

INTERNAL RULES

EURO DISNEY SAS/ EURO DISNEY SCA/ EURO DISNEY ASSOCIÉS SCA/ ED SPECTACLES SARL/SETEMO IMAGINEERING SARL

These Internal Rules, established in application of article L 1311-2 of the Labour Code, enacted in accordance with articles L.1321-1 and L.1321-2 of that same code, set out:

- the general and permanent rules relating to discipline,
- the measures for the application of health and safety regulations,
- the provisions relating to the right of defence as resulting from articles L 1332-1 et seq. of the Labour Code.

These Internal Rules, subject to the statutory and contractual rights inherent in the mandates of staff and union representatives, apply to all employees (the “employees”) of Euro Disney SAS, Euro Disney SCA, Euro Disney Associés SCA, ED Spectacles SARL and Setemo Imagineering SARL (hereinafter to be referred to as the “Company”), and to any person performing their employment contract within the confines of the Company, such as temporary workers and employees of external companies. The disciplinary authority for these latter persons remains at the prerogative of their respective employers.

I. TABLE OF CONTENTS

SECTION I: GENERAL AND PERMANENT RULES RELATING TO DISCIPLINE	3-8
Article 1- Working times	3
Article 2- Lateness, absence	3
Article 3- Execution of work	4
Article 4- Staff entries and exits	4
Article 5- Company property	4
Article 6- Discrimination, sexual or moral harassment	5
Article 7- Use of computer equipment and software, electronic messaging or Internet	7
Article 8- Use of social networks	8
 SECTION II: HEALTH AND SAFETY	 9-12
Article 9- Medical appointments	9
Article 10- Occupational accidents	9
Article 11- General requirements	9
Article 12- Work post training	10
Article 13- Alcoholic drinks / Drugs	10
Article 14- Smoking ban	11
Article 15- Lockers and collective equipment	11
Article 16 – Parking and vehicle traffic	11
Article 17- Evacuation – requisition	12
 SECTION III: DISCIPLINARY PROCEDURE AND RIGHT OF DEFENCE	 12

SECTION IV: PUBLICATION

ANNEX 1: PROVISIONS RELATING TO ETHICAL BEHAVIOUR NON-
PREJUDICIAL TO THE INTERESTS OF THE COMPANY 14

ANNEX 2: PROCEDURE FOR OPENING LOCKERS
AND OTHER STORAGE FACILITIES MADE AVAILABLE TO EMPLOYEES
FOR CLEANING 24

ANNEX 3: NEW CHEMICAL PRODUCT APPROVAL COMMITTEE 25

ANNEX 4: LIST OF JOBS WHICH MAY BE SUBJECT TO BLOOD
ALCOHOL TESTING BEFORE THE START OF EACH WORK SHIFT 26

SECTION I: GENERAL AND PERMANENT RULES RELATING TO DISCIPLINE

Article 1 – Working times

Employees must comply with the working times displayed at the work sites, and with any change that may be decided in accordance with the statutory, regulatory and contractual provisions.

While respecting rest days, changes to working times will be communicated to the employees.

Employees must sign in and out at the start and end of every work shift according to the scheduled work times, in accordance with the provisions of amendment 6 to the agreement of 15 April 1999 on the adaptation and reduction of working hours, with the exception of self-employed managers and executive managers in accordance with that amendment.

Employees sign in and out each working day, at the start and end of the day, in accordance with the scheduled work times.

Badge readers available across the sectors of the company record working times.

Employees should sign in on the badge reader, or list of badge readers, designated by the line manager, by inserting the badge (ID) in the machine. Employees should sign in/out in their work uniform, at the times established for the start and end of the work shift, notwithstanding the free movement of staff representatives benefitting from a special provision.

Situations of double assignments, double contracts etc. are subject to the same provisions. The start of shift sign-in corresponds to the first place of work, and the shift end sign-out takes place at the final place of work.

The use of the badge (ID) is strictly personal. Signing in for another person is strictly forbidden.

In order to ensure the correct registration of working times, any employee who does not have their badge (ID) must notify their department line manager and sign an attendance sheet.

Subject to the rights reserved for staff representatives, the presence of employees at their work post outside their work shift is prohibited.

Hours not signed in will only be paid if the employee provides proof that they actually worked.

Any sign-in/sign-out error should be immediately reported. Any breach, fraudulent sign-in or clearly established fraudulent attempt may give rise to disciplinary action, possibly even to the extent of dismissal for gross misconduct.

More particularly, employees subject to an annual fixed-days agreement, despite the freedom they have in managing the time devoted to their mission and although not subject to the legal maximum daily and weekly working hours, must respect a minimum daily rest of 11 consecutive hours and a weekly rest of 35 hours. In the event of difficulties, the employee may request a meeting with their line manager if they feel that their work load is too large, in order to analyse the reasons.

Article 2 - Lateness, absence

Employees must be at their work post, in their uniform, at the time established for the start of their work. Repeated unjustified lateness is liable for the disciplinary sanctions set out in Section III of these Rules.

Any foreseeable absence should be authorised beforehand.

Any employee unable to be at their work post must inform their manager of this at least two hours before the start of their work, and send a work absence certificate within 48 hours of the start of their absence.

Except in the case of force de majeure, any absence which breaches these rules constitutes an unauthorised absence and, as such, would be liable for disciplinary sanctions.

Article 3 – Execution of work

Employees must carry out the tasks entrusted to them correctly and in accordance with their managers' instructions and the safety instructions.

Furthermore, for safety reasons and in respect of the rights recognised on staff representatives, employees may only leave their work posts for the duly authorised breaks or if the employee has reasonable cause to believe they are in a work situation presenting a serious and imminent danger to their life and health, in accordance with articles L 4131-1 et seq. of the Labour Code. In the latter case, they should immediately inform their line manager.

Article 4 – Staff entries and exits

Employees should not leave the confines of Euro Disney¹ in "theme" costume, unless authorised by their line manager.

In the hotels, the employee entrances and exits are displayed in each of the hotels and are different to those used by customers to get to these hotels or Guests wanting to enter the Parks and the Disney Village.

Unless specifically instructed otherwise, all employees should, throughout their work, wear a badge featuring their first name provided by the Company.

Within the Euro Disney confines, they must also permanently carry their professional identity card provided by the Company, and present it to security staff at their request. The badge and card are for strictly personal use, and should be returned immediately if the employee leaves the Company.

Furthermore, on an exceptional basis and in justifiable serious circumstances, such as the disappearance of items or equipment belonging to the Company or its personnel, an inspection may be made of the lockers and other storage facilities made available to the staff, and all staff bags and vehicles. On this occasion, an employee may be assisted by any employee of their choosing, who is present at that time. The Company will ensure that this inspection is carried out in respect of human rights. Employees will be informed of their right to object to these inspections, in which case a law enforcement officer may be called.

Article 5 – Company property

The property of the Company remains the property of the Company. All employees should respect and protect them, and use them appropriately and efficiently for the sole benefit of the Company. Theft, negligence and wastage of Company property affect its business and profitability.

Employees are obliged to permanently keep the property of the Company in a good condition, as entrusted to them to carry out their work, and to immediately inform their managers of any damage or disappearance.

No item, equipment or corporate document belonging to the Company may be removed from the Company. If, on an exceptional basis and as part of their duties, an employee must remove a document or sample, they should notify their line manager beforehand and obtain their written authorisation.

The consumption of food intended for sale or consumption by Guests is forbidden for employees in charge of their sale or display, unless authorised by the line manager and with no Guests present.

Whether backstage or front of house, all employees are prohibited, on any medium whatsoever, from filming, photographing or recording the property belonging to the company or which might be associated with the company, particularly decorations, backstage areas and characters, if the photographs, films and/or recordings are intended to harm, degrade or damage the image of the Company.

