



The *WALT DISNEY* Company  
and affiliated companies

# EMPLOYEE POLICY MANUAL

# INTRODUCTION



This is an incredible time to be part of The Walt Disney Company, and I feel privileged to have the opportunity to lead such a talented and dedicated workforce. Our company is unique in its proud heritage and promising future, incredible collection of brands and content, and commitment to telling great stories and creating magic in people's lives every day.

The character of our company comes from the effort and integrity of our people. Because we each hold ourselves to the highest standards, our consumers around the world and our colleagues across the company trust us to do the right thing, to behave ethically and respectfully, and to represent and reflect this phenomenal company in the best possible way at all times.

Our Employee Policy Manual reiterates Disney's high standards of conduct, and also offers guidance on issues and situations you may face in the course of your work. I encourage you to review these policies and use them as you perform your important role for this company.

With thanks for your service and enthusiasm,

A handwritten signature in black ink that reads "Robert A. Iger". The signature is fluid and cursive, written in a professional style.

Robert A. Iger

Chief Executive Officer and  
Chairman of the Board  
The Walt Disney Company



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# RESOURCES

To voice a concern that a policy has been violated, call the Guideline at 1-800-699-4870.

## THE GUIDELINE

- Complaints regarding the Company's accounting, internal accounting controls or auditing matters
- Guidance on any business conduct-related issue
- Report suspected unethical/illegal conduct or policy violations at the Company
- Anonymous reporting option

**Online:** [www.disneyguideline.com](http://www.disneyguideline.com)

**Telephone (24/7):** 1-800-699-4870

**Hearing Impaired:** TTY 1-877-576-2569



Questions regarding many HR-related topics, including:

- Benefits, Perks and Paid Time Off
- Leaves of absence (Leave Administration)
- Timekeeping systems
- Changes to personal information and requests to review your personnel file

**Online:** [DToolsHR.disney.com](http://DToolsHR.disney.com)

**Telephone:** 1-321-939-7000

**Telephone (Leave Admin):** 1-321-939-7800

## HUMAN RESOURCES

- Any employee concerns or HR matters
- Questions about policies in this Manual or possible policy violations
- Accommodation requests based on disability or religious beliefs
- As necessary, HR professionals will ensure appropriate members of the HR/Employee Relations team are involved.

Contact information varies by segment/location. Ask a manager for specific contact information.

	For:	Contact:
Other useful contacts	Questions related to Employee Benefits or benefits continuation while on a leave	<b>Add It Up! Benefits Center:</b> <a href="http://DisneyAddItUp.com">DisneyAddItUp.com</a> , 1-800-354-3970
	Company-related legal issues, questions or concerns	<b>Legal Department:</b> 1-818-560-1301
	Notification of lost, stolen or compromised devices or information security breaches, or questions about appropriate use of Company computer systems	<b>Global Information Security/IT Support Center:</b> 1-866-534-7639; Web: <a href="https://infosec.disney.com/">https://infosec.disney.com/</a> Email: <a href="mailto:infosec.FIRE@disney.com">infosec.FIRE@disney.com</a>
	Reporting potential unsafe conditions or safety hazards	<b>Safety Department:</b> 1-818-560-1726
	Reporting security concerns, including thefts, threats or suspicious activity	<b>Global Security:</b> 1-818-560-3220; <a href="mailto:Global.Security@disney.com">Global.Security@disney.com</a>
	Questions or complaints regarding the Company's accounting, internal accounting controls, auditing matters or the Conflicts of Interest and Gift policies	<b>Management Audit Department:</b> 1-818-553-4000, Ext. 1
	Reporting abuse of complimentary admissions or discounts, cash theft, or similar concerns for Parks & Resorts	<b>Advisory &amp; Assurance:</b> <a href="mailto:AA.Internal.Investigations@email.disney.com">AA.Internal.Investigations@email.disney.com</a>
	Verification of employment	<b>Verify Job System (third-party hotline):</b> 1-800-800-4857

# OVERVIEW OF MANUAL



The policies in this Manual apply to all employees of The Walt Disney Company and its subsidiary and affiliated companies (together, we refer to these as the “Company”). All employees of the Company are expected to have reviewed this Manual, to be familiar with its contents, and to conduct themselves consistently with the principles expressed. Failure to do so may result in disciplinary action.

This Manual replaces the August 2015 version of the Employee Policy Manual. The Company may amend, supplement, or rescind any policy or provision in the Manual as the Company deems appropriate. If the meaning or application of a policy is unclear, employees should contact Human Resources.

Within the Manual are references and/or links to additional information, including Company-wide rules, such as the [Standards of Business Conduct](#), and guidelines and practices that apply to certain employees based on their location and/or business segment. As with this Manual, Employees are expected to read and be familiar with the [Standards of Business Conduct](#) and these other work rules.

## THREE IMPORTANT THINGS TO KNOW WHILE READING THIS MANUAL

1. These policies do not alter an employee’s status of employment. All employees of the Company are at will unless subject to a written employment agreement

specifying employment for a particular term. At will employment means the employee can be terminated (or reassigned or demoted) at any time, with or without cause or notice, and the employee can resign at any time with or without cause or notice. An employee’s at will status can only be altered in a document explicitly stating that employment is no longer at will, signed by an authorized representative of the Company.

2. Employees subject to a collective bargaining agreement are covered by these policies except where the collective bargaining agreement provides different terms and conditions.
3. Nothing in this Manual should be interpreted as a restriction on employees’ legal right to discuss their terms and conditions of employment with one another for their mutual protection and benefit. Any employee who believes compliance with the policies in this Manual would conflict with this legal right should promptly discuss the matter with Human Resources.

# EQUAL EMPLOYMENT OPPORTUNITY



The Company proudly provides equal employment opportunity for all employees and applicants.

The Company proudly provides equal employment opportunity for all employees and applicants and makes employment decisions consistent with this principle.

## EMPLOYMENT DECISIONS

The Company's employment actions and decisions – including recruitment, hiring, promotion, compensation, demotion, transfer, layoff, termination and training – are made without regard to an employee's race, religion, color, sex, pregnancy, sexual orientation, gender identity, national origin, age, marital status, veteran status, or disability (mental or physical). The Company complies with any federal, state or local law that provides for additional categories of protection.

See also the [Disability Accommodation](#) policy.

## HARASSMENT

This policy also prohibits harassment based on any of these protected categories. See the [Prohibition of Harassment](#) policy for additional detail.

## COMPLAINTS

Employees who believe they have been harassed or discriminated against, or are otherwise aware of a violation of this policy, should follow the procedures outlined in the [Complaints](#) section of this Manual. These procedures include notifying a manager, Human Resources, or calling the Company Guideline. The Company will not tolerate retaliation against an employee who has made a good-faith complaint or has cooperated with an investigation into a complaint.

Any employee found to have violated this Equal Employment Opportunity policy will be subject to discipline, which may be termination.

# EMPLOYEE CONDUCT AND PERFORMANCE



The Company expects employees to conduct themselves professionally and to perform their jobs satisfactorily.

The Company expects employees to conduct themselves professionally and to perform their jobs satisfactorily and will take action when employees do not meet the Company's high standards. This policy applies to the workplace (both on and off Company property) and in other settings in which employees may find themselves in connection with their jobs (which can occur after regular work hours or away from the regular workplace).

## PERFORMANCE

Employees are expected to perform their jobs satisfactorily and to accept and productively respond to feedback concerning their performance. Performance below our standards may be addressed by such steps as verbal counseling, expectations memos, performance reviews, performance improvement plans, demotion and/or termination, as deemed appropriate by the Company in the particular circumstance. Poor performance or improper conduct may also impact an employee's compensation, work assignment and/or ability to transfer within the Company.

## CONDUCT

While it is impossible to identify every type of improper conduct that may lead to discipline, employees should be aware that the following behavior will subject an employee to some form of discipline (and in some cases, immediate termination):

1. Violation of any provision of this Employee Policy Manual or the [Standards of Business Conduct](#);

2. Conduct toward the employee's managers, coworkers, or anyone with whom the employee comes in contact while performing work for the Company that is unprofessional, discourteous or disrespectful;
3. Disregard for any safety rule or procedure, or any act of violence or other behavior that poses a risk of harm to the employee or others;
4. Any act of theft, dishonesty, and/or falsification;
5. Failure or refusal to comply with a Company directive, including refusal to participate in a Company investigation;
6. Misuse of any Company benefit or perk;
7. Being under the influence of any intoxicating substance while working;
8. Circumvention of an established workplace protocol, operating guideline or approval process.

Improper conduct may be addressed by such steps as verbal counseling, verbal or written warnings, change in scope of responsibilities, probation, suspension and/or termination, as deemed appropriate by the Company in the particular circumstance.

Employees should keep in mind that nothing in this policy, or in the Company's implementation of discipline or performance management, changes the at-will nature of employment, which applies to all employees of the Company unless subject to a specific written agreement that provides otherwise.

# PROHIBITION OF HARASSMENT



Employees are expected to treat others in the workplace with respect.

Employees are expected to treat others in the workplace with respect and must not engage in harassing or bullying behavior. This policy encompasses behavior that is prohibited by law and behavior that, while not necessarily unlawful, nevertheless violates the Company's standards for workplace conduct. The policy applies to the workplace (both on and off Company property) and in other settings in which employees may find themselves in connection with their jobs or that impact the workplace (which can occur after regular work hours or away from the regular workplace).

## HARASSMENT BASED ON A PROTECTED CATEGORY

Harassing conduct that is based on a protected category is prohibited by law and will not be tolerated by the Company. "Protected categories" include race, religion, color, sex, pregnancy, sexual orientation, gender identity, national origin, age, marital status, veteran status, disability (mental or physical) and any additional category set forth in any federal, state or local law. Conduct that may be considered as contributing to unlawful harassment when based on a protected category includes slurs, offensive jokes or teasing and disparaging comments – whether done in person or phone, by email or text, visual displays, or otherwise. Such conduct can be unlawful when it is particularly egregious or when it is repeated, creating a hostile working environment and altering the conditions of employment.

Sexual harassment is one form of harassment based on a protected category and prohibited by law and this policy. Hostile environment sexual harassment can include any of the previously mentioned types of conduct as well as offensive touching, staring and stalking, gestures, violating personal space, requests for sexual favors, conversation containing sexual comments and other unwelcome advances. In addition to hostile environment harassment, sexual harassment can take the form of "quid pro quo" harassment, which includes making unwanted sexual advances and/or requests for sexual favors where submission is a condition of employment or where submission to or rejection of the advances or requests is used as the basis for employment decisions.

