CAA GEC Program

CODE OF ETHICS & BUSINESS CONDUCT

A MESSAGE FROM OUR CEO

CAA's business depends upon our reputation for integrity. And our reputation for integrity depends upon every single employee.

Our Code of Ethics and Business Conduct, as part of our larger compliance program, is our commitment to each other that we will carry out business with the highest professional and ethical standards, as well as comply with all applicable laws. CAA's business, our industries and the world are subject to constant change; the Code's principles provide steadfast guidance.

We act responsibly and ethically in all of our professional dealings. We report suspected misconduct promptly and we do not tolerate retaliation in any form towards someone making a good faith report. **We treat our colleagues with fairness and respect in a safe work environment. We act in the best interests of our clients and company.**

Please take the time to review the Code and to do so regularly.

Thank you for upholding CAA's values.

CAA
Bryan Lourd

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THE GLOBAL ETHICS & COMPLIANCE PROGRAM

Our Code is the cornerstone of our Global Ethics & Compliance Program. It is a frame of reference for ethical conduct and a resource that you should refer to when you have questions. The Code is not meant to cover all possible situations that may occur. And, in many instances, the policies referenced in the Code go beyond the requirements of the law. In some instances, you may need additional information and guidance. You can find information on specific topics in our policies and the CAA Handbook. Links to these are referenced throughout the Code.

You can also contact the Global Ethics & Compliance team at **compliance@caa.com**

IT IS ULTIMATELY YOUR RESPONSIBILITY TO DO THE RIGHT THING – A RESPONSIBILITY THAT CANNOT BE DELEGATED.

WHO MUST FOLLOW THE CODE?

The Code applies to all CAA employees, members and equity holders, officers, and directors worldwide, including those of our subsidiaries and controlled affiliates (collectively, "Colleagues"). We also require third parties with whom we do business to act in a way that is consistent with the Code.

When you engage vendors on behalf of CAA, you must ensure that they agree to abide by our Supplier Code of Conduct.

WHAT ARE OUR RESPONSIBILITIES AS CAA COLLEAGUES?

We put our values into practice. At CAA, we each play a key role in ensuring that the Company complies with the law and operates in accordance with the highest standards of business ethics. We commit to the following:

- Be familiar with the information contained in the Code as well as those laws and CAA policies that apply to your job responsibilities;
- Comply with CAA policies and applicable laws;
- Speak up if you suspect misconduct;
- Help maintain CAA's unique culture and support the Code;
- Work as a team and treat others respectfully;
- Cooperate and tell the truth when you are asked to assist with an investigation or audit.

WHAT ARE OUR RESPONSIBILITIES AS SUPERVISORS?

As a supervisor, you have a special obligation to create a culture of business ethics and support Colleagues in understanding their compliance obligations. Supervisors must commit to the following:

- **Create an environment of business ethics.** Maintain a workplace environment in which Colleagues feel comfortable asking questions and raising concerns;
- **Support the Global Ethics & Compliance Program.** Encourage Colleagues to refer to the Code; ensure that those with whom you work are familiar with the policies that apply to their jobs; and assist in implementing the Global Ethics & Compliance Program in your area;
- **Listen and offer guidance.** Be available to Colleagues who come to you to raise concerns and ask questions. Assist Colleagues in making ethical decisions;
- **Refer issues to the appropriate department.** If you become aware of suspected misconduct, refer the matter to Global Ethics & Compliance or any of the other resources identified in this Code.

WHAT SHOULD I DO IF FACED WITH A SITUATION THAT DOESN'T FEEL RIGHT?

We are sometimes faced with difficult situations, where the right choice isn't obvious. It is at those times that our commitment to doing business with integrity matters most.

If you are faced with a situation that doesn't feel right and you are not sure what to do, ask these questions:

- Is this action lawful, and in line with the Code and CAA policies?
- Will I be proud of my decision if seen by co-workers, family, friends, or the press?
- Will this action promote CAA's values and reputation as an ethical organization?