The prior and written authorisation of the employee's line manager is required for the use and/or dissemination of any recordings, photographs or films of Company property.

This prior authorisation does not apply to employees whose job is to film, photograph or record. Furthermore, this authorisation does not apply to members of the establishment CHSCT (occupational health and safety committee) or

¹ The Euro Disney confines extend from the zone delimited by the site access security booths and to all the infrastructures and the ancillary buildings where the company carries out one or more activities.

central CHSCT if the photos, films or recordings are part of their occupational risk prevention missions, or to staff representatives in the exercise of their mandates. Furthermore, this prior authorisation does not apply to members of catering and accommodation committees, who might take photos as part of their missions.

The breach of this rule may be subject to disciplinary sanctions which might be as serious as dismissal.

Article 6 – Discrimination, sexual and moral harassment, sexist behaviour

- Discrimination:

No one may be excluded from a recruitment procedure or access to an in-house course or training period; no employee may be penalised, dismissed or subjected to direct or indirect discriminatory behaviour, as defined in article 1 of law no. 2008-496 of 27 May 2008 containing various adaptation provisions to community law in terms of combating discrimination, particularly in respect of remuneration, within the meaning of article L. 3221-3; no employee may be discriminated against in respect of incentive measures or share distributions, training, redeployment, assignment, qualification, classification, professional promotion, change or renewal of contract, due to their origin, gender, morals, sexual orientation, gender identity, age, family status or pregnancy, their genetic characteristics, a particular vulnerability resulting from their economic situation, apparent or known to their perpetrator, their belonging or not, actually or allegedly, to an ethnic group, a nation or an alleged race, their political opinions, their union or mutualist activities, their religious convictions, their physical appearance, their family name, their place of residence or bank domiciliation, or due to their state of health, loss of independence or disability, or their ability to express themselves in a language other than French.

- Moral harassment:

Articles L.1152-1. and L. 1152-2. of the Labour Code stipulate that no employee should suffer repeated moral harassment with the purpose or effect of degrading their working conditions and which might harm their rights and their dignity, affect their physical or mental health, or compromise their professional future.

No employee, or person in training or on a course may be penalised, dismissed or subjected to direct or indirect discriminatory behaviour, notably in respect of remuneration, training, redeployment, assignment, qualification, classification, professional promotion, change or renewal of contract, due to having suffered or having refused to suffer repeated acts of moral harassment or for having witnessed or recounted such acts.

Article L.1152-3 of the Labour Code states that any termination of employment contract contrary to the provisions of articles L. 1152-1 and L. 1152-2 of the Labour Code, and any contrary provision or act, will be null and void.

- Sexual harassment:

Articles L.1153-1 and L.1153-2 of the Labour Code state that no employee should be subjected to acts:

1° of sexual harassment, consisting of repeated words or behaviours with a sexual connotation, harming either their dignity due to their degrading or humiliating nature, or creating for the person an intimidating, hostile or offensive situation;

2° or which can be likened to sexual harassment, consisting of any form of serious pressure, whether repeated or not, carried out for the real or apparent purpose of obtaining an act of a sexual nature, whether this is sought for the benefit of the perpetrator of the acts, or for the benefit of a third party

No employee, and no one in training or on a course, no candidate for recruitment, or in-company course or training period, may be penalised, dismissed or be subjected to direct or indirect discriminatory behaviour, notably in respect of remuneration, training, redeployment, assignment, qualification, classification, professional promotion, change or renewal of contract, for having suffered or having refused to suffer acts of sexual harassment as defined in article L.1153-1 of the Labour Code, including the cases mentioned in 1° of that same article, whether the words or behaviours are repeated or not.

Similarly, article L.1153-3 of the Labour Code states that no employee, and no one in training or on a course may be penalised, dismissed or be subjected to discriminatory behaviour for having witnessed acts **and** actions of sexual harassment or for having recounted such acts and actions.

Article L. 1153-4 of the Labour Code states that any provision or act contrary to the provisions of articles L.1153-1 to L.1153-3 of the Labour Code is null and void.

Articles L.1152-5 and L.1153-6 of the Labour Code state that any employee who has carried out acts of moral or sexual harassment is liable for disciplinary sanctions. Consequently, any Company employee proven to have carried out such acts will be liable for the penalties set down in Section III of these Rules.

- Sexist behaviour:

Article L1142-2-1 of the Labour Code states that no one should be subjected to sexist behaviour, defined as any action linked to the gender of a person, with the aim or effect of harming their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

This therefore relates to any intimidating or offensive behaviour against persons of the opposite sex, whether this constitutes inappropriate comments, gestures or attitudes. For example, sexist behaviour may take the form of expressions and behaviours ranging from the seemingly innocuous (sexual pleasantries and comments, negative stereotypes etc.) to the most serious behaviour (disrespectful labels/actions, practices of exclusion, discrimination etc.).

Any Company employee proven to have carried out such actions will be subject to the penalties set out in Section III of these Rules.

Any employee believing they are a victim of moral or sexual harassment, discrimination or sexist behaviour may, directly or through a staff representative, refer the matter to their employer, represented by a human resources officer. They may also refer the matter to the head of the establishment, who will be assisted in the procedure by a human resources officer. They may also refer the matter to their line manager. The occupational physician is also competent in this respect.

It falls to the employer to adopt all the necessary measures to prevent acts of moral or sexual harassment, discrimination or sexist behaviours. The employer must therefore notably, and at the earliest opportunity, verify whether a prevention measure or an inquiry respecting adversarial principles and rights of defence is established, with the collaboration of the staff representative if the employee has requested such a representative. At the employee's request, the human resources officer must ensure the confidentiality of the information communicated to them in order to avoid any reprisals.

This procedure applies with the exception of the exercise of the right to notify set down in article L 2313-2 by a staff delegate, if the physical and mental health of the employee is harmed, or by the CHSCT in the event of serious and imminent danger in accordance with article L.4131-2 of the Labour Code.

Article 7 – Use of computer equipment and software, electronic messaging and Internet

New information and communication technologies (use of electronic messaging, laptops, mobile telephones and smartphones etc.) are today an integral part of the work environment and necessary for the Company to function.

However, the use of these technologies must respect the quality of work life and the personal balance of each employee.

Thus, notwithstanding any details included in the negotiation of quality of work life, it should be remembered that each employee, regardless of their hierarchical level, has the right to disconnect outside their working hours. . The provisions of article 1 of these Rules will apply to executives coming under an annual fixed days agreement. Consequently, except in exceptional cases which should remain rare, which are justified by the gravity, urgency and importance of the subject concerned, and which might have repercussions on the safety, image and financial situation of the Company, each employee should endeavour to disconnect from digital tools (e-mail, mobile telephones etc.), outside of working times and days (rest days: weekends, public holidays, various leaves and any period of suspension of the employment contract). During these periods, employees should limit sending e-mails or making phone calls to what is strictly necessary. They will be under no obligation to read and respond to e-mails and phone calls addressed to them during this period.

These instructions will be reminded to all line managers to raise awareness of the respect of this right to disconnect.

All employees are obliged to keep in good condition the computer equipment, software and means of electronic communication (including the Internet) made available to them to carry out their work, and to use the means (passwords) to safeguard the personal and professional use of the equipment entrusted. All employees are obliged to keep their password personal, and to not divulge or transmit it to anyone else unless requested in writing by their line manager.

If particular circumstances so require, notably if the department manager is faced with the imperative need to access the files of an employee in the latter's absence, in order to ensure the continuity and functioning of the department and possibly an IT maintenance operation, the department manager will have the right to access the folders, files and e-mails of the employee, provided these are of a professional nature.