In addition to co-workers, employees are prohibited from harassing customers, guests, contractors, and any others with whom they interact in their work environment.

While harassment based on a protected category must meet certain legal standards to be unlawful, such as being "severe or pervasive," these standards do not necessarily have to be met for the Company to determine that conduct has violated Company policy. The Company's prohibition of harassment encompasses a broader range of conduct than what is prohibited by law.

## BULLYING

Abusive conduct, often referred to as "bullying," is a type of conduct that may not be unlawful but is against Company



# PROHIBITION OF HARASSMENT (CONT.)



policy. Bullying need not be related to a protected category. Bullying in the workplace includes repeatedly making derogatory or insulting remarks; intentional targeted isolation; serious or repeated verbal or physical conduct that could reasonably be considered threatening, intimidating or humiliating; or intentionally sabotaging or undermining another's work performance.

## COMPLAINTS AND INVESTIGATIONS

The Company strongly encourages employees to immediately speak up if they are subject to or witness conduct prohibited by this policy. Employees who believe they have been subjected to harassment or bullying by a co-worker, guest, or other person in their workplace, or are otherwise aware of a violation of this policy, should follow the procedures outlined in the [Complaints](#) section of this Manual. These procedures include notifying a manager, Human Resources, or calling the Company Guideline.

The Company takes reports of discrimination and harassment very seriously. Managers who become aware of possible violations must notify Human Resources or Employee Relations. Every complaint will be investigated in the manner and to the extent appropriate to the circumstances, and investigations will be conducted as confidentially and expeditiously as possible. Employees have an obligation to cooperate fully and to openly and honestly share information in any Company investigation.

The Company will not tolerate retaliation against an employee who has made a good-faith complaint or has cooperated with an investigation into a complaint. Employees who believe they have been retaliated against should immediately report the conduct, using one of the avenues outlined in the [Complaints](#) section of this Manual.

## DISCIPLINE

Any employee found to have violated this Prohibition of Harassment policy (including the prohibition of retaliation) will be subject to discipline, which may be termination.

# COMPLAINTS



The Company provides multiple avenues for employees to raise concerns or complaints.

Employees are encouraged to first discuss their work-related problems with their manager but are provided various avenues of complaint if such a discussion is not productive or is not practical given the nature of the complaint.

## COMPLAINTS TO MANAGERS

The Company encourages employees to first raise issues with their immediate manager, and to do so as soon as the issue arises. If this complaint does not resolve the issue, employees are encouraged to raise the issue to the next level of management. Ideally, complaints are resolved within the employee's department.

## OTHER AVENUES OF COMPLAINT

Employees also may raise a complaint to Human Resources. Alternatively, employees may call the Company Guideline at (800) 699-4870. Complaints made to the Guideline may be made anonymously.

## NO RETALIATION

The Company will not tolerate retaliation against an employee who has made a good-faith complaint or has cooperated with an investigation into a complaint. An employee who believes he or she has been retaliated against should immediately report the conduct, using one of the avenues outlined above.

# CONFIDENTIAL INFORMATION



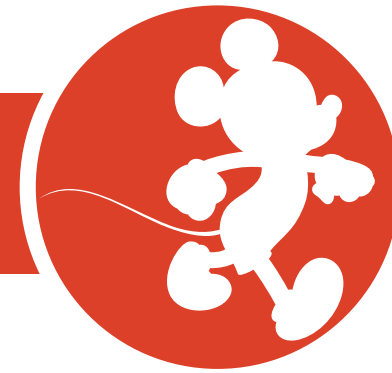
The protection of confidential and proprietary business information and trade secrets is vital to the Company's interests and success.

The protection of confidential and proprietary business information and trade secrets is vital to the Company's interests and success. We trust our employees to receive confidential information and not use or share it except for Company business purposes. Confidential information should never be used for an employee's personal benefit or disclosed to others inside or outside of the Company who don't have the right to it – and the need for it – to carry out their assigned work or meet the business need. In addition, accessing confidential Company information without a need to know is prohibited. Violation of this policy may result in disciplinary action, which may be termination.

The obligation to not use or disclose confidential information continues even after employment with the Company ends.

Employees are expected to familiarize themselves with and follow the "Protecting Company Assets" section of the [Standards of Business Conduct](#), which contains additional information, including a definition and examples of "confidential information."

# CORPORATE IDENTITY AND USE OF COMPANY NAMES, CHARACTERS OR SYMBOLS



The Company's trademark names, fanciful or copyrighted characters, and other intellectual property may only be used in connection with official, authorized Company business, and may not be used by anyone to imply that the Company sponsors, endorses or is connected with any business, program, product, service, club or organization not part of or directly related to the Company's business activities.

## COMPANY MARKS, LOGOS, CHARACTERS & NAMES

This policy applies to all uses of Company marks, logos, characters and names, including, for example, on stationery materials (such as letterhead, envelopes, business cards and note paper), reports, presentation materials, memoranda, business to business websites, email messages, fax cover sheets, articles of clothing and novelty items, except on merchandise authorized for sale to the public in the regular course of the Company's business.

Company marks, logos, characters and corporate names must be used consistently and precisely. The design or alteration of any Company logo or mark, or the use of Company logos, marks or characters on any Company materials, requires prior approval from the Corporate Graphics Department.

Company logos, marks or names may not be used in conjunction with logos, marks or names of non-Company entities or businesses.

## COMPANY STATIONERY MATERIALS

Electronic versions of Company stationery may not be used, except in limited cases by Company attorneys. All documents must be printed on pre-printed stationery.

Approved business stationery is available for purchase by Casual Buyers on the eSource Stationery Catalog from Anderson LA (in North America).

Employees in other regions should contact their local brand management or HR representative for instructions on purchasing Company-approved stationery. Stationery items besides those listed on the site must be approved by Corporate Brand Management before ordering. All stationery materials must be printed by a Company-approved print house. User-created and computer-generated stationery items are not allowed.

Fax cover sheets may only identify the sender's name, telephone and fax number and may not include the likeness of a copyrighted character, a Company logo, or a Company name.

Employees may not use business cards without their name, title and the legal name, or approved trade name, of their employing company. Employees who use email signature blocks must not use an unofficial title or a company name different from the legal name, or approved trade name, of their employing company. Departments may not use stationery materials printed with their departmental name or use a logo different from the legal name, or approved trade name, of their employing company.

Only Company employees may use Company stationery materials. Employees of other companies or entities, including independent contractors and agency temps, may not use stationery materials or email signature blocks with Company logos, marks, or corporate names, even if they have offices on Company property.

## NO INFRINGEMENT

Employees must respect the laws regarding copyrights, trademarks, rights of publicity and other intellectual property rights and must not infringe on Company or third-party copyrights, logos, brand names, taglines, slogans or other trademarks.

# CONFLICTS OF INTEREST



Employees should make objective decisions on behalf of the Company and avoid situations where a conflict (or apparent conflict) exists between the Company's interests and their own, personal interests.

Conflicts of interest are addressed in the [Standards of Business Conduct](#), which all employees are expected to read and follow.

# PERSONAL AND FAMILY RELATIONSHIPS



Certain types of personal relationships must be disclosed.

The Company wishes to avoid the actual or perceived conflicts of interest, undue influence, favoritism, opportunities for collusion, and confidentiality concerns which may result from family members working together (“family relationships”), and from romantic or sexual relationships in the workplace (“personal relationships”), which can raise additional concerns such as potential sexual harassment.

## CATEGORIES OF WORKPLACE RELATIONSHIPS THAT ARE STRONGLY DISCOURAGED

The Company does not impose a strict prohibition on **all** personal and family relationships, but it may prohibit employees in a personal or family relationship from working together based on the specific circumstances. Regardless of the specific circumstances, the Company strongly discourages personal and family relationships in the following situations:

1. Relationships between a manager at any level and a direct report or the subordinate of a direct report (that is, between two individuals within a chain of command). For purposes of this policy, an employee is a manager’s direct report if the manager directly or indirectly manages or assigns work or significantly influences key terms and conditions of employment such as compensation, benefits, performance evaluation, assignments, promotion or disciplinary action.

2. Relationships between employees (including non-managerial employees) where one employee assigns the work duties or sets the work schedule of the other.
3. Relationships between two employees where the nature of the employees’ respective positions in the Company, or the functions they perform, could compromise the business judgment of one or both of the employees.

## OBLIGATION TO DISCLOSE

If an employee is involved in any of the above categories of personal or family relationships, or similar close personal relationship, he or she must notify Human Resources immediately. Further, if a manager is aware that one or more employees under his or her supervision are involved in such a relationship, that manager must notify Human Resources immediately. In either instance, failure to raise the issue to Human Resources is a violation of this policy and is grounds for disciplinary action.

## ACTIONS THE COMPANY MAY TAKE

When the Company becomes aware of such a relationship, through notice or otherwise, the Company will determine what action is appropriate under the circumstances to address its business concerns. Appropriate action can include reassignment, a change in job responsibilities, or termination.

# COMPANY PROPERTY



Company equipment and other Company property are provided to employees for business purposes only. Examples of Company property include, but are not limited to, computers, mobile devices, email and other electronic records, documents, phones, desks, cabinets, lockers, clothing, identification cards, vehicles, keys, access cards and office supplies.

## NO EXPECTATION OF PRIVACY

When using Company property, employees must comply with all Company policies and have no expectation of privacy. The Company reserves the right to access and inspect Company property when it deems appropriate and without notice.

## POSSESSION/USAGE

Employees must ensure that Company property in their use or possession is kept secure and in good repair. Immediately upon separation from the Company, employees must return to their manager or Human Resources any and all Company property in their possession.

## NO DUPLICATION

Employee identification cards, Company keys and access cards may not be duplicated.

See also the [Computer Usage and Security](#) and [Employee Security](#) policies

# ATTENDANCE



## SATISFACTORY ATTENDANCE

Employees must report to work, on time, unless their absence is excused. Absenteeism and/or tardiness may subject the employee to disciplinary action.

Employees who are unable to work, or who expect to be late, must notify their manager (or, if unreachable, another department manager) as soon as possible before their start time. Employees also should refer to and comply with any specific department policies and procedures.

## JOB ABANDONMENT

Absence for three or more consecutive work days without notification to an employee's manager will be considered job abandonment, and the employee will be separated from the Company absent extraordinary circumstances.

## RECORDING TIME

Employees must keep accurate attendance records. Employees who falsify a time record will be subject to termination.