The answer to the above questions **must** be a definite **"yes,"** - If it is not, then stop, and contact any of the resources listed in the Code.

HOW DO I SEEK GUIDANCE?

CAA has numerous resources available for you to get help when needed. If you are unsure about what the law or CAA policy requires, or you have doubts about the best course of action in a particular situation:

- speak to your supervisor or another supervisor with whom you feel comfortable;
- reach out to the Global Ethics & Compliance team (**compliance@caa.com**);
- contact your local member of the Office of the Chief Legal Officer ("OCLO"), or any of the other resources that CAA makes available.

If you become aware of suspected misconduct, refer the matter to Global Ethics & Compliance or any of the other resources identified in this Code.

If you have questions, ASK! If you aren't certain, seek guidance!

HOW DO I REPORT SUSPECTED MISCONDUCT?

SPEAK UP

If you suspect something illegal or unethical, it may seem easier to look the other way, but remember that misconduct affects all of us. When you **Speak Up**, you are protecting yourself, your colleagues, and the reputation of CAA.

If you learn about behavior that you believe violates our Code, CAA policy or the law, report it. CAA absolutely prohibits retaliation against any Colleague for reporting an issue in good faith or cooperating in an investigation.

You have several places to report suspected misconduct:

- Your supervisor or manager is often an excellent first point of contact. He or she is likely to be in the best position to understand your concern and take appropriate action.
- If you are uncomfortable speaking with your supervisor, or you have already shared a concern and believe it is not being addressed appropriately, you have other options:
  - Any other member of management
  - Global Ethics & Compliance
  - Human Resources
  - The Office of the Chief Legal Officer
  - The Ethics Helpline

REMEMBER, AN ISSUE CANNOT BE ADDRESSED UNLESS IT IS BROUGHT TO SOMEONE'S ATTENTION.

WHERE CAN I ACCESS THE ETHICS HELPLINE?

SPEAK UP

The Ethics Helpline is a valuable resource for raising concerns or seeking guidance. It is operated by an independent third party and is available 24/7, from any location around the globe. The Ethics Helpline is available in most languages and can be contacted by phone, email or on the web at **https://caa.ethicspoint.com**.

You can contact the Ethics Helpline anonymously, where permitted by law. We exercise discretion to avoid disclosing the sources of information. When you are reporting anonymously, try to provide enough specific information to enable an investigation of the issue you are reporting.

When you call the Ethics Helpline, you will receive a tracking number so that you can call back for an update on your report or to receive an answer to your question. If you are reporting information anonymously, it is important that you call back so that you can answer any additional questions.

WHAT HAPPENS AFTER A REPORT IS RECEIVED?

Reports of suspected misconduct will be appropriately investigated and treated confidentially to the extent possible in light of CAA's need to conduct an investigation and follow up on any concerns.

You should not conduct your own investigation. Investigations often involve complex legal issues, and acting on your own may compromise an investigation.

WE PROHIBIT RETALIATION

We will not permit retaliation of any kind against anyone who has reported potential misconduct in good faith or for cooperating in an investigation of suspected misconduct.

If you believe that you or someone else has been subject to retaliation, report it immediately via the Ethics Helpline and/or the Global Ethics & Compliance team.

We take claims of retaliation seriously. They will be investigated and handled appropriately.

WHAT HAPPENS WHEN VIOLATIONS OCCUR?

Violations of the Code, our policies, applicable laws, and regulations can result in profound consequences for you individually and for CAA. Subject to applicable law, violations may result in disciplinary action up to and including termination of employment. In addition, subject to applicable law, Colleagues who collaborate or participate in violations may also be subject to disciplinary measures. This includes supervisors who fail to use reasonable care to detect a violation or who direct or approve violations or "look the other way."

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Violations of applicable law may also result in legal proceedings and penalties including, in some circumstances, criminal prosecution.