In this context, the folders, files and e-mails created by the employee for the execution of their work are presumed to be professional in nature, unless the employee has identified them as personal folders, files or e-mails and has named them as such. The department manager may therefore access professional files and folders, and professional e-mails, without the presence of the employee. Access to the files, folders and e-mails identified as personal may only take place in the presence of the employee.

The professional nature of the file, folder or e-mail which the department manager might access will be identified by the title and description of the file or folder, the subject line of the e-mail and, where relevant for e-mails, the sender or recipient of the e-mail. It might also be identified by the filing system devised by the employee.

Unless authorised beforehand in writing, employees must not use the equipment, software and means of electronic communication (including the Internet) for non-professional purposes. As an illustrative example, employees are strictly prohibited from using electronic messaging (including the Internet) for correspondence without a direct connection with the employee's professional activity in the Company.

The reception of non-professional correspondence will not be considered wrongful if the employee concerned, as soon as they have knowledge thereof, proceeds to its destruction at the earliest opportunity. Voluntary subscription to a circulation list with no connection with their professional activity, however, is prohibited.

Employees are also reminded that if they are entrusted with IT resources and mobile telephones as part of their functions, paragraph 3 of article 5 of these Rules will not apply.

In accordance with the statutory and regulatory provisions, employees are also prohibited from copying computer software, using pirate software and, more generally, bringing into the Company or downloading by Internet any software which is not covered by a licence agreement. The Company reserves the right to destroy software used in violation of these provisions.

In order to guarantee the observance of these provisions, the Company reserves the right, by any means, to carry out any inspection it considers appropriate and, where appropriate, to destroy any document, regardless of the medium, which does not have a professional purpose, in accordance with the rules governing the secrecy of personal correspondence.

On an exceptional basis, if an employee is in possession of data whose dissemination has been stipulated as confidential by a written instruction, and if reliable and consistent evidence exists of a violation of this confidentiality, the controller may open the files and electronic messages found on the computer in order to determine this possible violation.

The inspection will be carried out by any person named by the Company on account of their competency. The inspection will be carried out in the presence of the employee concerned.

During the inspection, the line manager of the employee concerned (or the competent manager in the absence of the line manager) may be present. The employee may request the presence of a staff representative or another employee.

Each employee concerned may anticipate this inspection and inform their line managers of any anomaly they may have reason to report concerning the use of their electronic messaging, Internet, the e-mails they receive or the software used.

In terms of open-access equipment which is not personally assigned to an employee, an inspection may be carried out at any time if the content of the information saved cannot be attributed to one holder in particular.

With the exception of portable devices made available to employees, no computer equipment or software belonging to the Company may be removed from the Company without its prior, written authorisation.

Any employee violating the provisions of this article, and whose responsibility is clearly established, is liable for the disciplinary sanctions set down in Section III of these Rules.

These provisions apply during and outside working times, if the employee is still present on the site of Disneyland Paris.

Upon their permanent departure from the Company, employees are obliged to return in good condition the computer equipment, software and documents entrusted to them in order to carry out their work.

Article 8 – Use of social networks

All employees benefit from freedom of expression on social networks provided they don't misuse them. Furthermore, any employee commenting about the Company on social networks or similar (notably account, blog, personal profile such as Facebook, Workplace etc.) must not do so abusively. They are bound by an obligation of loyalty associated with their employment contract. They must also obey the law. As such, they may not directly or indirectly make injurious, derogatory, defamatory and racist comments about the Company or its customers and suppliers. The same applies to their work colleagues when this creates a characterised objective disturbance within the Company. Lastly, they must ensure that no damage is caused to the image of those persons.

These provisions do not apply to private correspondence unless the consequence of such correspondence is to create a characterised objective disturbance within the Company, causing damage to the latter.

As such, and provided the employee is identified with certainty, any behaviour or comment in breach of these provisions might be sanctioned.

Furthermore, these same injurious, derogatory, defamatory and racist behaviours displayed within the Company itself will be subject to disciplinary sanctions.

SECTION II: HEALTH AND SAFETY

Article 9 – Medical appointments

All employees must attend the statutory and additional appointments requested by the occupational physician, particularly for roles recognised as having potential risks.

The breach of this obligation is liable for disciplinary sanctions.

Article 10 – Occupational accidents

Any occupational accident must be immediately notified to management in order to establish the relevant declarations.

Article 11 – General requirements

Employees are obliged to observe the statutory, regulatory and contractual requirements on health and safety set down in these Internal Rules and the particular instructions brought to their knowledge, notably by way of department memos.

Article L 4122-1 of the Labour Code states that it falls to each employee, based on their training and to the extent possible, to be responsible for their health and safety and the health and safety of the other persons affected by their acts or omissions at work.

First and foremost, the Company and its representatives must provide employees with collective or personal protective equipment appropriate to their work posts.

Furthermore, all members of staff are obliged to use the collective or personal protective equipment provided, as well as any protection or detection system. Any removal or disablement of a protection or detection device protecting the staff might constitute a case of misconduct.

This does not apply to removal or disablement within the context of a maintenance procedure of such devices.

The following must be rigorously observed:

- the instructions relating to the work post;
- the safety instructions relating to people traffic and motor vehicle traffic both on and off the site;
- the obligation (see article 5 above) for all staff to keep in good condition and ensure the general maintenance of the machines, vehicles, tools and generally all materials or equipment entrusted to them to carry out their work. Management must be immediately notified of any defect or disappearance;
- the use of the stipulated personal or collective equipment and clothing;
- the prohibitions and obligations stated on the boards displayed in the establishment;
- the operation of any machine / equipment: only persons who have been trained and have a valid operating licence are authorised to operate the machines and equipment belonging to the Company and are obliged to use them in the way for which they were designed;
- Machine/equipment operators must respect the traffic plan established in the Company.
- the driving of Company vehicles: the obligations of any person attached to the Company authorised by their management to drive vehicles are as follows:
 - hold a valid driving licence recognised on the French territory. Furthermore, any driver must have more than 2 years of experience and be older than 20 years of age;
 - inform their line manager of any removal, suspension or cancellation of their driving licence
 - observe the provisions of the Highway Code
 - carry out the usual checks before using the vehicle (check the tyres, lights, indicators, regularly check fluid levels etc.)

- inform management of any mechanical fault or anomaly in the operation of the vehicle
- return the vehicle clean and tidy

To prevent occupational accidents, personnel are obliged to follow the safety instructions displayed in the work premises.

Furthermore, each employee has a right of withdrawal in application of the provisions of article L.4131-1 of the Labour Code.

In accordance with article L.4132-5 of the Labour Code, in the event of serious and imminent danger, management will take the action and give the instructions necessary to enable staff to stop their work and get to safety by immediately leaving the place of work; every employee is obliged follow these instructions.

Article 12 – Work post training

Article L 4141-2 of the Labour Code highlights the obligation to receive safety training for any new employee, any change of work post or technique, or at the request of the occupational physician. All *employees* must confirm this by signing off the training received.

It falls to management to ensure and complete information and the training of the employees acting under their orders as regards the safety instructions applicable to accomplishing the work they carry out, and to verify the observance of these instructions.

Employees are obliged to attend the training decided by their line managers relating to protection and prevention and, generally speaking, all training required for them to carry out their jobs.

Article 13 – Alcoholic drinks/drugs

Bringing in, distributing and consuming alcoholic drinks in the work place is prohibited under the conditions set out in articles R 4228-20 and R 4228-21 of the Labour Code. The same applies for drugs and hallucinogenic substances whose use, transfer, consumption or possession is prohibited by law. The breach of these provisions might be subject to disciplinary sanctions which might be as serious as dismissal.

Furthermore, in order not to affect the quality of the shows put on for the Guests and in view of the safety imperatives governing Euro Disney's business, employees must, at all times at work, ensure their capacities are not reduced by the effects of alcohol, drugs or any other substance whose consumption is prohibited or not issued by medical prescription.