# SOLICITATION AND DISTRIBUTION



The Company limits solicitation and distribution on Company premises.

To maintain a positive and productive business environment where employees can focus on the Company's business, free from distractions and interruptions, the Company limits solicitation activities and distribution of materials on Company premises.

## DEFINITIONS

"Distribution" includes handing out, emailing, faxing or otherwise communicating leaflets or other written literature; dispensing goods for purchase; and other similar activities.

"Solicitation" includes asking someone to make a donation; to purchase goods, services or tickets; to support a cause; to join or participate in an organization or club; and other similar activities.

"Working time" is any time when an employee's duties require that they be engaged in work tasks, but does not include their own time such as meal periods, breaks, or the time before or after their scheduled work hours.

## POLICY FOR EMPLOYEES

Employees may not use Company email or computer systems to solicit for commercial ventures, or otherwise for their individual/personal benefit. Notices or other written material may not be posted on Company property without prior approval of the Company.

Employees are prohibited from engaging in solicitation or distribution when either they or the person they are soliciting or distributing to is on working time. Additionally, employees may only engage in distribution of tangible items in non-working areas, such as break rooms. Any permitted solicitation or distribution should be done in a respectful manner.

## POLICY FOR NON-EMPLOYEES

Non-employees are not allowed onto Company premises to engage in solicitation or distribution activities at any time. This includes solicitation or distribution through Company email.

# COMPLIMENTARY ADMISSION PRIVILEGES, DISCOUNTS AND PERKS



Employees must comply with the terms and conditions of any complimentary admission privilege, discount or perk.

The Company provides eligible employees with complimentary admission privileges, and a variety of discounts and perks, which employees must use consistently with their terms and conditions. The Company may modify, substitute or discontinue any complimentary admission privilege, discount or perk at any time in its sole discretion.

## EMPLOYEE RESPONSIBILITIES

Employees are responsible for knowing and abiding by the terms and conditions attached to the use of any complimentary admission privilege, discount or perk.

Main Entrance Pass privileges and complimentary tickets may not be purchased, sold, offered or exchanged for anything of value. Offering to participate in any of the above activities is also prohibited.

When using a discount, employees must make the purchase themselves. Merchandise discounts are for employees' personal use only and may not be used to purchase merchandise with the intent to resell. Employees may not extend their discount to others, including other employees who receive a lesser discount.

Violations of the applicable terms and conditions or other abuse of complimentary admission privileges, discounts or perks may result in the loss of the benefit, as well as disciplinary action, which may be termination.

Employees are expected to familiarize themselves with the applicable terms and conditions contained in the [Complimentary Admissions and Discounts Policy](#).

## SAMPLES AND PROMO ITEMS

Employees may be provided sample or promotional items in the course of their work. These items may not be sold, traded or exchanged for anything of value.

# SPEAKING ON BEHALF OF THE COMPANY



To ensure that information provided to the public is complete, consistent and accurate, employees should not speak on behalf of the Company unless they are an authorized Company spokesperson or receive written authorization from their vice president and their segment's Communications Department.

Employees who receive an invitation to speak at a seminar or other event in their capacity as a Company employee or on a topic related to work for the Company must advise their manager and obtain written approvals from their vice president and their segment's Communications Department prior to accepting the invitation. In addition, employees must comply with the "Gifts, Entertainment and Hospitality" section of the [Standards of Business Conduct](#) to the extent they receive anything of value in connection with the speaking engagement (e.g., speaker fees, meals, travel costs), and they must disclose any such compensation in their request for written approval.

Employees should also familiarize themselves with the "Speaking on Behalf of our Company" section of the [Standards of Business Conduct](#) and the [Use of Social Media](#) policy.

# TRAVEL AND EXPENSE



Employees must comply with the Company's Travel and Entertainment policy.

The Company reimburses employees for reasonable business expenses and expects adherence to its policies on travel and other expenses.

## COMPLIANCE WITH POLICY

Employees must be familiar with and be in compliance with the Company's [Travel and Entertainment Policy](#). Failure to comply with this policy will subject the employee to disciplinary action.

Use of Corporate Cards for personal use is prohibited, even if the employee reimburses the Company for those charges.

Employees who incur business meal expenses are responsible for adhering to the policy's per person cost limits, and their expense report for the business meal must include the names of the individuals present, their titles and Company name.

Employees who falsify an expense report will be subject to termination.

# UNSOLICITED SUBMISSION OF CREATIVE IDEAS



To avoid disputes or misunderstandings, the Company does not accept unsolicited submissions of creative ideas.

It is the Company's long-standing policy not to accept, but rather to reject in a courteous fashion, the submission of creative ideas without prior authorized invitation.

The term "idea" includes all creative suggestions, artwork, designs, theme park attraction concepts, game proposals, computer or mobile technology apps, scripts, treatments, manuscripts and songs, in whatever form, from whatever source, and however communicated.

## PURPOSE

This policy aims to prevent disputes or misunderstandings regarding the origin of projects developed by the Company. Adhering to this policy helps to protect the Company against claims that a creative idea reviewed by the Company, or left unreviewed in Company files, is the source of a project the Company develops.

## WHAT TO DO

If a submission is attempted by telephone or in person, employees should stop the conversation and politely inform the individual that Company policy does not permit the acceptance of unsolicited creative ideas.

For written submissions, employees should stop reading the material as soon as they realize it is the submission of an unsolicited creative idea and send the material to the Legal Department, using the instructions, transmittal form and contact information found [here](#).

Employees should not retain copies of any unsolicited ideas, make any notes about the ideas, or forward information about the ideas to others.

## EXCEPTIONS

The acceptance for review of scripts, treatments, and presentations submitted to authorized staff of the Company's television and motion picture studio segments, in the regular course of their business, by or through agents, producers, or managers recognized as customarily making such submissions, is permitted.

## EMPLOYEE SUBMISSIONS

This policy applies to creative ideas that employees offer that are outside the scope of their ordinary responsibilities, unless they are submitted in connection with an authorized invitation, contest or procedure.

# COMPUTER USAGE AND SECURITY



Employees must use the Company's computer resources responsibly and in an appropriate manner.

Employees must use the Company's computer resources responsibly and in an appropriate manner. Misuse of the Company's computer systems will result in disciplinary action, which may be termination.

## APPROPRIATE USE OF COMPANY SYSTEMS

The Company's computer systems may not be used for unlawful activities, including copying, downloading, distributing, streaming, storing, displaying or using software or other copyrighted materials in violation of copyright laws or license agreements. Employees who are uncertain as to the appropriate use of Company systems should seek clarification from their manager or Global Information Security (GIS).

Software or other copyrighted material licensed from a third party may be used only in accordance with the license agreement. Employees unsure about appropriate use should contact the Legal Department.

The Company's computer systems are provided for business purposes, and employees should use their Company email address when conducting Company business. The Company understands that employees will use these systems from time to time for personal activities. Employees should have no expectation of privacy when doing so. Such personal use should be reasonable and must not interfere with work performance or create cost or liability to the Company. Employees may not use these systems to solicit for commercial ventures, or otherwise for their individual/personal benefit.

Employees may not engage in conduct that is inappropriate or prohibited by law, or that violates the Company's [Prohibition of Harassment](#) policy, [Use of Social Media](#) policy, or other policies.

## COMPANY OWNERSHIP AND ACCESS

Email messages and other electronically stored documents and data pertaining to or embodying Company business, wherever stored, are Company property. Such messages, documents and data should be preserved in accordance with Company retention policies and made available to the Company upon request.

Management, in its sole discretion and without further notice, may access, monitor, review, remove, disclose and/or control any aspect of access to or use of Company computer systems (e.g., equipment, software, systems, networks, data, documentation, or files, including individual employee computer files, email messages, instant messages or Internet usage).

The use of computer passwords to access the Company's equipment or systems does not constitute any promise of confidentiality to any employee regarding any communications or material created, accessed or stored through the use of such passwords.

Computer programs, applications and data purchased or licensed by or developed for the Company are the property

# COMPUTER USAGE AND SECURITY (CONT.)



of the Company or its licensors and must not be sold, licensed, released or loaned outside the Company without the prior express permission of the Chief Information Officer and a written agreement approved by the Legal Department. All purchases, leases or licenses by the Company of computer hardware or software or acquisitions of cloud or hosting services must be made pursuant to written agreements approved by the Legal Department.

## PROTECTING THE COMPANY'S ASSETS AND INFORMATION

All employees are required to ensure that the Company's assets and information are protected against improper use, disclosure, theft, compromise or destruction. Employees must:

- Not work around or disable passwords, virus detection or other security protections;
- Not disclose or share passwords or other security features;
- Not attempt unauthorized access to any Company computer system, device, site or asset;
- Not attempt to access any Company computer system, device, network, site or other asset from any unauthorized device, location or software;
- Immediately inform GIS of any attempted or actual information security breach or lapse in information security;
- Participate in periodic security awareness training;
- Not copy, move, store or back up the Company's proprietary or confidential information to:
  - a personally-owned computer or storage device;
  - a personal mobile device that GIS has not approved as a "trusted device"; or
  - an external cloud service that has not been approved by GIS.

- Not use any non-Company system (e.g., cloud-based file-sharing sites) for the transmission or receipt of business-related information or assets unless the system has been approved by GIS;
- Ensure that all activity involving Open Source Software complies with the Company's [Open Source Software Policy](#). This includes using Open Source Software, contributing to Open Source projects, releasing software as Open Source and distributing applications that contain Open Source Software.

Additional detailed information may be found in GIS's [Information Security Policies and Standards](#).

## NON-EMPLOYEES' USE OF SYSTEMS

Customers, suppliers or other third parties may use Company computer systems only when authorized in writing by a vice president of the business unit with which they are associated. Employees responsible for a contract with any such authorized third party are responsible for ensuring the third party's compliance with this policy.

## TERMINATED AUTHORIZATION

Employees whose employment with the Company has terminated or whose duties no longer require use of Company computer systems must return all Company property and equipment to their manager.

Employees responsible for a third party contract that has terminated must contact their system administrator to coordinate the immediate return of all computer assets to the Company.

# PERSONAL DEVICES AT WORK



Employees may use personally-owned tablets, smartphones and other devices for work-related purposes, subject to certain restrictions and security requirements.

The Company offers a “Bring Your Own Device” (BYOD) program to allow employees to use personally-owned tablets, smartphones and other devices for work-related purposes (“Devices”).