WE COOPERATE WITH INVESTIGATIONS

All Colleagues are required to cooperate fully and truthfully with investigations. With respect to inquiries from regulators, we must never mislead any investigator and never alter or destroy documents or records in response to an investigation.

All requests for information, other than what is provided on a routine basis, should be reported to the Office of the Chief Legal Officer. When we are notified of an external investigation, we take prompt action to preserve documents that may be relevant.

WE COMPLY WITH THE LAW

CAA is committed to compliance with all laws, rules, and regulations that apply to our business in every country where we operate. Understanding applicable laws and regulations can sometimes be difficult. The Global Ethics & Compliance team – and many other CAA resources – can help. We must also comply with Company policies, of course, which may go beyond what is required by the law.

WE EMBRACE DIVERSITY AND RESPECT THE PERSONAL DIGNITY OF OTHERS

We are a diverse, talented, and motivated group of individuals aligned around a common set of goals. We work best when we work together as a team, treat each other with respect, and value the unique contributions of others.

CAA provides equal employment opportunity for all applicants and Colleagues. We do not discriminate on the basis of race, color, religion, creed, gender or sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), national origin, ancestry, age, physical disability, mental disability, medical condition, genetic information, family and medical care leave status, military or veteran status, marital status, family status, sexual orientation, gender identity, gender expression, or any other characteristic protected by applicable law.

WE ARE COMMITTED TO MAINTAINING A DIVERSE AND WELCOMING WORK ENVIRONMENT.

SEE THE EQUAL EMPLOYMENT OPPORTUNITY POLICY FOR MORE INFORMATION.

WE DO NOT PERMIT HARASSMENT

CAA is committed to providing the workplace that each of us deserves, free of harassment (sexual or otherwise). Harassment includes unwelcome conduct that creates an intimidating, offensive or hostile work environment. While the legal definitions of harassment may vary, the following is a list of some of the types of conduct that we at CAA consider to be unacceptable behavior:

- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility towards others because of protected characteristics, such as race, gender, or sexual orientation
- Derogatory posters, photographs, cartoons, displays, memes, GIFs, or gestures

SEE THE **ANTI-HARASSMENT AND NON-DISCRIMINATION POLICY** FOR MORE INFORMATION.

WE ETHICALLY HANDLE CONFLICTS OF INTEREST

A conflict of interest occurs when your private interests interfere, or even appear to interfere with, the interests of CAA or our clients. Conflicts of interest can make it difficult for us to perform our work objectively. At CAA, we devote our best efforts and attention to the performance of our jobs and act at all times in our clients' and CAA's best interests. We use good judgment, adhere to high ethical standards, and ethically handle any situations that create an actual or potential conflict of interest.

If a conflict of interest arises, or if you face a situation that may involve or lead to a conflict of interest, disclose the situation to your supervisor, Global Ethics & Compliance, the Human Resources Department, or the Office of the Chief Legal Officer. CAA has resources in place to help resolve the situation in a fair and transparent manner.

While it is not feasible to describe all possible conflicts of interest that could develop, some of the more common types of conflicts include the following:

- Supervising a family member or someone with whom you are having a personal relationship;
- Working directly or indirectly for a competitor, business partner, or client;
- Engaging in self-employment that is competitive with or detrimental to the Company;
- Having a direct or indirect financial interest in a competitor, client, or business partner (ownership of 5% or less of any class of securities of any entity whose securities are publicly traded is not considered a conflict);
- Using Company assets or labor for personal use;
- Accepting kickbacks or rebates from business partners and vendors;

- Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to the Company.

The receipt or giving of gifts and entertainment can also create conflicts of interest. The rules in this area are addressed below.

At CAA, we also have very important obligations to our clients to act in their best interests. You should escalate any perceived or actual conflicts of interest between or involving our clients so that we can take appropriate steps to mitigate any concerns.