A breathalyser will be provided to employees disputing their state of alcoholic intoxication in order to remove any doubt on their state of apparent inebriation. If the results prove that the employee tested is under the influence of alcohol, they may request an immediate re-test using another breathalyser in the presence of a witness. If the employee asks not to take the tests, a law enforcement officer may be called.

Similarly, following the series of tests with the breathalyser and for behaviour which might point to being altered by the consumption of drugs or hallucinogenic substances, the employee might be invited to go to the sickbay to ascertain whether they are capable of being at their work post without posing a risk to their health and the safety of persons on the site.

Employees are informed that they have the right, if they wish, to be accompanied by a person of their choosing, who must be an employee of the Company.

By way of an exception, if a job involves stunts or stringent requirements in terms of safety, vigilance and behavioural control (jobs listed in annex 4), and in order to prevent serious risks associated with these jobs, the employees in question must ensure, at all times during their work, that their capacities and reflexes are unaltered by any psychoactive substance. Employees are reminded that the occupational physician is available to employees taking medications to evaluate the compatibility of taking this medication with carrying out their job in complete safety.

As such, for jobs involving stunts, employees' blood alcohol levels will be systematically tested for each show/performance. This test will be by means of a breathalyser before the start of their shift.

For these jobs, and for those involving stringent requirements in terms of safety, vigilance and behavioural control, listed in annex 4, blood alcohol tests or drug consumption detection tests may be carried out before the start of each shift, by means of a breathalyser or saliva test for the detection of narcotic substances, in order to prevent any risks linked to alcohol or drug consumption.

Employees undergoing a saliva test for the detection of narcotic substances may request a medical counter-assessment.

Furthermore, the medical department will ensure the specific medical supervision of the employees concerned, during which the particular conditions of aptitude necessary for such jobs will be checked; the consumption of psychoactive substances is incompatible with the performance of risk-free stunts. The same applies for employees with jobs involving stringent requirements in terms of safety, vigilance and behavioural control, listed in annex 4, and for which the medical department carries out specific supervision. The medical department might carry out the relevant substance tests at any time if it considers this necessary.

Article 14 – Smoking ban

In accordance with the legislative and regulatory provisions in force, all employees *are* prohibited from smoking in enclosed and covered areas accessible to all employees (such as refectories, training rooms, meeting rooms, cloakrooms etc.), in enclosed and open work places where work is carried out (stage, stunt show, park etc.) and in all group and individual offices.

This same ban applies in company vehicles.

Under the same conditions, this ban extends to the use of electronic cigarettes (“vaping”).

The breach of this ban may result in disciplinary sanctions, which might be as serious as dismissal for repeated offences.

Article 15 – Lockers and collective equipment

The individual lockers provided to each employee for clothes, and the collective equipment provided to all employees, must be kept completely clean.

In order to ensure the cleanliness of the lockers and protect personal property during cleaning, a locker opening procedure for cleaning has been established and is annexed to these Internal Rules.

Article 16 – Parking and vehicle traffic

Employees are only authorised to park their vehicles in the places made available to them (staying free of fire lanes, disabled spaces, hazardous zones etc.) and must park in the zone(s) assigned to them by the identification department.

These spaces must not be occupied outside working days and times.

Any vehicles driven within the confines of the Company must obey the Highway Code, particularly the maximum permissible speed displayed on the signs.

Random checks might be carried out by the Safety, Prevention and Rescue services, using an approved radar (fully automatic EUROLASER laser speed meter controlled annually by an official control body which calibrates it if necessary).

Any identified breach of the provisions above might be subject to disciplinary sanctions, as set down in Section III of these Rules. In all cases, management also reserves the right to suspend the use of the sticker normally given to company employees to allow them to park their vehicles on the site for a certain period of time.

Article 17 – Evacuation – requisition

Employees are obliged to follow the instructions displayed in the work places in the event of fire, notably in terms of the obligation to notify, the organisation of first aid and the staff evacuation procedures. Management should remind staff of the location of the information display sites.

Furthermore, staff must familiarise themselves with the instructions displayed relating to the implementation of the notification and fire prevention systems.

In the event of danger, particularly fire, the establishment personnel will be evacuated following the evacuation plan and fire instructions displayed for such eventuality.

In accordance with article L.1321-1, paragraph 2 of the Labour Code, and if the working conditions protecting the health and safety of employees appear compromised, management may be required to call upon company personnel to help re-establish such working conditions, accounting for the skills and training of each person.

The failure of employees to follow the health and safety instructions given to them, or the measures set down in these Rules, constitutes misconduct liable for disciplinary sanctions which might be as serious as dismissal.

SECTION III: DISCIPLINARY PROCEDURE AND RIGHT OF DEFENCE

In accordance with article L 1332-1 of the Labour Code, no penalty may be imposed on an employee unless the latter has been informed at the same time, and in writing, of the grievances raised against them.

If the employer envisages imposing a penalty, it must invite the employee to a prior meeting in writing, indicating the purpose of the meeting. In application of article L 1332-2 of the Labour Code, this prior meeting is not mandatory if the penalty envisaged is a warning.

During the meeting, the employee may be accompanied by a person of their choosing who must be a Company employee; the employer will indicate the grounds and reasons for the penalty envisaged and hear the explanations of the employee. The penalty may not be imposed less than one clear day or more than one month after the scheduled meeting date. It must be well-founded and notified to the interested party.

If the actions of the employee mean immediate suspension on precautionary grounds is essential, no definitive penalty relating to their actions may be imposed without the procedure described above being observed.

Any action considered wrongful may, depending on its seriousness, be subject to one or other of the penalties listed below in order of importance.

- written warning,
- reprimand or disciplinary suspension of 1 to 3 consecutive or non-consecutive days,
- dismissal on real and serious grounds,
- dismissal for serious misconduct
- dismissal for gross misconduct.

The employee may also be given a verbal warning, however this does not constitute a penalty within the meaning of article L 1331-1 of the Labour Code.

The penalty imposed will be based on the severity of the facts, accounting for mitigating or aggravating circumstances relating to the character of the employee committing the fault, their hierarchical level and their career in particular, noting that any breach of the provisions of the Internal Rules and its annexes might be subject to disciplinary sanctions imposed in accordance with this Section

SECTION IV: PUBLICATION

These Internal Rules have been submitted for the opinion of the Workers' Committee on 12 September 2017 and the Central CHSCT on 25 August 2017. Two copies were filed with the Marne la Vallée Labour Inspectorate and one copy with the Registrar of the Labour Court on 16 October 2017.

Displayed by no later than 1 December 2017, these Internal Rules will take effect on 1 January 2018.

Executed at Chessy on 16 October 2017.

Karine RAYNAUD
Director, Labor Relations, Diversity and Inclusion

ANNEX 1

PROVISIONS RELATING TO ETHICAL BEHAVIOUR NON-PREJUDICIAL TO THE INTERESTS OF THE COMPANY

This annex sets out the rules of professional conduct or ethics (the “Code”) applicable to all Company employees, and more specifically as required by the functions they perform within the Company, and for which they have received the appropriate training.

In the event of any doubt or question about the application of the provisions of the Code, employees may meet with their line manager, their Human Resources manager or, where applicable, contact the persons authorised to receive and/or handle informer reports in application of the internal procedures.

I. PROFESSIONAL ETHICAL VALUES

A. Responsibility to the Company and its shareholders

The activity and reputation of the Company must be permanently protected so that the Company can continue to meet the expectations of its Guests, customers, employees and shareholders. Honest and ethical behaviour in carrying out the business of the Company contributes significantly to achieving these objectives. Another objective is to provide a reasonable return on investment to the shareholders of the Company and to increase the value of their investment.

a) Conflicts of interest

The Company’s business is founded on the confidence of Guests and customers in the products and services it offers. It is therefore important to base this on the efforts of every employee. Employees must therefore avoid conflicts of interest when carrying out their duties. Such conflicts of interest could damage the company’s reputation.