Employees who participate in the BYOD program must ensure the security of Company confidential information and technology assets. Depending on the Device’s level of access to the Company’s network and applications, the Company will require additional security features, including encryption and security software. Participating employees agree to grant the Company access to their Devices, if needed, to investigate the potential misuse of Devices or Company data.

## EMPLOYEE RESPONSIBILITIES

Employees are expected to use Devices ethically and adhere to all Company policies on acceptable use, security and confidentiality, including the [Global Information Security \(GIS\) Information Security Policies and Standards](#), the [Standards of Business Conduct](#), and the [Computer Usage and Security Policy](#).

Company confidential information may only be accessed using Company-authorized applications, and some particularly sensitive confidential information may never be accessed on a Device. Employees must not copy, move, store or back up Company confidential information on their Device

to any other non-Company electronic device or storage media or to external cloud services.

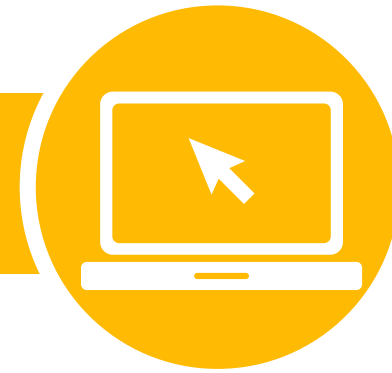
Employees must immediately notify GIS if their Device becomes infected with a virus or is lost, stolen or otherwise compromised. Employees must also report immediately any unauthorized access to or disclosure of Company information on that Device.

## REMOTE WIPING

The Company can remotely wipe (erase) the contents of a Device and terminate its access to Company systems should it be used inappropriately, lost, stolen, compromised, or transferred to a different owner, or upon termination of employment. Employees are responsible for periodically backing up their personal data, since the Company will not be able to restore this data.



# USE OF SOCIAL MEDIA



The Company provides certain social media networks and other online publishing and discussion tools to allow employees to communicate and collaborate internally. When using these platforms, or engaging in other online activities that relate to the Company's business interests, employees must comply with Company policy.

## RESPONSIBILITIES WHEN USING COMPANY PLATFORMS

1. When using Company platforms, employees must comply with Company policies, including this Employee Policy Manual and the [Standards of Business Conduct](#).
2. Employees must protect the Company's confidential or proprietary information. Even on platforms hosted by the Company or limited to Company personnel, employees should use caution to ensure such information is not disclosed beyond those who are authorized to receive it.
3. Company platforms are intended to foster productivity, efficiency and teamwork. Employees should avoid unnecessary or unproductive arguments and refrain from discussing sensitive or inflammatory subjects that are not related to work, such as politics or religion.
4. Employees should respect the privacy of coworkers, guests and others and not post sensitive information about another individual which that individual might wish to remain private.

## RESPONSIBILITIES WHEN USING OTHER SOCIAL MEDIA

1. Employees' online activities conducted on non-Company platforms, but which relate to the Company's business interests, also are subject to Company policies, including this Employee Policy Manual and the [Standards of Business Conduct](#).

2. Employees should never disclose confidential or proprietary information such as Company financial information, business performance, business plans, prospects or other information that it is in the Company's interests to keep confidential. For example, employees should not:
  - Tweet about a new theme park ride before it is announced to the public;
  - Post photographs that reveal secret casting information;
  - Blog about a potential merger or partnership; or
  - Post Company earnings information that has not been made public.
3. Employees should not use their work email address when posting online their personal opinions that are not related to work.
4. Employees may not use usernames for personal social media accounts that imply they are speaking on behalf of the Company.
5. Employees must follow the [Corporate Identity](#) policy, including not infringing on the Company's or a third party's intellectual property rights.
6. In online discussions related to the Company, employees should make clear they are not speaking for the Company (unless they are specifically authorized to speak on behalf of the Company on the particular topic).

## REPORTING IMPROPER CONDUCT

Employees with information about an online post that violates these or other Company policies should report it to their manager, Human Resources, or the Guideline at (800) 699-4870.

For additional guidelines and information, employees should refer to the [Confidential Information](#) policy and relevant segment-specific policies, such as those for talent, reporters and other public-facing employees.

# UNAUTHORIZED RECORDINGS



Employees must not record others without their knowledge and consent.

Employees must not record others without their knowledge and consent.

## NO RECORDING WITHOUT CONSENT

The Company strives to maintain a culture of trust and respect among employees. In addition, all employees are expected to guard against the intentional or unintentional disclosure of Company confidential information.

For these reasons, unless the recording is authorized as part of the employee's work, the Company prohibits employees from recording their coworkers (or others they encounter in the course of their employment) at any time, without prior permission from the person being recorded. This prohibition applies, but is not limited, to interactions in person as well as those by phone or other mobile device, to audio and/or video recording, and to recordings made by cameras, phones, or "wearable" devices such as computer-enabled watches or glasses.

## RESTRICTIONS ON RECORDING DEVICES

The Company may prohibit the possession of any recording device at certain Company events and in certain areas of Company property and otherwise reserves the right to restrict the possession or use of recording devices on Company property.

## LEGAL RESTRICTIONS

Employees also should be aware that federal and state laws regulate the recording of conversations.

# FLEXIBLE WORK ARRANGEMENTS



The Company supports flexible work arrangements that benefit both the Company and the employee.

As part of a broader strategy to promote a positive, effective and productive work environment, the Company supports flexible work arrangements that are feasible and make good business sense.

## ELIGIBILITY

Regular and Project/Supplemental employees who are not subject to a collective bargaining agreement are eligible to request a flexible work arrangement. All flexible work arrangements need to be approved by an employee's manager. Employees must be in good standing for their role to be evaluated. Managers may also consider new employees coming into the organization for flexible work arrangements.

The Company has complete discretion as to whether to grant a request for a flexible work arrangement. Managers will review flexible work arrangement requests primarily in terms of the business needs of the organization, and they will also consider the nature of the job role and factors such as the employee's work style, skill set, performance and initiative.

## TYPES OF FLEXIBLE WORK ARRANGEMENTS

Flexible work arrangements are divided into two main categories. "**Flexible Workplace**" arrangements allow an employee to perform the normal duties and responsibilities of a position from home or other offsite location. "**Flexible Schedule**" arrangements allow an employee to work hours that are different from the standard hours set by a business.

Flexible Schedule arrangements can include any of the following concepts:

- **Flextime:** Allows an employee to start and end work earlier or later than core business hours or what is conventional in a particular department
- **Part-time:** Allows an employee to be regularly scheduled for 29 or fewer hours each week
- **Job Share:** Allows one full-time position to be performed by two part-time employees
- **Compressed Workweek:** Allows non-exempt employees to condense a full-time schedule into fewer than five business days in one week or fewer than ten business days over two workweeks (requires express approval of Human Resources Business Partner in addition to employee's manager)

## EVALUATION AND TERMINATION OF FLEXIBLE WORK ARRANGEMENTS

Flexible work arrangements may begin with a trial period and should be evaluated regularly thereafter. Employees with a flexible work arrangement are expected to maintain the same levels of performance and productivity as they would if they had a standard work arrangement. The Company may terminate or adjust a flexible work arrangement at any time in its sole discretion.

# NON-EXEMPT EMPLOYEE TIMEKEEPING



Employees must accurately record their time.

Employees are classified as either “exempt” or “non-exempt” and will be informed of their classification at time of hire or upon promotion or transfer to a new position.

Some key differences between the classifications are that non-exempt employees are paid based on the hours they work and record in the time system, and they are provided rest and meal periods and receive additional pay for overtime worked, consistent with applicable law.

## RECORDING TIME WORKED

Non-exempt employees must accurately record all time worked – wherever and whenever they perform work for the Company. They are responsible for reviewing their time records on a daily basis to ensure that they accurately reflect their workday, including their **actual** start and end times, meal periods taken, any overtime worked, and any other non-working time. Employees are expected to be working whenever they are on the clock.

Unless they receive prior approval from their manager, non-exempt employees should not work before their scheduled work day begins, continue working after their workday ends, work through lunch or take work home (including using mobile devices for work-related purposes outside of their scheduled work hours). In all cases, employees must accurately record any such time worked.

Employees who falsify time records or record time for another employee will be subject to termination.

## OVERTIME PAY

The Company pays overtime to non-exempt employees in accordance with applicable law. Employees must obtain approval from their manager before working overtime. All overtime hours worked must be properly recorded in the time system. Employees may not work “off the clock” to avoid having to record overtime.

## REST BREAKS AND MEAL PERIODS

The Company provides non-exempt employees with periodic paid rest breaks and unpaid meal periods during designated working hours in accordance with applicable law. The actual schedule of rest breaks and meal periods will be determined by employees’ manager or other authorized employees. Employees should be prepared to resume working promptly at the end of their rest breaks and meal periods.

# EMPLOYMENT REFERENCES AND REQUESTS FOR EMPLOYEE INFORMATION



The Company verifies employment history through a hotline at 1-800-800-4857.

The Company does not provide substantive employment references for current or former employees but will verify their salary and employment history.

Through a verification hotline, the Company provides only the following information to third parties, including prospective employers, who request the information:

- **For current employees:** Verification of salary, employment, job title and hire date.
- **For former employees:** Verification of employment, salary and job title at termination, and hire and termination dates.

Verification of employment should be done only through the hotline. Employees are not authorized to provide substantive references on behalf of the Company. Employees who receive requests for employment references or employment verification for another current or former employee should refer the requester to the verification hotline, at 1-800-800-4857.

Employees who wish to respond personally to an employment reference request must make explicit in the reference that they are doing so in a purely personal capacity; may not imply that they are representing the Company in doing so; and must not use or disclose any information that was learned solely through their status as an employee of the Company.

# EMPLOYEE DATA AND PERSONNEL FILES



The Company collects various types of personal information and input from employees and maintains confidential personnel files related to their employment. The Company takes appropriate steps to secure that information and prevent unauthorized disclosure.

“Personal information” can include an employee’s name, contact details, date and place of birth, Social Security Number, dependent information, medical information, and other personal information related to accommodations or time off requests.

## USE AND DISCLOSURE OF PERSONAL INFORMATION

The Company uses personal information for various reasons, including:

- administering compensation, benefits and leaves of absence
- learning and development, performance evaluation and career advancement

The Company limits access to employee personal information to only those authorized staff members with a business need to know. The Company only shares personal information outside the Company in limited circumstances, such as:

- disclosure to third parties, such as payroll servicers, who provide employment-related services, subject to restrictions that they may not use it for purposes other than the services they provide
- disclosure in response to an employee request, such as to verify employment
- where legally required, such as in response to a subpoena, or in accordance with a collective bargaining agreement or request from a government agency
- to protect the Company’s rights and interests

## EMPLOYEE RESPONSIBILITIES

Employees with access to personal information share in the responsibility to protect that information. Employees must be familiar with and follow Company rules and procedures relating to privacy and data protection, including those contained in the [Computer Usage and Security Policy](#), [Information Security Policies and Standards](#), and the [Appropriate Use of Social Security Data Policy](#).