WE MAKE DECISIONS THAT AFFECT CAA BASED ON THE COMPANY'S BEST INTERESTS, INDEPENDENT OF OUTSIDE INFLUENCES.

SEE THE CONFLICTS OF INTEREST POLICY FOR MORE INFORMATION.

WE ETHICALLY HANDLE CORPORATE OPPORTUNITIES

We owe a duty to CAA to advance its interests when the opportunity to do so arises. If you learn of a business or investment opportunity through your position at CAA, such as from a client or business partner, you may not participate in the opportunity without the prior written approval of the Global Ethics & Compliance team. Such an opportunity should be considered an investment opportunity for CAA in the first instance.

SEE THE CORPORATE OPPORTUNITIES POLICY FOR MORE INFORMATION.

WE COMPLY WITH THE RULES GOVERNING GIFTS AND ENTERTAINMENT

The exchange of gifts and entertainment are common business practices that can help build goodwill. However, we must be careful when exchanging business courtesies to avoid conflicts of interest or the perception that we are attempting to improperly influence business decisions.

As a general rule, we can give or accept business-related gifts or entertainment so long as doing so:

- complies with applicable laws;
- does not violate any CAA policy; and
- is consistent with accepted business practices and customs, including practice and custom in the locale where business is being conducted.

Use discretion, moderation and good judgment when providing or accepting gifts or entertainment.

Some of our vendors and clients may have gift and entertainment policies of their own. Be careful not to provide a gift or entertainment that violates another company's gift and entertainment policy.

There are strict laws that govern providing gifts, including meals, entertainment, transportation, and lodging, to government officials and Colleagues. Do not provide gifts or anything of value (including travel expenses) to government officials or employees or members of their families in connection with CAA business without obtaining prior written approval from the Global Ethics & Compliance team.

GIVING OR RECEIVING ANY PAYMENT OR GIFT IN THE NATURE OF A BRIBE OR KICKBACK IS ABSOLUTELY PROHIBITED.

SEE THE GIFTS AND PAYMENTS POLICY FOR MORE INFORMATION.

WE COMPLY WITH TRADE AND SANCTIONS LAWS

CAA does business all over the world. It is important that we know about and comply with all applicable laws and regulations, including sanctions. It is crucial that we do not inadvertently engage sanctioned individuals or entities or breach the laws governing the import or export of services, information, and technology. Familiarize yourself with the Ultra High Risk Countries list provided from time to time by the Global Ethics & Compliance team.

If you are involved in the movement of services or technology across national borders, make sure you know and comply with:

- Any national or international restrictions on doing business with certain countries or individuals;
- The trade laws and regulations associated with the countries in which you do business.

Review in advance with the Global Ethics & Compliance team or the Office of the Chief Legal Officer any proposed activity that could involve a country or individual subject to trade restrictions, including financial or trade sanctions. If you are unsure about whether there may be trade restrictions that apply to your particular transaction, always err on the side of caution, and seek clarity from CAA's legal and compliance teams.

ANTI-BOYCOTT REGULATIONS

We comply with U.S. anti-boycott laws. Do not take any action or furnish any information that could be viewed as participation in an illegal boycott. In addition, U.S. law requires us to report any suspected boycott requests to the U.S. government.

Immediately notify Global Ethics & Compliance if you suspect you have received any boycott-related request.

WE DO NOT BRIBE

We do not offer, give, request, or accept any form of bribe, payoff, or kickback. We do not offer or provide anything of value, directly or indirectly, to a government official or political candidate in order to obtain or retain business or secure any improper advantage.

We also exercise due diligence in working with third parties who may interact with governments on CAA's behalf. CAA can be liable for acts of bribery committed by third parties in connection with CAA work. If you are aware that a third party is or may be engaging in unethical or illegal activities, report the matter to the Global Ethics & Compliance team immediately. Never ignore warning signs that a third party may be engaging in illegal or unethical activities. We expect our business partners, contractors, consultants, and vendors to operate in compliance with all applicable laws.