A conflict of interest exists when the private interest of an individual or their immediate family² interferes in one way or other with the interests of the Company. A conflict of interest may also arise when an employee, or a member of their immediate family, receives personal benefits simply because of their position in the Company.

Below are examples of conflicts of interest.

An employee must not, without the authorisation of the Company, enter into business relations on behalf of the Company with members of their immediate family or companies in which they have an interest, notably financial, either through the employee themselves or through their immediate family. Similarly, the line manager of an employee may not, without the consent of the Company, authorise the latter to enter into such business relations with members of the immediate family of this manager or with companies associated with them. This rule also applies to employees who, due to their role, have the power to influence the business relations of the Company with other companies; employees may not, without the Company’s consent, use their authority to seek to influence the Company so that the latter prioritises a company in which they or a member of their immediate family have a financial interest.

Employees in a position which might influence the Company’s business relations with a company, or which seeks to enter into business relations with the Company, must declare to the Internal Audit Director or the Legal Department

² For the purposes of this Section, the following definitions apply:

“Immediate family members” refer to spouses, parents, children, siblings, fathers-in-law and mothers-in-law, sons-in-law and daughters-in-law, brothers-in-law and sisters-in-law, and the persons (other than domestic staff) who reside permanently at the person’s residence. “Financial interest” refers to any remunerated activity or agreement (e.g. as agent, representative, employee, promoter, consultant or inventor) relating to a commercial enterprise, or any interest (shareholding, partner status etc.) of more than 5% in a listed company or, for an unlisted company, of a commercial value of more than EUR 20,000 or the equivalent thereof, unless it can be proven that this interest is manifestly insignificant.

“Line manager” refers to a manager.

any direct or indirect financial interest which they themselves or any member of their immediate family might have or might have just acquired in these companies.

It is also incumbent upon the line manager of an employee they indirectly supervise to inform the Internal Audit Director or the Legal Department if this employee is or plans to enter into business relations on behalf of the Company with a member of the immediate family of their immediate line manager, or with a company in which this immediate line manager or a member of their immediate family has a direct or indirect financial interest.

For the duration of their work within the Company and subject to the applicable regulations, no employee, without the Company's consent, may carry out an independent profession or be employed by a third party if this might interfere, in one way or other, with the exercise of their job within the Company. Similarly, no employee working full-time may carry out competing activities to those of the Company or even provide services to a competitor of the Company, or acquire a direct or indirect financial interest in such company.

Furthermore, a conflict of interest may notably exist if an employee misuses an advantage given by the Company for the purpose of carrying out activities which might compete with the activities of the Company, contravening the obligation of loyalty inherent in the employment contract binding any employee.

Any employee with questions about a possible conflict of interest is invited to contact the Internal Audit Director or the Legal Department.

b) Use and disclosure of confidential information, opportunities and assets of the Company

Employees must only use the confidential information about the Company for the purposes of carrying out their duties and not for personal ends. Certain third parties might easily profit from such information and endeavour to procure it by any means. Each employee must therefore preserve the confidentiality of the information entrusted to them by the Company. Employees must not use confidential information about the Company for the profit of other persons, notably vis-à-vis the press. Furthermore, unless specifically authorised by management, no employee should disclose confidential information about the Company to a third party. Within the context of fulfilling their mandate, staff representatives have an obligation of discretion in respect of information considered confidential by law or defined as such by the employer.

Confidential information about the Company essentially includes confidential or non-public information relating to:

- significant property transaction projects;
- employees (particularly marital status and remuneration), without prejudice to the rights of the staff representative institutions;
- sales and results of the Company until they are officially announced by the latter,
- planned mergers, acquisitions or asset disposals, and discussions with the Company's creditors;
- strategic business plans;
- significant contracts;
- litigious or pre-litigious disputes; and
- any projects developed or envisaged by the Company, their costs and other business secrets etc.

If there is any doubt about the confidentiality or non-confidentiality of information both in and outside the Company, it falls to the employee to consult their line manager or the Legal Department to clarify the situation before sharing this information.

Opportunities which might arise on the occasion of using property or information about the Company or due to the role carried out within the Company must not be used for personal ends.

The property of the Company remains the property of the Company. All employees must respect and protect this property and ensure it is used appropriately and efficiently for the sole benefit of the Company, in accordance with its Internal Rules. Theft, negligence and wastage of the Company's property affect its business and its profitability.

c) Intellectual property

Where appropriate, the Company protects its information and elements of intellectual property by means of registered trademarks, patents and copyrights. Similarly, the Company expects its employees to respect the copyrights, registered trademarks, patents and other third-party protected information. Notably likely to benefit from intellectual property protection are creative works on written, audio or visual media, and software.

Furthermore, ideas might come from internal interaction between employees. These ideas might notably include creative suggestions, plans and sketches, illustrations, attraction concepts for theme parks, game suggestions, manuscripts, treatments, scripts and songs, in any form whatsoever. Employees must clearly reject any unsolicited ideas submitted by sources outside the Company, in accordance with the Company's rules and policies on such

matters. Generally speaking, in order to avoid any possible confusion with original ideas from employees or ideas developed by the Company, any employee receiving an unsolicited idea from outside the Company must not read, hear and familiarise themselves with this unsolicited idea, and should immediately transmit the corresponding media to the Legal Department, without keeping a log or writing a report on it, or transmitting it to other employees. Observing these rules protects the Company against unjustified claims of third parties concerning ideas or creations originating from the Company and its employees. Lastly, in order to prevent any claims on the use by the Company of information belonging to a third party, whether protected or not, employees should seek the advice of the Legal Department before taking part in a meeting or conversation with a third party person or entity, during which the sharing of such information is envisaged, so that an appropriate confidentiality agreement governing this situation may be implemented beforehand.

d) Accuracy of information

Employees should demonstrate accuracy and honesty in saving and holding the information to which they have access, and in the manner by which they complete Company documents. This obligation applies, for example, to expense notes, invoices, pay-related documents, safety reports, activity reports and even appraisal-meeting forms.

B. Responsibilities vis-à-vis other companies

a) Acceptance of gifts

While recognising that gifts can be part of the normal course of business in a certain number of situations, their acceptance must comply with the following rules, intended notably to ensure the uniformity and transparency of the relevant practices in the Company.

- *"Gift"* refers to any item of value, which might take the form of tangible assets – such as jewellery and objects of art – or intangible assets or benefits – such as services, discounts, particular privileges, advantages, benefits, entitlements which cannot be claimed by the general public, holidays, trips, use of holiday accommodation, free entry to sporting or special events, rounds of golf, training trips to suppliers, or even loans or other advantages.
- *Gifts which "can be part of the normal course of business"* refers to any gift which, first, by its nature is considered part of common practice, notably with regard to the position, responsibilities and seniority of the recipient of the gift given and, second, whose acceptance might benefit the Company by fostering business relations with the giver. For example, a tangible asset will almost never be considered "part of the normal course of business", while certain intangible advantages, such as entry to a sporting event or even an invitation to play golf, might be.