Employees are responsible for keeping their personal information up-to-date, including home address, phone numbers, emergency contacts, marital status and dependents. To view or update personal information, visit [D Tools HR](#).

## EMPLOYEE PERSONNEL FILES

Employees’ personnel files are maintained by Global HR Operations. Employees may review or receive a copy of their personnel file by making a request (with reasonable notice and reasonable frequency) to Global HR Operations via [D Tools HR](#).

Files related to medical leaves of absence, or otherwise containing private medical information, are stored separately from personnel files and are treated with appropriate confidentiality and sensitivity.

For additional information, refer to the [Employment References and Requests for Employee Information](#) policy.

# CRIMINAL BACKGROUND CHECKS



As part of efforts to provide a safe working environment to all employees, the Company conducts pre-employment criminal background checks on persons offered employment and conducts such checks on current employees in certain situations.

## PRE-EMPLOYMENT BACKGROUND CHECKS

The Company conducts pre-employment criminal background checks on every person offered employment with the Company, to the extent permitted by law. Such checks are conducted in compliance with all pre-adverse action and adverse action notification legal requirements.

## BACKGROUND CHECKS DURING EMPLOYMENT

The Company will conduct a criminal background check on a current employee, to the extent permitted by law, in the following circumstances:

- The employee transfers to a child care, security, or sensitive cash handling or finance position; or
- The Company has reason to believe the employee has been involved in criminal activity, convicted of a crime or is the subject of a pending criminal charge and such information is relevant to the employee's suitability for employment.

Employees who are subject to a collective bargaining agreement will be governed by the terms of that agreement.

## SUITABILITY FOR EMPLOYMENT

When evaluating whether an applicant or employee with a criminal conviction is suitable for employment in a particular position, the Company considers all circumstances surrounding the conviction, including the nature of the crime, how long ago it was committed, and any mitigating factors.

## EMPLOYEE'S OBLIGATION TO NOTIFY

Employees must disclose any drug-related convictions based on events occurring in the workplace or convictions of any type, no matter where the events occur, if the crime bears a relationship to the employee's job duties (such as a DUI by an employee whose duties involve driving; financial impropriety by an employee who handles financial transactions; or a crime involving harm to children by an employee whose duties involve interaction with children). The disclosure must be made to Human Resources within five days of the conviction.

# BOARD SERVICE



Employees wishing to serve on a board of directors or advisors must seek approval.

Employees who wish to serve on an outside organization's board of directors or board of advisors must follow an approval process. The process and the considerations for approval depend on the type of outside organization involved.

## PRIVATE FOR-PROFIT COMPANIES

Any employee who wants to serve on a board of directors or board of advisors of a private for-profit company must first submit a request to their senior vice president or above (the "Reviewer"). The Reviewer will evaluate the request to determine whether the proposed board service appears to: 1) unduly interfere with the employee's duties for the Company; or 2) present a conflict of interest with the business of the Company. If based on this evaluation the Reviewer supports the request, he or she will forward it to the Company's Management Audit department. If the Reviewer does not support the request, it will be considered declined.

If the request is supported by the Reviewer, Management Audit will review it and advise the employee and the Reviewer of the Company's decision and any terms or conditions it has set. Compensation for serving on any board will be limited to five percent of the employee's yearly overall Company compensation or \$25,000, whichever is less.

## PUBLIC COMPANIES

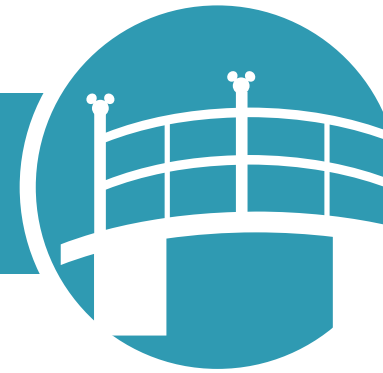
Service on a board of directors or advisors of a public company (i.e., one whose stock is publicly traded) will be presumptively prohibited. Requests for approval, which are rarely given, must be directed to Management Audit for review.

## NON-PROFIT OR NOT-FOR-PROFIT ORGANIZATIONS

Requests to serve on a board of directors or advisors of a non-profit or not-for-profit organization will be evaluated by the Reviewer. The Reviewer will evaluate the request to determine whether the proposed board service appears to: 1) unduly interfere with the employee's duties for the Company; or 2) present a conflict of interest with the business of the Company. If based on this evaluation the Reviewer supports the request, it will be considered approved, and a description of the request with the Reviewer's support will be provided to Management Audit by the Reviewer. If the Reviewer does not support the request, it will be considered declined. If desired, the employee may submit the request to Management Audit for evaluation of the Reviewer's decision.



# BRIDGING OF SERVICE



A bridge between prior and current service makes the prior service count for determining annual vacation and service awards.

The Company provides eligible employees a bridge between prior and current service. "Bridging of service" means adding a period of previous Company employment to a current period of employment so that an employee's adjusted service date takes into account the earlier employment. After bridging of service, an employee's eligibility for some Company benefits and perks with a length of service element (such as total annual vacation accrual) will be determined based on the adjusted service date. This bridging of service policy does **not** apply to the Company's retirement plans (which have their own rules for bridging of service), and bridging of service does **not** change union seniority unless stated in the applicable collective bargaining agreement.

## APPLICATION TO RESIGNING EMPLOYEES

Regular employees who voluntarily leave the Company and return as a Regular employee within 30 calendar days will receive immediate bridging of service. Regular employees who voluntarily leave the Company and return as a Regular employee beyond 30 calendar days will receive bridging of service once they have completed five more continuous years of employment, but only if they had completed at least five continuous years of employment before separating (the "5/5 Rule").

## APPLICATION TO INVOLUNTARILY TERMINATED EMPLOYEES

Regular employees who are laid off or are terminated because they are unable to return from medical leave and later return as a Regular employee within 12 months of separation will receive immediate bridging of service with the time away counted toward service. Such employees who return beyond 12 months are eligible for bridging of service under the 5/5 Rule. Employees who are involuntarily terminated for any other reason are not eligible for bridging of service.

## EXCEPTIONS

Any exception to this policy must be reviewed and approved in advance by the senior vice president of Human Resources responsible for Employee Relations.

# LEGAL RIGHTS UNDER THE FMLA



This policy outlines the primary provisions of the Family Medical Leave Act (FMLA).

The Family Medical Leave Act (FMLA) provides eligible employees up to 12 weeks of unpaid, job-protected leave in certain circumstances. The primary provisions of the FMLA are outlined in this policy.

The Company's policies in this "Time Off and Accommodations" section may be more instructive to employees than the specific provisions of the FMLA, as these policies generally provide more expansive leave benefits than what is minimally required under the FMLA. For example, the Company provides longer periods of leave in many instances; allows employees to take leave to care for family members not covered by the FMLA (domestic partners, grandparents, siblings); offers expanded leave eligibility for part-time employees; and provides leave to new employees without the FMLA's one-year waiting period.

Importantly, the Company will always provide employees at least the leave they are legally entitled to under the FMLA and any related laws of their state of residence. Leaves provided under Company policies run at the same time as any leave provided by law under the FMLA.

**The FMLA provides** that employees may take up to 12 weeks of unpaid leave (at one time or intermittently) within a 12-month period for any of the following reasons:

- incapacity related to pregnancy or child birth;
- to care for the employee's child after birth or placement for adoption or foster care;

- to care for the employee's spouse (including same-sex spouse), child or parent, who has a serious health condition;
- a serious health condition that makes the employee unable to work; or
- to address certain needs when a family member is called to active military duty.

The FMLA also allows employees to take up to 26 weeks of unpaid leave within a 12-month period to care for certain family servicemembers with a serious injury or illness.

Employees are eligible for leave under the FMLA after they have worked at least 12 months and have worked at least 1250 hours during the 12 months preceding the leave, and if they work at a location with 50 or more employees within a 75-mile radius. Employees can contact Leave Administration through [D Tools HR](#) if they have questions about eligibility.

Employees must provide 30 days' advance notice of the need to take FMLA leave when the need is foreseeable. If 30 days' notice is not possible, they must provide notice as soon as practicable. Employees must provide sufficient information so the Company can determine if the leave qualifies for FMLA protection and the anticipated timing and duration of the leave.

Company health care coverage continues during an FMLA leave, subject to employee payment of applicable

# LEGAL RIGHTS UNDER THE FMLA

(CONT.)



contributions to premiums. Employees returning from FMLA leave are entitled to reinstatement to their original position or to an equivalent position with equivalent pay, benefits, and other terms and conditions of employment, unless their position is no longer available for reasons unrelated to the leave.

The FMLA prohibits the Company from interfering with employees' exercise of FMLA rights, or from discriminating against or terminating someone for opposing practices the FMLA makes unlawful or being involved in any FMLA-related proceeding.

An employee may enforce FMLA rights by filing a complaint with the U.S. Department of Labor or a private lawsuit. The FMLA does not affect any federal or state discrimination laws, or supersede any state or local law or collective bargaining agreement providing greater leave rights.

# FAMILY CARE LEAVE



The Company offers eligible employees time off from work to care for family members during times of need.

The Company recognizes the importance of giving employees time off from work to care for their family members during times of need.

## ELIGIBILITY

Regular and Project/Supplemental employees (and others if required by law) are eligible for this benefit upon hire. The eligibility of employees subject to a collective bargaining agreement is determined by the terms of that agreement. Employees must provide a medical certification from the family member's Health Care Provider supporting their need for leave to care for that family member and the estimated length of their leave.

Employees should contact Leave Administration through [DTools HR](#) for any questions regarding family care leaves.

## DURATION

Eligible employees may take up to 12 weeks of time off from work during a 12-month period (or more where provided by local law) to tend to their family members' serious health conditions. Employees may take this leave all at once, or intermittently. Employees should request family care leave at least thirty days before the start of their leave, or as soon as practicable.

## COMPENSATION

Employees may be eligible to receive compensation from their state of residence. In addition, unless the employee elects otherwise, the Company will apply an employee's available paid time off to provide compensation during a family care leave, in combination with any state benefit not to exceed an employee's base pay.