CORRUPTION HARMS COMMUNITIES, DAMAGES REPUTATIONS AND FURTHERS INEQUALITY.

SEE THE ANTI-BRIBERY AND CORRUPTION POLICY FOR MORE INFORMATION.

WE BELIEVE IN THE IMPORTANCE OF FREE COMPETITION AND FAIR DEALING

CAA is prepared to compete successfully in today's business environment and will always do so in full compliance with applicable antitrust, competition, and fair dealing laws. Competition or antitrust laws are complex. In general, these laws prohibit arrangements with competitors that restrain trade in some way and use of market power to unfairly disadvantage competitors.

- If you find yourself in a meeting, including trade association meetings, where a questionable discussion is taking place, state that you believe the discussion is inappropriate, break away from the discussion, and promptly inform the Global Ethics & Compliance team;
- Seek competitive information from public sources, such as news stories and trade journal articles. Never engage in fraud, misrepresentation, or deception to obtain information. Never use invasive technology to "spy" on others;
- Be fair, factual, and complete in our advertising, sales, and promotional materials.

Do not enter into any agreement or understanding to:

- Fix prices or contract or delivery terms for services or products;

- Rig bids or allocate customers or markets among competitors;
- Boycott a business partner or customer.

Due to the sensitive nature of these topics, never discuss matters like price, contract terms, or marketing plans with any competitors. Even casual conversations can be considered anti-competitive, so be mindful about what you discuss with others, especially competitors.

WE NEVER TAKE UNFAIR ADVANTAGE OF OTHERS THROUGH FRAUD, MISREPRESENTATION, OR ANY OTHER UNFAIR DEALING PRACTICE.

SPEAKING ON BEHALF OF CAA

We need a clear and consistent voice when providing information to the public and the media. For this reason, it is important that only formally designated CAA personnel speak publicly on behalf of CAA. All press inquiries from the media requesting a statement or response from the Company are handled by the Corporate Communications Department.

Unless you are authorized to do so by the Corporate Communications Department, do not make any public statements on behalf of CAA.

SEE THE **PRESS INQUIRIES POLICY** FOR MORE INFORMATION.

OUR SOCIAL MEDIA POLICY

CAA respects your right to use social media, but social media should be used in a way that is consistent with CAA values and policies and with the law.

- Use good judgment when using social media. Remember that you are solely responsible for what you post online;
- Where appropriate, clearly state that any opinions you express are your own and do not reflect those of CAA;
- Do not disclose personal or confidential business information relating to CAA, its Colleagues, clients, or business partners;
- Never post anything that is discriminatory or could constitute a threat, intimidation, harassment, or bullying.

SEE THE **SOCIAL MEDIA POLICY** FOR MORE INFORMATION.

WE VALUE AND PROTECT CONFIDENTIAL INFORMATION

CAA's continued success depends on protecting the confidential information of CAA and of our clients. Confidential information is any Company or client information that is not known generally to the public or to the industry. It includes, but is not limited to, all information concerning the business, operations, activities, personnel, finances, business and creative plans, personal habits, creative ideas and expressions, and client lists of CAA, its members, directors, officers, employees, shareholders, representatives, affiliates, and clients.

Unless authorized by CAA's management, do not disclose confidential information, or allow others to do so. Use your best efforts to avoid unintentional disclosure of confidential information. Use special care when storing or transmitting confidential information. You have a duty to protect CAA and our clients' confidential information even after your employment ends.

CAA protects the confidential information of our clients and other third parties with the same care as if it were CAA's own confidential information. In that same spirit, you should protect confidential information that you obtained in the course of prior employment.

SEE THE COMPANY PROPERTY, CONFIDENTIAL AND PROPRIETARY INFORMATION POLICY FOR MORE INFORMATION.