The general rule is, unless obtaining the prior consent of their manager, employees should abstain from accepting from any person or company with which the Company has business relations, any person or company seeking to enter into business relations with the Company or any person or company which is a competitor of the Company, **more than one gift per calendar year,³ up to a commercial value per gift of 60 euros⁴ (as estimated in good faith by the employees themselves).**

- If the value of a gift exceeds 60 euros: it falls to the recipient to determine in good faith, on a case-by-case basis, whether the gift can be considered part of the normal course of business. If this is the case, the recipient may accept and keep the gift without needing to refer the matter to the Internal Audit Director, within the limits of a total commercial value of 400 euros for all gifts received by the employee over the calendar year. In the opposite case, the employee is required to refrain from accepting the gift. Restaurant invitations, if these are part of the normal course of business, are not subject to the limit of 400 euros.
- If, over a calendar year, an employee receives one or more gifts as part of the normal course of business, but whose total commercial value exceeds or might exceed 400 euros: the employee may then choose to refuse or accept the one or more gifts exceeding this value. If they decide to accept them, they must notify the Internal Audit Director within a period of 15 days so that the latter can assess whether the gifts concerned are part of the normal course of business. If they are, the recipient may keep the gifts without restrictions. If they are not, they then have the choice of donating to a charitable cause through the Company, or pay the Company an amount equivalent to the commercial value of the one or more gifts concerned exceeding the limit of 400 euros.

³ The calendar year is 1 January to 31 December each year.

⁴ Any limit which the Company might set from time to time will be communicated to its employees.

Under no circumstance may a gift in the form of cash or transferable securities be accepted (other than in very exceptional circumstances, such as a marriage, in which the case the limit of 60 euros will apply).

If may also prove to be sensitive or even inappropriate in certain circumstances to refuse or return a gift given out of pure generosity but which is not part of the normal course of business. Various alternative solutions then exist for this type of situation. The employee has the option to: 1) return the gift with a letter of thanks, indicating that the rules of the Company do not authorise them to accept the gift; 2) keep the gift and give it to the Company to be sent to a charitable organisation or used another way; or 3) keep the gift and make a charitable donation through the Company of an amount equivalent to the commercial value of the gift exceeding 60 euros (for options 2 and 3, or if none of the options proposed seems appropriate in view of the specific circumstances, employees are invited to contact the Internal Audit Director).

In all cases, the rules set down in this article clearly do not intend to prohibit or regulate courtesy gifts offered by someone having personal relations with the recipient, independently of any business relations which exist or which might exist with the Company.

b) Business relations with financial institutions

Any employees playing a significant part in the decisions concerning initiating or managing business relations between the Company and a financial institution must avoid personal transactions with this institution, or benefitting from an advantage or opportunity originating from this institution (or any intermediary acting for the institution), if this transaction, advantage or opportunity is not accessible to the other clients of the institution having business relations of the same nature with the institution (e.g. for asset management or acquisition of a mortgage). For example, if a financial institution provides an opportunity to subscribe in advance to a public offering on the capital of a listed company, this may represent an immediate and very specific advantage for the recipient, and should therefore be considered with the greatest precaution. If a similar option to participate in the offering is not given in general to the other clients of the institution, the employee concerned should then refrain from participating.

An identical rule applies in cases where these same transactions, advantages or opportunities are offered to a member of the immediate family⁵ of an employee, or a company or organisation in which the employee or a member of their immediate family has a financial interest.

c) Invitations to tender, single-source procurement and negotiated tenders

Employees in charge of making purchases on behalf of the Company must proceed to invitations to tender in order to determine the value of the products or services concerned on the market, and to ensure the optimum price, quality and service ratio at all times. Occasionally, due to the particular nature of certain products or services, it might be that there is only one available procurement source. In such cases, negotiations with the supplier of the products or services concerned should be carried out to ensure a fair and reasonable price, given the necessary quality requirements and the delivery deadlines imposed.

d) Purchases from small businesses

Small businesses should have the opportunity of doing business with the Company. The small businesses should be evaluated faithfully and based on their qualifications. Furthermore, employees must be mindful of working with suppliers reflecting the same diversity as that sought by the Company.

e) Multiple-level relations

In the course of business, employees may need to deal with companies or individuals which have relations at different levels with the Company. Concomitant relations may exist with companies as both customers, suppliers, competitors, licence holders, distributors or partners. While an employee should generally only manage one level of relations at a time, each employee should be aware of the possible existence of relations at different levels, and avoid any potential conflict. Employees should also deal with the employees of the other business in accordance with the Internal Rules of the Company established for each level of relations concerned. If the case arises, it is particularly important to know whether a business with which the employee is dealing is also a competitor so as to avoid all discussion on pricing policy, general terms and conditions, costs, business plans and, generally, any non-public information about the Company and this competitor.

⁵ See the definitions in article A.a) “Conflicts of interest” for the terms “*immediate family members*” and “*financial interest*”.

C. Responsibilities vis-à-vis authorities

a) Gifts given to third parties

For the purposes of this paragraph, a “gift” is any item of value. This includes, but is not limited to, toys, DVDs, entry tickets, cash and intangible items such as discounts, services, loans, favours, privileges, advantages, benefits, entitlements not available to the general public, holidays, trips, holiday accommodation, sporting or musical events, golf invitations, events or the use of facilities for recreational purposes.

In our Company, the most common gifts are:

- Entry to the parks,
- Meals and drinks,
- Hotel rooms, convention centres,
- Entry to the shows,
- Toys,
- Price discounts for the above if not available to the general public.

While recognising that the giving of gifts can be part of the normal course of business in a certain number of situations, the gifts given by the Company to third parties must respect the rules intended notably to ensure uniformity and transparency of the relevant practices within the Company, and to protect it from possible libel action.

The general rule is, unless they have received the prior agreement of their director-level senior and Vice-President, employees should refrain from giving gifts to third parties. Even in these cases, professionalism is obviously *de rigueur*: employees are prohibited from giving gifts in exchange for an illegitimate favourable action by the recipient.

In all cases, these rules clearly do not intend to prohibit or regulate courtesy gifts offered by an employee having personal relations with the recipient, independently of any business relations which exist or which may exist with the Company. Nevertheless, these gifts are given at the sole personal responsibility of the employee in question, and cannot in any event commit the Company.

If gifts are given to officials, additional stricter rules will apply as specified below. For the purposes of this paragraph, “Official”, in the broadest sense, refers to any person with public authority, tasked with a public service mission or elected to public office in France or in a foreign country or part of a public international organisation. Any person with the status above as well as their spouse and children will be considered an Official within the meaning of this paragraph.

This status includes, but is not limited to:

- Employees of French or foreign authorities;
- Employees of international organisations;
- Employees of companies controlled or owned by the State;
- Employees of prefectures or councils;
- Employees of independent administrative authorities such as the AMF (French Financial Markets Authority), the CSA (French Audiovisual Council) or the CNIL (French Data Protection Authority);
- Officers of the police and gendarmerie.

The Company and the Company’s employees may be called upon to work with Officials within the scope of the Company’s business, in the context, for example, of a sanitary inspection of one of our restaurants or a safety inspection of a new attraction. The employees responsible for these cases must be completely informed about the laws and regulations applicable to business relations with Officials, and must respect them at all times. These employees should be aware of the fact that practices considered acceptable in a commercial environment (e.g. meals, transport or entertainment) may not be in a context of business relations with Officials.

Employees must follow the Internal Rules of the Company in their relations with Officials, and consult the Legal Department for any special situations. The sensitivity of relations with Officials requires greater monitoring by the Company, which could see its reputation tarnished or be fined heavily for illegitimate gifts.

If an employee wants to give a gift to an Official, they must first of all assess, in good faith, whether the gift is being given without illegitimate expectation of something in return from the Official.

If this is the case, they may submit their request, after obtaining the agreement of their manager, to the Director level and Vice-President as follows:

- Assess, in good faith, the status of the person receiving the gift to determine whether the person does indeed fall into the category of Official. If this is the case, determine whether the Official is a potential conflict of interest with the Company and whether they are entitled, based on their own rules of ethics, to accept the gift,
- Determine the value of the gift and check that the Official in question has not already received gifts of a total commercial value of more than 150 euros with the Finance Department,
- Complete the questionnaire on the reasons for giving a gift to an Official and obtain the written approvals set out in the questionnaire.