## BENEFITS

Employees should contact their benefits team (accessible from [DTools HR](#)) to understand benefits continuation during a family care leave.

## RETURN TO WORK

Employees returning from family care leave will be reinstated to the same or similar position they held prior to the leave, unless the position is no longer available for reasons unrelated to the leave.

# MEDICAL LEAVE



The Company offers medical leaves of absence to employees who need extended time off due to illness or injury.

The Company recognizes that an employee's illness or injury may sometimes require a prolonged absence from work and offers medical leaves of absence to address those situations.

## ELIGIBILITY

All employees are eligible upon hire to request a medical leave of absence. Employees who are absent for longer than five consecutive work days, or who require intermittent medical leave, must provide documentation from their Health Care Provider confirming they are unable to work for medical reasons and providing the expected duration of the illness or injury.

The Company may require an employee seeking a medical leave to be examined, at the Company's expense, by a Health Care Provider of the Company's choosing.

Employees should contact Leave Administration through [D Tools HR](#) for any questions regarding medical leaves.

## DURATION

Approved medical leaves may last for up to 12 consecutive months, or if the leave is taken in shorter periods, for up to 15 months during a 24-month period.

Employees must notify their manager and Leave Administration as soon as they learn that they need a medical leave.

Employees requesting an extension of an approved medical leave must provide documentation from their Health Care

Provider supporting their need for additional time off. Leave extension requests must be made timely to enable proper consideration and approval before the end of the previously-approved leave period. Employees who remain away from work without obtaining a timely extension of their leave will be considered to be on an unauthorized leave and are subject to termination.

## COMPENSATION

Employees may be eligible for compensation during all or a portion of their medical leave. For example, employees may be entitled to use the Company's Short Term Illness or Short Term Disability benefit and/or receive compensation from their state of residence, not to exceed an employee's base pay.

Employees are required to use available sick time for the first five work days they are absent due to illness or injury prior to beginning a medical leave. Employees may elect to use additional available sick time for other unpaid portions of a medical leave. In addition, unless the employee elects otherwise, the Company will apply an employee's other available paid time off to provide compensation during a medical leave.

## BENEFITS

Company health care coverage generally continues during a medical leave, subject to employee payment of applicable

# MEDICAL LEAVE

(CONT.)



contributions to premiums. Employees should contact their benefits team (accessible from [D Tools HR](#)) to understand benefits continuation during a medical leave.

## RETURN TO WORK

Employees returning from medical leave under this policy will be reinstated to the same or similar position they held prior to their leave, unless the position is no longer available for reasons unrelated to the leave. As soon as practicable prior to their return, employees must provide Leave Administration with documentation from their Health Service Provider stating that they are able to return to work, with or without restrictions. If an employee is returning to work with restrictions, the Company will refer the matter to HR/Employee Relations (or Ability Management for Parks and Resorts employees) to discuss the restrictions and any requested accommodations. See the [Disability Accommodation](#) policy.

Employees who are nearing 12 months of consecutive leave (or 15 months of intermittent leave) should contact Leave Administration to discuss their ability to return to work and their timeframe for returning. If additional leave is requested, the Company will refer the matter to HR/Employee Relations, who will consider the employee's expected timeframe for being able to return to work, the needs of the business and any legal requirements. The Company will not grant requests for indefinite leave.

An employee's failure to return from a medical leave after being released by a Health Care Provider will result in termination of employment.

# MEDICAL LEAVE FOR PREGNANCY OR CHILDBIRTH



The Company offers time off to employees for medical conditions related to pregnancy or childbirth.

Employees may request time off from the Company for their medical conditions related to pregnancy or childbirth. This leave is in addition to leave available under the [Child Bonding Leave](#) policy.

## ELIGIBILITY

Employees are eligible upon hire to request a medical leave for pregnancy or childbirth. Employees should contact Leave Administration through [D Tools HR](#) for any questions regarding this type of leave.

## DURATION

Employees are entitled to leave for their medical conditions related to pregnancy or childbirth for a period not to exceed the maximum time available under the Company's [Medical Leave](#) policy.

Employees must provide a certification from their Health Care Provider supporting their need for leave and the estimated length of their leave.

Employees should request leave for their medical conditions related to pregnancy or childbirth at least 30 days before the start of their leave, or as soon as practicable.

## COMPENSATION

Employees may be eligible for compensation during all or a portion of their medical leave for pregnancy or childbirth. For example, employees may be entitled to use the Company's

Short Term Illness or Short Term Disability benefit, and/or receive compensation from the state, not to exceed an employee's base pay.

For additional information about compensation, refer to the [Medical Leave](#) policy.

## BENEFITS

Company health care coverage generally continues during a medical leave, subject to employee payment of applicable contributions to premiums. Employees should contact their benefits team (accessible from [D Tools HR](#)) to understand benefits continuation during a medical leave.

## RETURN TO WORK

Employees returning from leave for their medical conditions related to pregnancy and childbirth are entitled to reinstatement to the position they held prior to the leave, unless the position is no longer available for reasons unrelated to the leave.

See also the [Medical Leave](#), [Child Bonding Leave](#), [Disability Accommodation](#), and [Breaks for Nursing Mothers](#) policies.

# CHILD BONDING LEAVE



The Company offers eligible employees who are new parents time off (in some cases with pay) to bond with their child.

The Company recognizes the importance of giving new parents time to bond with their children. Eligible employees will receive time off in connection with the birth of their child, or the temporary custody, adoption or foster care placement of a child with them. This leave is in addition to other leaves available under policies in this Manual.

## ELIGIBILITY

Regular and Project/Supplemental employees (and others if required by law) are eligible for this benefit upon hire. The eligibility of employees subject to a collective bargaining agreement is determined by the terms of that agreement.

Employees should contact Leave Administration through [D Tools HR](#) for any questions regarding child bonding leaves.

## DURATION

Eligible employees may take up to 12 weeks of time off from work during the first 12 months from the arrival of the employee's child. Employees may take this leave all at once, or intermittently in increments of one week or greater. By law, employees in California may take leave in smaller increments twice during their total leave period. Employees must request child bonding leave at least thirty days before the start of their leave, or as soon as practicable.

In rare cases, state laws provide longer periods of time off. For information about specific laws, contact Leave Administration.

## COMPENSATION

The Company will provide 100% of Regular and Project/Supplemental employees' base pay for up to three calendar weeks of the child bonding leave for children born or placed in the home during employment. Eligibility for compensation of employees subject to a collective bargaining agreement is determined by the terms of that agreement.

Employees may also be eligible to receive compensation from their state of residence. In addition, unless the employee elects otherwise, the Company will apply an employee's available paid time off to provide compensation during any unpaid portion of a child bonding leave, in combination with any state benefit not to exceed an employee's base pay.

## BENEFITS

Employees should contact their benefits team (accessible from [D Tools HR](#)) to understand benefits continuation during a child bonding leave.

## RETURN TO WORK

Employees returning from child bonding leave will be reinstated to the same or similar position they held prior to the leave, unless the position is no longer available for reasons unrelated to the leave.



# MILITARY-RELATED LEAVES



The Company provides military-related leaves of absence to support employees and their family members who serve in the military.

The Company supports employees and their family members who serve in the military and provides military-related leaves of absence consistent with applicable law.

## LEAVES FOR EMPLOYEES WHO ARE SERVICE MEMBERS ("MILITARY LOA")

Employees who are members of the uniformed services, including the Reserves and National Guard, are eligible for leaves of absence to take part in a variety of military duties, including training, active military service, examinations to determine fitness for active duty and the performance of funeral honors duty. Subject to certain exceptions provided by law, employees may take up to five years of cumulative leave under this policy.

Employees who need to take a Military LOA should provide advance notice to their manager whenever possible.

Employees may be requested to provide a copy of their military orders in connection with a Military LOA request.

Employees should contact Leave Administration through [DTools HR](#) for any questions regarding a Military LOA.

## MILITARY LOA COMPENSATION AND BENEFITS

The Company will supplement the military pay of Regular employees up to the amount of their regular pay for the following periods:

- **Salaried employees:** up to one year
- **Hourly employees:** up to 90 calendar days

Eligibility for compensation of employees subject to a collective bargaining agreement is determined by the terms of that agreement. To enable accurate payments, employees should contact Global HR Operations through [DTools HR](#) to provide information concerning their military pay.

Company health care coverage generally continues during a Military LOA, subject to employee payment of applicable contributions to premiums. Employees should contact their benefits team (accessible from [DTools HR](#)) to understand benefits continuation during a Military LOA.

## MILITARY LOA RETURN TO WORK

The Company will comply with applicable law regarding re-employment of employees returning from a Military LOA.

## LEAVES FOR EMPLOYEES WHOSE FAMILY MEMBERS SERVE

The Company also provides leaves of absence to employees in connection with a family member's military service in the following situations. Employees should contact Leave Administration through [DTools HR](#) for any questions regarding these leaves.

## MILITARY CAREGIVER LEAVE

If an employee's spouse, domestic partner, child, parent, or "next of kin" incurs a serious illness or injury while serving on active military duty in the uniformed services, Reserves or

# MILITARY-RELATED LEAVES

(CONT.)



National Guard, the Company provides the employee up to 26 weeks of unpaid leave to care for that family member.

Employees should request military caregiver leave at least thirty days before the start of their leave, or as soon as practicable. See the [Family Care Leave](#) policy for additional information related to compensation, benefits and return to work. Military caregiver leave beyond 14 weeks in a 12-month period counts against an employee's available time for Family Care leave.

## QUALIFYING EXIGENCY LEAVE

If an employee's spouse, domestic partner, child or parent is a member of the uniformed services, Reserves or National Guard who is on or called to active duty in a foreign country, the Company will provide the employee up to 12 weeks of unpaid leave to address certain urgent, non-medical needs related to the service or call-up, including:

- Managing issues raised by short-notice deployment (i.e., deployment on seven or fewer days' notice)
- Attending military events and related activities
- Childcare and school activities
- Care for the military member's parent who is not capable of self-care
- Making or updating financial and legal arrangements to address the family member's absence
- Attending non-medical counseling

- Spending time (up to five days) with a family member who is on short-term temporary rest and recuperation leave during deployment
- Attending to certain post-deployment activities, including attending arrival ceremonies, reintegration briefings and events, and other official ceremonies

Employees should provide notice of the need for qualifying exigency leave as soon as practicable. Employees may be requested to provide a copy of their family member's military orders in connection with a qualifying exigency leave request. See the [Family Care Leave](#) policy for additional information related to compensation, benefits and return to work. Periods of qualifying exigency leave count against an employee's available time for Family Care leave.

