



AMC GLOBAL MEDIA INC. SUPPLIERS ANTI-CORRUPTION POLICY

This Policy applies to all co-producers, distributors, agents, representatives, consultants, independent contractors, intermediaries, or other suppliers of services or goods (“**Suppliers**”) that AMC Global Media Inc. or its subsidiaries (the “**Company**”) engages to act for or on behalf of itself. The Policy explains the prohibitions on bribery and restrictions on making improper payments, offers, promises or authorizations of payment or anything of any value to government officials (or their agents or representatives) or to other third parties by the Suppliers to the international business of the Company.

I. OVERVIEW

The Company is committed to acting honestly and lawfully in its business dealings and relationships everywhere in the world. All of the Company's Suppliers must comply with all applicable anti-corruption and anti-bribery laws and regulations, including, without limitation, the Foreign Corrupt Practices Act of 1977 (“**FCPA**”) and the UK Bribery Act 2010 (“**UK Bribery Act**”). Both the FCPA and the UK Bribery Act prohibit transferring anything of value to government officials (or their agents or representatives) for the purpose of obtaining or retaining business for the Company or securing any improper commercial advantage. The UK Bribery Act goes a step further and prohibits offering anything of value to any person, whether or not a government official, in order to induce that person to act improperly in connection with his or her function. Additionally, most if not all countries have anti-bribery laws.

Under no circumstance may a Supplier promise, offer, authorize, give, solicit, or accept anything of value with corrupt intent when acting for the Company.

This Policy provides direction on how the Company expects its Suppliers to comply with anti-corruption and anti-bribery laws.

II. Prohibitions

a. Bribery

Bribery is the offer, promise, payment, transfer, request, agreement to receive or receipt of anything of value, whether directly or indirectly, to or from any person, in order to:

- induce that person (or any other person) to perform his roles improperly or contrary to law;
- secure an improper advantage; or
- in the case of a government official (as described below), in order to improperly influence that government official with the intention of obtaining or retaining business or a business advantage, or directing business to the Company, Suppliers, or any other person.

The bribe can be anything that the recipient views as valuable. Examples include: cash, cash equivalents, gifts, meals, travel expenses, jewelry, loans, special event tickets, kick-backs, donations, preferential treatment, investment opportunities, and favors. A thing of value also can include intangible benefits, such as inside information, stock tips, or assistance in arranging a business transaction (e.g., providing a business opportunity to a family member).

It is also bribery to offer or give a gift or entertainment when an individual knows or believes that it would be improper for the recipient to accept it. It is therefore improper to offer or give a gift or entertainment when you are aware of a policy or law prohibiting the recipient from accepting it.

Rules concerning government officials are even stricter; providing a benefit to a government official could be deemed a bribe even if your intent was not to do so. Therefore, extraordinary care needs to be taken when dealing with government officials. The same level of care is required when dealing with spouses or other immediate family members of government officials. Suppliers, and those acting on their behalf in connection with work for the Company, may not directly or indirectly offer, promise, authorize the making of, or provide anything of value to any government official to induce that government official to perform or refrain from any governmental act or make a decision to help the Company obtain or retain business.

Anti-bribery laws define "government officials" very broadly, to include individuals not typically thought of as "officials", for example:

- an employee, officer or representative of, or any person otherwise acting in an official capacity for or on behalf of a government authority (e.g., a governmental entity of a supra national, national, state, municipal, or local level; any subdivision, instrumentality, court, or agency of the same; an association or business which is owned or controlled by a governmental entity, **including state-owned or controlled companies** or a political party);
- a legislative, administrative, or judicial official, regardless of whether elected or appointed;
- an officer of, or individual who holds a position in, a political party;
- a candidate for political office;
- an individual who holds any other official, ceremonial, or other appointed or inherited position with a government or any of its agencies; or
- an officer or employee of a supra-national organization (including, without limitation, the World Bank, United Nations, IMF and OECD).

A government official would also include spouses and other immediate family members of persons falling within the definition of government official.



Because the definition of a government official is so broad, it is possible that a Supplier will interact with a government official while fulfilling its obligations to the Company. It is your responsibility to understand whether any person you are dealing with is a government official.

b. Facilitation Payments

A facilitation payment is a payment for expediting or securing routine government actions, such as obtaining permits or licenses that involve non-discretionary acts. **Regardless of their purpose, the Company never permits facilitation payments and if you are ever asked to make such a payment you must promptly report the request to your primary Company contact or the Company's Compliance Department – Legal before taking any further action.**

Facilitation payments, however, do not include official payments that are allowed by law, e.g., an approved fee to proceed through an officially designated fast-track passport control procedure.

III. BOOKS AND RECORDS

The Company expects that its Suppliers comply with the FCPA along with other anti-corruption/anti-bribery laws, which require companies to maintain accurate books, records, and accounts that reflect in reasonable detail, accurately and fairly, all transactions and dispositions to ensure that funds are not used for any improper use. It is never appropriate to mischaracterize transactions in your books and records or conceal illegal payments under the guise of legitimate payments, such as, e.g., consulting fees. All entries in the Supplier's books and records related to the Company's business, and all accounting and financial documents provided to the Supplier by the Company must be accurate and truthful.

IV. REPORTS OF VIOLATIONS AND CONTACT INFORMATION

Suppliers, and those acting on their behalf in connection with their work for the Company, are expected to raise concerns related to potential violations of this Policy. Reports can be made to the Supplier's primary point of contact at the Company, via the Company's Integrity Hotline at 1-888-217-8076 or online at <http://www.reportlineweb.com/AMCGlobalMedia> or to Anne Kelly, Executive Vice President and Corporate Secretary at (212) 324-8500 for those calling from within the United States or Canada or 001 212 324 8500 for those calling from another country. If you have any questions about this Policy, contact your primary contact at the Company or Anne Kelly.