No gift may be given to third party Officials until all the stages above have been satisfactorily completed.

b) Local authorities

Good relations with the local authorities within which the Company carries out its business are essential. It falls to the employees in contact with the representatives of these authorities as part of their job to promote and preserve these good relations, within the context of the application of the convention for the creation and operation of the Euro Disneyland project of 24 March 1987. Employees are reminded that they have the necessary assistance from dedicated specialist services.

Employees are reminded that they have the necessary assistance from dedicated specialist services.

II. LEGAL RULES

Independently of professional ethical values, the law imposes precise and specific obligations which each person must respect.

This section aims to summarise a certain number of applicable legal obligations. This presentation is not exhaustive, and a certain number of other legislative or regulatory obligations apply or may apply to certain employees.

A. Competition law

French and community competition law and, all other legal provisions of the same nature in force in other jurisdictions in which the Company carries out its business, must be respected. For example, France and other European countries, as well as many other countries, have adopted legal provisions on merger control and competition which, depending on the circumstances, apply to the business of the Company.

The Company must compete fairly on each of the markets on which it carries out its business.

Competition law is a legal framework which aims to establish fair competition. Employees should understand this legal framework to the extent necessary to carry out their work, and act in all circumstances in respect of this law. Otherwise, the Company and the one or more employees responsible could face prison sentences and heavy fines, and may be held civilly liable. If they are faced with a question about the application of competition law to any particular case, or about the compliance of our commercial practices with the applicable law, employees have the right, duty and responsibility to refer the matter to the Legal Department.

Competition law prohibits certain agreements aimed at restricting competition.

This prohibition notably relates to any agreements, conventions or commitments entered into with competitors, customers or suppliers, which constitute an unlawful cartel or abuse of a dominant position. Such agreements, which may be tacit, verbal or written, are prohibited.

Certain types of agreement may be directly prohibited by law. In this case, employees should evidently refrain from participating in such agreements. The same applies to unlawful price cartels, agreements with competitors to *boycott* suppliers or customers, certain agreements aimed at dividing markets or customers, certain product tying agreements etc. Certain exclusivity agreements or licence contracts limiting the scope or resale terms of licenced products may also, in certain circumstances, be considered anti-competitive practices. The Legal Department must be systematically consulted if an agreement may fall into one or other of these categories.

Laws on merger control prohibit certain operations aimed at preventing, restricting or distorting free competition.

Distorting free competition may arise from the creation or strengthening of a dominant position, as well as company mergers within the context of oligopolistic market structures. Achieving or maintaining a dominant position on a

market is lawful under certain conditions. However, a dominant position, while it may have been achieved legitimately, cannot be maintained by illegal practices. The difference between a situation of active competition promoted by the laws on merger control, and the abusive establishment or maintenance of a dominant position, is often a matter of degree. The Company does not consider itself to be in a dominant position on the markets on which it carries out its business, but the employees responsible for establishing the internal policies on competition should consult the Legal Department if the market in question is one on which the Company may be considered as holding or potentially holding such a position.

A company may also be found guilty of an unlawful competition cartel on a market even if it does not have a dominant position on that market. For example, if a company fixes the prices of its products below their cost price in order to beat the competition, this could be considered an unlawful practice. The conditions of assessing and criminalising unlawful practices of resale at a loss, as well as the applicable exceptions, vary according to the jurisdictions. Plans to establish the price of a product of the Company below its total cost price must be reviewed beforehand with the Legal Department.

Competition law has rules governing the invoicing of different prices for the same product.

It may be illegal to charge different prices to two customers for the same product. Assessing the illegal or legal nature of such a practice depends on a number of circumstances of fact and law, notably the existence of certain objective differences between the customers, such as volumes or market positioning (wholesalers, retailers), the existence of cost price variations or differences for the Company (based on volumes or other factors, for example), or even price reductions to align with the competition. These are technical rules which are often difficult to apply.

The definition of any pricing policy containing, for the same product, different prices for several customers, must be reviewed beforehand with the Legal Department, with all facts and circumstances of the case, so that it can verify the compliance of the pricing policy envisaged with the applicable regulations. Similarly, the application of different trading terms between several customers, the termination of long-standing commercial relations with a contractor, or even business relations with a supplier or customer placed in a situation of economic dependency, are very sensitive issues which should be handled with the assistance of the Legal Department.

B. Combatting corruption and influence peddling

Combatting corruption and influence peddling has stepped up at world, European and national levels as a result of the emergence of legislation with extraterritorial scope. This legislation focuses on active and passive acts of corruption and influence peddling of Officials and/or private entities.

Legislation simultaneously penalises corruption and influence peddling which is both “direct” and “indirect”, i.e. perpetrated by third parties acting on behalf of companies or individuals.

The penalties are imposed on both companies and individuals. They may be civil and criminal penalties, notably in the form of heavy fines, prison sentences, bans on access to government contracts, withdrawals of authorisations and repayment of illegitimate profits.

Corruption

- Active corruption is defined as the act of **proposing, promising or agreeing to provide** an unfair advantage (money, gift, service, advantage etc.) to an Official (as defined in article I.C.a) of these Internal Rules) or to a private entity, with a view to getting them to accomplish or refrain from accomplishing an act which comes under or is facilitated by their mandate or their job, or to obtain or retain a contract or another unfair advantage;
- Passive corruption is defined as the act whereby an Official or a private entity **solicits or accepts** offers, promises of money, gifts, services or unfair advantages for accomplishing or refraining from accomplishing an act which comes under or is facilitated by their job or their mandate.

For example, acts of corruption may be:

- Offering a gift or a personal advantage to obtain an unfair favour;
- A “*facilitation payment*” made to guarantee the accomplishment of routine administrative tasks which are governed, however, by a contract, professional rules or the law (e.g. customs controls, administrative formalities etc.);
- Payment for the favourable influence of an intermediary with a decision-making authority;
- Sending privileged invitations to public authority representatives in expectation of something in return;

- A hidden retrocession proposal of an undeclared portion of the commission of an agent (or under-the-table);
- Illegitimate payments, including the hidden payment of kickbacks or commissions to an employee of another company to obtain advantages for the Company, or even the acceptance of kickbacks or under-the-table payments from an employee of another company to obtain advantages for that other company.

Influence peddling

- Active influence peddling is defined as the act whereby any person **proposes, promises or agrees to make** offers, promises, gifts, donations, presents or advantages of any kind, either to an Official, or to a private entity, that they know or believe has an influence on the public authorities, with a view to obtaining from this Official or this private entity, an advantage or a favour benefiting a third party.
- Passive influence peddling is defined as the act committed either by an Official, or by a private entity, who has a real or supposed influence on the public authorities, and who **solicits or accepts** from any person, offers, promises, donations, presents or advantages of any kind with a view to obtaining from that person advantages or favours of any kind on the part of the public authorities.

Acts of influence peddling may, for example, be:

- Giving a sum of money to a person having an important real or supposed network (or address book) relating to the public authorities for the purpose of obtaining from them an advantage of any kind;
- If an Official uses their influence on the senior executives of an authority to have a government contract awarded to a private entity in exchange for holidays abroad for them and their family.

No act of corruption or influence peddling is acceptable.

The Company's policy has always been not to offer any gratification which could represent a violation of the laws combatting corruption in foreign countries, and to adopt the measures to ensure that the actions of our employees, representatives and foreign partners do not place us in a situation of violating these provisions. Due to the very broad scope of French and foreign anti-corruption regulations, and the heavy penalties incurred in their infringement, any transaction, agreement or understanding which could fall into their scope of application must be referred to the Legal Department.

No unlawful or unethical payment is acceptable.

When dealing with customers, suppliers or persons working on behalf of the Company (such as lawyers or lobbyists), no employee should give or receive (or promise or agree to give or receive) any undue payment in cash, goods or services.