# BEREAVEMENT LEAVE



The Company provides eligible employees time off in connection with the death of a family member.

The Company provides eligible employees time off in connection with the death of a family member.

## ELIGIBILITY

Regular and Project/Supplemental employees are eligible for this benefit upon hire. The eligibility of employees subject to a collective bargaining agreement is determined by the terms of that agreement.

## TIME ALLOWED

Eligible employees may take paid bereavement leave for up to five work days (whether or not consecutive) in connection with the death of a family member. If additional time off is needed, employees should talk with their manager about available options.

## APPROVAL

Employees needing bereavement leave should request approval from their manager.

## COMPENSATION

Bereavement leave will be paid at the employee's regular rate of pay for the number of hours they were scheduled to work on the day(s) of the leave. If an employee takes time off for bereavement leave and also works for the Company on a particular work day, the Company will pay the employee for their work time and for bereavement leave, up to the number of hours they were scheduled to work that day.

## RECORDING TIME

Employees must accurately record any absences from work due to bereavement leave.

# PERSONAL LEAVE



Employees may request a personal leave of absence to take time off from work for reasons that are not covered by other leave policies.

The Company recognizes that employees sometimes may need to take an extended time off from work for reasons that are not covered by other leave policies and they have no available vacation/PTO. Therefore, the Company offers employees the opportunity to request a personal leave, which may be granted in the Company's sole discretion.

## ELIGIBILITY

All employees are eligible upon hire to request a personal leave. Employees should contact Leave Administration through [D Tools HR](#) for any questions regarding personal leaves.

## APPROVAL PROCESS

Personal leaves typically will be limited to 30 days and require the written approval of the employee's manager and Human Resources. In special circumstances, leaves greater than 30 days may be considered. These extended leave requests require the written approval of the employee's manager, Department Head and HR/Employee Relations.

## COMPENSATION

Personal leaves are unpaid.

## BENEFITS

Employees should contact their benefits team (accessible from [D Tools HR](#)) to understand benefits continuation during a personal leave.

# HOLIDAYS



The Company provides paid holidays to eligible employees.

The Company provides paid holidays to eligible employees.

## ELIGIBILITY

Employees are eligible for named and floating holidays as follows:

- **Named holidays** - Regular and Project/Supplemental salaried employees are eligible for named holidays immediately upon hire. Regular and Project/Supplemental full-time hourly employees are eligible for named holidays after a 30-day waiting period.
- **Floating holidays** - Regular full-time employees are eligible for floating holidays. New employees hired on or after October 1 are not eligible for floating holidays until the next calendar year.

The eligibility of employees subject to a collective bargaining agreement is determined by the terms of that agreement.

Holiday schedules—and how the total number of holidays is distributed between named and floating holidays—vary by location based on business needs. Employees can find information about their particular holiday schedule in [D Tools HR](#).

## USE OF FLOATING HOLIDAYS

Employees should obtain approval from their manager before using floating holidays and must properly record any day they are absent from work due to floating holidays.

Unused floating holidays carry over into the next calendar year, but an employee's total available floating holidays is "capped" at the annual allotment. Accordingly, at the beginning of each calendar year, an employee is allotted the number of floating holidays that bring the employee's total to their annual allotment. For example, if an employee with a yearly allotment of two floating holidays uses one and carries over one, they will receive one more floating holiday on January 1.

## RULES FOR HOLIDAY PAY

Eligible hourly and salaried non-exempt employees who do not work on a paid holiday will receive holiday pay at their regular hourly rate for the number of hours in their regularly-scheduled shift.

Eligible hourly and salaried non-exempt employees who are required to work on a paid holiday will receive holiday pay plus pay at their regular hourly rate for all hours worked. Employees who do not work a scheduled holiday shift are not eligible for holiday pay.

If a paid holiday occurs during an employee's scheduled vacation or PTO, the day on which the holiday falls will not be counted as vacation or PTO.

# VACATION



The Company believes that time off from work is important to the health and well-being of employees and helps people recharge and rejuvenate themselves.

The Company believes that time off from work is important to the health and well-being of employees and helps people recharge and rejuvenate themselves. The Company provides paid vacation time to eligible employees and encourages employees to use their accrued vacation days.

## ELIGIBILITY

Regular full-time employees are eligible for between two and five weeks of paid vacation time each year, based on job level and years of service. The eligibility of employees subject to a collective bargaining agreement is determined by the terms of that agreement.

## ACCRUAL AND USE

Eligible employees accrue vacation time based on the number of hours recorded. Employees may not use vacation before it is accrued. Employees can find information about their available vacation by selecting the “View Available Time Off” quick link in [D Tools HR](#).

Unused vacation is carried over from year to year, but vacation accrual is subject to a cap, based on job level and years of service. Employees who reach the cap will stop accruing additional vacation until they use some of their existing vacation. Employees can find information on their annual vacation accrual and cap in [D Tools HR](#).

Employees do not accrue vacation during a leave of absence.

Employees should obtain approval from their manager before using vacation. Employees must accurately record their use of vacation.

Upon termination of employment, employees will be paid a lump sum for any available vacation at the regular rate of pay then in effect. Employees may not extend their employment after termination by using available vacation.

## VACATION DONATION

Employees may donate accrued vacation to other employees who have extenuating circumstances, such as an extended illness or family member illness, and who have exhausted their vacation, PTO and/or sick time. Employees can find information about donating vacation in [D Tools HR](#).

# CARE TIME



Employees eligible for paid sick time may use it to care for themselves or a family member, or in other specified circumstances.

The Company provides paid sick time to eligible employees. In addition to using this benefit for their own illness or injury, employees may use paid sick time to care for a family member, or in other specified circumstances.

## ELIGIBILITY

Regular full-time employees not subject to a collective bargaining agreement (and others if required by law) are eligible for sick time benefits.

## RULES FOR ALL ELIGIBLE EMPLOYEES

Eligible employees may use sick time to receive pay when they are absent from work due to:

- The employee's own illness or injury
- The illness or injury of an employee's family member
- An employee or family member's well-care or doctor's visits
- An employee's status as the victim of a crime, such as domestic violence, sexual assault or stalking
- The closure of a facility for health/safety purposes
- Reasons otherwise required by local law

Employees must accurately record their use of sick time.

If the Company determines that an employee is abusing this benefit, it may decline to provide the benefit and/or may discipline the employee.

## RULES FOR ELIGIBLE SALARIED EMPLOYEES

Employees who are paid on a salary basis receive 80 hours of sick time immediately upon hire. Unused sick time does not

carry over from year to year or get paid out upon termination. Employees start each new calendar year with 80 hours of sick time.

## RULES FOR ELIGIBLE HOURLY EMPLOYEES

Newly hired, hourly employees become eligible to use sick time after a 90-day waiting period (unless a shorter waiting period is required by applicable local law). Employees accrue sick time at a rate determined by location, up to a maximum of 80 hours per year (except employees located in Anaheim, Hawaii, Hilton Head, and Orlando, who accrue a maximum of 56 hours per year).

Accrued unused sick time carries over from year to year, up to a cap of 240 hours. Upon reaching the cap, employees will not accrue additional sick time until they use some of their existing sick time. Twice yearly, employees will have the opportunity to receive a buyout of available sick time over 120 hours, which will be paid in a lump sum at the employee's regular rate of pay then in effect. Unused sick time will be paid out upon termination.

## LOCATIONS WITH SPECIFIC SICK PAY RULES

The Company also follows the specific sick pay rules of certain states and municipalities, including those prohibiting retaliation in connection with sick time requests and use, and those allowing civil actions to enforce sick time benefits. Employees who are interested in more information regarding their local sick pay rules should contact Global HR Operations.

# PAID TIME OFF (PTO)



The Company believes that time off from work is important to the health and well-being of employees and helps people recharge and rejuvenate themselves.

The Company believes that time off from work is important to the health and well-being of employees and helps people recharge and rejuvenate themselves. The Company offers Paid Time Off (“PTO”) to eligible employees, which can be used for vacation, sick leave or personal reasons.

## ELIGIBILITY

The following employee classifications are eligible for PTO upon hire:

- Regular part-time salaried exempt employees
- Project/Supplemental part-time salaried exempt employees
- Project/Supplemental full-time employees

## ACCRUAL AND USE

Eligible employees accrue PTO based on the number of hours recorded. Employees may not use PTO before it is accrued. Employees can find information about their available PTO by selecting the “View Available Time Off” quick link in [D Tools HR](#).

Unused PTO is carried over from year to year, but PTO accrual is subject to a cap based on job classification, job level and/or years of service. Employees who reach the cap will stop accruing additional PTO until they use some of their existing PTO. Employees can find information on their annual PTO accrual and cap in [D Tools HR](#).

Employees do not accrue PTO during a leave of absence.

Employees should obtain approval from their manager before using PTO, where practicable. Employees must accurately record their use of PTO.

Upon termination of employment, employees will be paid a lump sum for any available PTO at the regular rate of pay then in effect. Employees may not extend their employment after termination by using available PTO.

## PTO DONATION

Employees may donate accrued PTO to other employees who have extenuating circumstances, such as an extended illness or family member illness, and who have exhausted their vacation, PTO and/or sick time. Employees can find information about donating PTO in [D Tools HR](#).



# TIME OFF FOR CIVIC RESPONSIBILITIES



The Company supports employees in the fulfillment of their civic responsibilities by providing paid time off to serve on a jury or when needed to vote.

The Company supports employees in the fulfillment of their civic responsibilities by providing paid time off to serve on a jury or when needed to vote in general and statewide elections.

## JURY SERVICE

Employees who receive a notice for jury service should promptly inform their manager of the date and time of the requested service and discuss any relevant scheduling issues.

During the period of jury service, employees must report to work as usual if they are not required to be in court on a particular work day. Employees should discuss with their manager any other expectations during the period of jury service, including whether they need to report to work on partial days of jury service.

## COMPENSATION

Regular and Project/Supplemental employees will be paid up to a maximum of 20 work days in any consecutive 12 months when serving on a jury on what otherwise would be a work day. Eligibility for compensation of employees subject to a collective bargaining agreement is determined by the terms of that agreement. Employees who are required to serve on a jury beyond these limits should contact HR/Employee Relations to request an exception to the limits. Employees other than Regular or Project/Supplemental employees will be compensated during jury service if required by law.

