could be viewed as malicious, obscene, and threatening or intimidating, that ridicule employees, guests, or suppliers; or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, gender, disability, religion or any other status protected by law or company policy.
- Do not post any information or rumors about Xscape Theatres, fellow employees, guests, suppliers, or people working on behalf of Xscape Theatres or competitors without prior approval.
- Never post internal reports, policies, procedures or other internal business-related confidential communications.
- Respect financial disclosure laws.
- Do not create a link from your blog, website or other social networking site to the Xscape Theatres website without identifying yourself as a Theatre employee.
- Express only your personal opinions. Never represent yourself as a spokesperson for Xscape Theatres. If Xscape Theatres is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of Xscape Theatres, fellow employees, guests, suppliers or people working on behalf of Xscape Theatres.
- If you do publish a blog or post online anything related to the work you do, or subjects associated with Xscape Theatres, make it clear that you are not speaking on behalf of Xscape Theatres. It is best to include a disclaimer such as — “The postings on this site are my own and do not necessarily reflect the views of Xscape Theatres.”
- Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager.
- Do not use Xscape Theatres' email addresses to register on social networks, blogs or other online tools utilized for personal use.

- Xscape Theatres prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to **disciplinary action up to and including termination.**

If you have any questions or need further guidance concerning Xscape Theatres' Social Media policy or any other policy, please contact the Human Resources Manager.

By signing this document, I confirm that I have read the full four pages and agree to the terms and conditions of Xscape Theatres' Electronic Communications and Social Media Policies.

Print Name

Signature

Date