The offer of a lawful gratification but which could be misinterpreted must be avoided and, in any case, be subject to prior consultation with the Legal Department.

Employees are evidently free to exercise their right to make personal contributions to the political parties or organisations of their choosing, within the framework set down by the applicable regulations. If, due to particular circumstances, an activity or contribution made personally appears to require the approval of the Company, or constitutes in fact a contribution of the Company itself, or which could appear to have been made with a view to obtaining favourable treatment for the Company, the employee must discuss the matter beforehand with the Legal Department to determine the appropriate measures to prevent any confusion about the personal nature of the employee's actions.

C. Laws combatting money laundering

Money laundering is defined as facilitating, by any means, the erroneous proof of the origin of assets or revenues realised by the committing of a crime or an offence. Assisting with the investment, concealment or conversion of the direct or indirect proceeds of a crime or an offence is also considered an act of money laundering. Laundering may be aggravated if committed habitually or using the facilities provided by the exercise of a professional activity, or if committed as part of an organised gang.

The Company considers itself not to be used, directly or indirectly, by persons engaged in criminal activities. It expects every employee to be vigilant to activities relating to drug trafficking, money laundering or other crimes. If an employee has reason to believe that a transaction relates to monetary sums of a criminal origin, or if they believe

the transaction to be suspect, they should immediately inform their line manager and contact the Internal Audit Director and the Legal Department.

D. Intellectual property

Trademark law prohibits the use of registered trademarks.

Registered trademarks are symbols (including words) used by companies to identify their products or services. For example, “DISNEYLAND” is a registered trademark owned by Disney Enterprises, Inc. Under the terms of French regulations, a nationally registered trademark, in principle, protects the owner of the trademark from the use of the trademark by another person in France. A community registered trademark, however, protects this trademark in all the countries of the European Union. Any reproduction of a third party trademark, or any use or imitation of a third party trademark, which may lead to confusion in the minds of the general public about the source or holder of the rights on a product or service, constitutes an infringement and a violation of the law. It is also prohibited to reproduce the packaging used by a competitor company in such way as to mislead the general public or cause confusion about the product or the trademark under which it is distributed.

Generally speaking, each employee is responsible for respecting all registered trademarks owned by third parties. Employees have no full or partial right of any nature whatsoever on the names “Disney”, “Disneyland”, “Disneyland Resort” or “Euro Disney” (taken in isolation or together, or as part of any other word or name) or on any personality or invented design, trademark, name or logo of the company Disney Enterprises, Inc. or one of its related or affiliated companies. Furthermore, employees have no rights on their use in any manner whatsoever.

Industrial design rights protect the creators of “original and new” industrial designs, which benefit from protection under industrial design and copyright law but not under patents. Any reproduction of a protected industrial design is an infringement and liable for civil and criminal penalties.

Patent law prohibits the authorised use of patented inventions.

All employees must respect the patents belonging to third parties.

The copyrights, patents and registered trademarks of the Company or its reference shareholder are protected.

In application of the licence agreement conferred upon it by its reference shareholder, the Company has a wide range of copyrights, patents and registered trademarks. Substantial efforts and resources are given over to the protection of this industrial, intellectual and artistic property from any violation. Furthermore, any employee who knows or suspects the violation of a copyright, patent or registered trademark belonging to the Company or to its reference shareholder should inform the Legal Department.

ANNEX 2

PROCEDURE FOR OPENING LOCKERS AND OTHER STORAGE FACILITIES AVAILABLE TO CAST MEMBERS FOR CLEANING

1. Notify the Workers' Committee of the dates scheduled for cleaning the lockers.
2. Attach to the above document a photocopy of the document which will be displayed to notify the *employees* of the cleaning work.
3. Information will be displayed in advance in the areas where lockers are to be cleaned.
4. This information will be displayed at least two weeks before the cleaning work.
The document to display will contain at least the following information:
 - > the start date of the cleaning work and opening of the lockers
 - > the end date of the cleaning work
 - > the times of this work
5. At the same time, an information document will also be slipped into the lockers concerned.
6. During the cleaning work, an employee with an elected and/or designated mandate (e.g. from the Workers' Committee, Health and Safety and Working Conditions Committee, staff representative, a safety representative), and 2 *employees* representing the "Costuming" department will be present and ensure the procedures listed below are followed.
7. The cleaning work will take place as follows:
 - > One changing locker at a time will be opened.
 - > The clothes found in the locker will be placed on a rack.
 - > This rack will be situated directly next to the open locker.
 - > After the locker has been cleaned, the clothes will be immediately returned to their original place in the locker.
 - > The other items found in the locker will be placed in a plastic bag which will be hung from the rack. Immediately after the cleaning, they will also be returned to their original place in the locker.
 - > All these handling operations will be monitored by the various representatives.
 - > The door will then be closed again and the representatives will check that the door is locked.

ANNEX 3

NEW CHEMICAL PRODUCT APPROVAL COMMITTEE

In connection with their professional activities, each department may need chemical products, which may be maintenance or cleaning products, plant health products, solvents etc.

Each manager has the responsibility and obligation of informing their staff of the products they are using.

In order to avoid handling these products, an unnecessary and costly stockpiling, and to reduce any risks associated with handling the products, an **APPROVAL COMMITTEE** has been established. The Committee is made up of a representative from the following departments:

- > Purchasing
- > Medical department
- > Fire prevention
- > Environment
- > Expert consulting division

The Committee will be responsible for the **APPROVAL OF ANY NEW CHEMICAL PRODUCT** to be brought into Disneyland which a department wishes to obtain, and the products already used habitually: its role is to issue an opinion on the products used.

If a department wants a Disneyland Paris product which is used in another Disneyland Paris establishment, it should request local approval from: the occupational physician, nurse and occupational health and safety prevention officer, before ordering the product. It should also provide the purchasing department with the necessary information (safety data sheet + local chemical product information sheets) in order to approve the request, after studying the item concerned.

The Approval Committee is considered an expert on the subject and the manager should follow its recommendations.

The purchaser contacted by the manager will initiate the approval request, taking into account the stated requirements and the properties sought.

When issuing the approval, the Committee will communicate the information enabling the head of the establishment or Small World Manager to establish the sheet to be provided to *employees* to inform and train them about safety at their work post:

- > Characteristics
- > Conditions of use
- > Labelling / packaging
- > Possible risks
- > Collective and/or personal protection when using the product
- > Storage, destruction and disposal
- > etc.

Each manager must scrupulously respect, and ensure the respect of, the recommendations of the Committee. If a manager orders products for which approval has not been requested, or whose approval procedure is ongoing, or even for which approval has been refused by the Committee, the damages resulting from the use of these products would engage the liability of the Company. Such actions would constitute a serious breach of the professional obligations of the Small World Manager, who would then be liable to disciplinary action.

ANNEX 4

LIST OF JOBS WHICH MAY BE SUBJECT TO BLOOD ALCOHOL TESTING AND/OR SALIVA TESTS TO DETECT NARCOTIC PRODUCTS BEFORE THE START OF EACH WORK SHIFT

Below is the list of jobs involving stringent safety requirements, vigilance and behavioural control, which may be subject to blood alcohol testing before the start of each work shift, in accordance with article 13 of these Internal Rules.

At present, the jobs requiring stringent safety requirements, vigilance and behaviour control are as follows:

- Heavy goods and super heavy goods vehicle drivers
- General performers, parade performers, show and parade performers if operating machines
- Attraction operators/hosts if driving trains
- Attraction operators/hosts if driving boats
- Attraction operators/hosts if driving vehicles in the parks
- Guest transport drivers (trams, double-decker buses, parade buses, buses)
- Wild West Show technical supervisors
- Stunt Show performers
- Jobs requiring the regular operation of lifting equipment