Jury duty will be paid at the employee's regular rate of pay for the number of hours they were scheduled to work on the day(s) of jury duty. If an employee takes time off for jury duty and also works for the Company on a particular work day, the Company will pay the employee for their work time and for jury duty, up to the number of hours they were scheduled to work that day.

## RECORDING TIME

Employees must accurately record any absences from work due to jury service.

## VOTING

If employees will not have sufficient time outside of their regular working hours to vote in a general or statewide election, they should notify their manager of their need for time off at least two working days before the election, if possible. Upon approval, employees may take up to two hours off work for voting, either at the beginning or end of their regular work shift, without loss of pay. If additional time is needed to vote, it will be unpaid.

# INVOLVEMENT IN COMPANY LEGAL MATTERS



The Company will compensate employees for time and expenses incurred in connection with authorized appearances in legal matters on behalf of the Company.

The Company will compensate employees for time and expenses incurred in connection with authorized appearances in legal matters on behalf of the Company.

## RESPONSIBILITY

Employees who receive a subpoena or are otherwise requested to appear in court or for a deposition in connection with a Company legal matter must contact the Legal Department immediately. Copies of the documents should be sent to the Corporate Legal Litigation Department, mail code 1494. (External address: The Walt Disney Company, Litigation Department, 500 S. Buena Vista Street, Burbank, California 91521-1494). Activities not coordinated with the Legal Department will be considered unauthorized and are not subject to compensation.

## WORK SCHEDULE

Employees generally are expected to work an appropriate portion of their regularly-scheduled shift before and/or after their participation in the legal matter. Coordination and exceptions regarding this expectation require approval of an employee's manager.

## COMPENSATION

Hourly and salaried non-exempt employees will be paid their regular straight-time or overtime rate, as applicable, for hours spent in connection with an authorized legal appearance. Employees will be reimbursed for any reasonable expenses related to the appearance, consistent with the Company's [Travel and Entertainment policy](#).

# DISABILITY ACCOMMODATION



Employees seeking an accommodation should contact Employee Relations or Ability Management.

The Company provides reasonable accommodation to employees with disabilities.

## REASONABLE ACCOMMODATION

In keeping with the Company's [Equal Employment Opportunity](#) policy, the Company will accommodate an employee's known physical or mental disability when it determines an accommodation is reasonable and will enable the employee to perform the essential functions of his or her position. Exceptions may be made where an accommodation would create an undue hardship for the Company, or where otherwise consistent with law.

## REQUESTING AN ACCOMMODATION

Employees who need an accommodation for a physical or mental condition that is interfering with job performance (including pregnant employees seeking accommodations for reasons related to pregnancy and childbirth) should promptly notify HR/Employee Relations. Parks and Resorts employees should use the request form(s) available in [D Tools HR](#). Although accommodations are determined on a case-by-case basis, generally the Company will require information from the employee's Health Care Provider confirming the existence and anticipated duration of the disabling condition and identifying limitations caused by the condition. Typically, the Company and employee will engage in an interactive process to assess how the condition limits the employee in the workplace, and

to identify what accommodations, if any, are feasible. The employee has an obligation to cooperate with the Company in this process.

## OTHER WORKPLACE ACCOMMODATIONS

Even where not required by law, the Company will consider other employee requests for workplace accommodations, including requests related to a temporary injury or requests to address ergonomic needs.

## LEAVES OF ABSENCE

Employees requesting a leave of absence as a reasonable accommodation should refer to the [Medical Leave](#) policy.

# RELIGIOUS ACCOMMODATION



Employees seeking a religious accommodation should contact Employee Relations.

The Company respects the religious diversity of its employees and prohibits discrimination based on religion.

In keeping with these principles, the Company provides, on request, reasonable accommodations for employees to exercise their sincerely-held religious beliefs, unless doing so would create an undue hardship for the Company.

## REQUESTING AN ACCOMMODATION

Employees whose sincerely-held religious beliefs, practices or observances conflict with work requirements should notify HR/Employee Relations. Parks and Resorts employees should use the Religious Accommodation Request form that is available on The Hub. An accommodation request may trigger an interactive process to assess the employee's specific individual needs, and to identify what accommodations, if any, are feasible. The employee has an obligation to cooperate with the Company in this process.

# BREAKS FOR NURSING MOTHERS



The Company accommodates nursing mothers at work.

The Company fosters a work environment that supports family life. As part of those efforts, the Company accommodates nursing mothers who wish to express breast milk during their workday.

## LOCATION AND TIMING

Employees who request breaks under this policy will be provided the use of a private space for this purpose. This area may be the place where the employee normally works if there is adequate privacy. Employees are responsible for proper storage of their expressed milk.

Hourly and non-exempt salaried employees are encouraged to use their regular scheduled lunch or break times, if possible. Any additional time required should be scheduled between the employee and her manager based on the employee's work schedule and business needs.

## REQUESTS FOR NURSING BREAKS

Employees should make requests under this policy to their manager or Human Resources.

# EMPLOYEE HEALTH AND SAFETY AND ACCIDENT PREVENTION



The Company strives to provide a safe work environment for all employees and complies with all applicable health and safety laws and regulations.

The health and safety of our employees is paramount. The Company strives to provide a safe work environment for all employees and complies with all applicable health and safety laws and regulations. Ensuring a safe work environment requires everyone's assistance and vigilance.

## EMPLOYEE RESPONSIBILITY – "SAFETY BEGINS WITH ME"

The Company relies on its employees to contribute to a safe work environment. Employees should adopt a "safety begins with me" approach in the workplace. Employees should comply with all applicable health and safety procedures and use necessary protective equipment and safety devices when required to do so in the workplace.

Employees should notify their manager or other appropriate manager promptly about any potential unsafe conditions or safety hazards. Employees may also contact the Safety Department at 818-560-1726. Concerns may be reported anonymously. Employees will not be penalized in any way for reporting unsafe conditions and/or practices.

Employees should report all accidents, no matter how minor, promptly to their manager, Human Resources, Medical Department or Security. If a life-threatening or emergency situation exists, employees should call 911 and seek appropriate medical attention, and then follow up with their manager as soon as possible.

## VEHICLE SAFETY

Employees are expected to observe safe driving practices while operating a vehicle in the performance of their jobs (whether the vehicle is provided by the Company or is personally owned), which includes only making telephone calls or sending messages if it can be accomplished without taking one's hands from the wheel or focus from the road. Employees must comply with any additional segment guidelines or applicable laws that impose greater restrictions on the use of communications devices while operating a vehicle.

## WORK-RELATED ILLNESS OR INJURY

Employees must promptly report to their manager any injury or illness that occurs on the job or arises in the course of their duties. For certain injuries or illnesses, employees may be eligible to receive workers' compensation benefits under applicable state law. The employee and manager are responsible for promptly reporting work-related illnesses or injuries to the Medical Department or Risk Management Department for their location.

# EMPLOYEE SECURITY



Employees should report any security concerns to their local security team or to Global Security at 1-818-560-3220.

The safety and security of the Company's employees is vitally important. Employees should promptly report any security concerns, including suspicious activity, to their local security team or to Global Security at 1-818-560-3220. In other words, "See Something, Say Something."

## WORKPLACE VIOLENCE

Employees may not commit or threaten any act of violence, or harass, intimidate or coerce any employee, guest or other person in the course of the Company's business. The Company will promptly respond to any known acts or threats of workplace violence. All such acts and threats will be taken seriously and are grounds for disciplinary action, which may be termination.

Possessing a firearm or other dangerous weapon on Company premises (including remote production locations), at Company events, or wherever employees perform work for the Company, is strictly prohibited unless authorized as part of the employee's work.

Employees who have obtained an active restraining or protective order should feel free to consult with Global Security about the matter. This information would be used to help make a plan to increase workplace safety.

In the event of a workplace violence incident or a threat to commit **immediate** bodily harm to another person, employees should call 911 from an outside line (U.S. only). Employees who become aware of a **non-immediate** threat

in the workplace should contact Security, Human Resources, their manager or the Guideline. Managers receiving any such reports must immediately contact Security or Human Resources.

## COMPANY IDENTIFICATION CARDS

While on Company premises, employees, contractors and visitors must wear their Employee Identification card ("ID") or visitor access badge where it is clearly visible, unless their role requires otherwise. Employees may not give their ID to another person to use and may not use another person's ID. Employees should immediately notify Security if their ID card is lost or stolen so that access can be shut down.

## PERSONAL PROPERTY

For the safety of our employees and guests, any vehicles on Company premises are subject to search.

Employees are discouraged from bringing valuable personal property onto Company premises. The Company is not responsible for loss or theft of employees' personal property. While on Company premises, employees are expected to consent to the Company's request to search personal property (such as purses, briefcases and packages), when the Company reasonably believes the search will assist in the investigation of safety or security concerns or work-related misconduct.

Certain areas of Company property are subject to video monitoring.

# DRUGS AND ALCOHOL



Employees may not be under the influence of drugs or alcohol while working.

The Company is committed to providing a safe and productive work environment and prohibits employees from being under the influence of drugs or alcohol while working.

Employees must not report to or remain at work, or otherwise perform work for the Company, while under the influence of alcohol or drugs. The unlawful manufacture, distribution, dispensation, possession or use of drugs is prohibited in the workplace, including on Company property, in any Company-owned, leased or rented vehicle, or while engaged in Company business. Violators will be subject to disciplinary action, which may be termination.

Employees who are lawfully using prescription or over-the-counter drugs that they believe may impair their ability to safely perform their job should discuss the issue with HR/Employee Relations (or Health Services for Parks and Resorts employees) before starting or resuming work.



# NON-SMOKING POLICY



Smoking is prohibited, except in specifically-designated and posted “Smoking Areas.”

As part of a broader strategy to improve employee health, it is the policy of the Company to limit exposure to secondhand smoke for its employees, Cast Members, clients, contractors, visitors and guests, all of whom are required to comply with this policy.

Smoking in any form, including the use of tobacco products (pipes, cigars and cigarettes) or “vaping” with e-cigarettes, shall only be permitted in areas specifically designated and posted as “Smoking Areas.” Those who smoke must use the provided receptacles in order to maintain Company facilities. Seating in “Smoking Areas” shall be provided, if needed and requested.

In any area smoking is prohibited by law, it is also prohibited by Company policy (e.g., adjacent to fuel storage and flammable/combustible liquid dispensing activities).

Smoking is prohibited at all times in shuttles, carpool vans and any other multiple-occupant, Company-owned vehicle.

Smoking is prohibited inside any indoor facilities owned or leased by the Company.

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