WE USE TECHNOLOGY RESPONSIBLY

We use technology responsibly, in compliance with law, and in accordance with CAA policies. While you can make reasonable personal use of Company technology resources, use good judgment. To the extent permitted by applicable law, anything you create, store, download, send, or receive using CAA's technology systems is Company property and can be reviewed by CAA at any time. When using CAA resources:

- Never access, store, or transmit anything that is unlawful, intimidating, obscene, or discriminatory;
- Use strong passwords and keep passwords safe;
- Lock your workstation when stepping away;
- Install security software and updates as directed and do not interfere with automatic updates.

WE MAINTAIN INFORMATION SECURITY

We understand the role of cybersecurity in protecting confidentiality and keeping our information and resources safe.

- Speak up if you see an actual or potential cybersecurity issue;
- Follow our policies and practices that have been designed to protect our networks and computers from attack and unauthorized access;
- Do not use unlicensed software or make copies of software to use at home or for someone else to use;
- Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information;
- Do not open suspicious links in emails, even if you know the source.

WE PROTECT PERSONAL INFORMATION

We respect the privacy of all CAA personnel and others with whom we conduct business. We always handle personal information and sensitive data with care.

"Personal information" is any information that could be used to identify someone either directly or indirectly, such as a name, employee ID, government-issued numbers, email address, or phone number. Sensitive or "Special Category" data includes information such as racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, genetic data, biometric data (when used for identification purposes), sexual life, and sexual orientation. Details of criminal offenses are also afforded special care under data protection laws. There are data privacy laws that prescribe how we must collect, store, use, share, transfer, and dispose of personal information, and we comply with those laws everywhere we operate. We also comply with the laws relating to data retention (how long we can keep personal information).

- Follow CAA policies and protect any personal information that is entrusted to you;
- Use personal information only in the way it is meant to be used, and do not share it with anyone inside or outside of CAA who is not authorized to see it;
- Use care when you provide personal, sensitive, and confidential information to anyone inside or outside CAA and limit access to authorized individuals;
- When we use third parties to provide services for us, make sure they understand the importance we place on protecting personal and sensitive information, and that they have adequate data privacy policies and procedures in place.

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KEEP PERSONAL INFORMATION SAFE AND SECURE.

SEE THE DATA PROTECTION POLICY, DATA RETENTION POLICY, AND COPYRIGHTED MATERIALS POLICY FOR MORE INFORMATION.

WE PROTECT THE INTELLECTUAL PROPERTY OF CAA AND OTHERS

Given the nature of our business, we frequently have access to the intellectual property of third parties, including that of clients. We protect CAA's intellectual property, and we protect the intellectual property of our clients and others.

- Never use the intellectual property of any third party without permission or the legal right to do so;
- If you suspect that intellectual property rights, including copyrights, trademarks, or trade secrets, are being infringed, contact the Office of the Chief Legal Officer;
- Do not reproduce any copyrighted work in print, video, or digital form in violation of the law. Works are considered protected even if they are not registered with the U.S. Copyright Office or any registering agency outside the U.S. and even if they do not carry the copyright symbol (©).

WE UNDERSTAND THE VALUE OF INTELLECTUAL PROPERTY, AND WE PROTECT IT.

SEE THE COPYRIGHTED MATERIALS POLICY FOR MORE INFORMATION.

WE PROTECT CAA'S OTHER ASSETS AND PROPERTY

We safeguard CAA's property from loss, damage, misuse, theft, fraud, embezzlement, and destruction. CAA's resources should be used efficiently, responsibly, and in accordance with Company policies.

OUR ASSETS CAN BE BOTH TANGIBLE AND INTANGIBLE. THEY INCLUDE THINGS LIKE COMPANY-ISSUED COMPUTERS AND TELEPHONES, OFFICE SPACE AND OFFICE FURNITURE (TANGIBLE ASSETS) AS WELL AS THINGS LIKE KNOW-HOW, COPYRIGHTS, AND CONFIDENTIAL AND PROPRIETARY INFORMATION (INTANGIBLE ASSETS). BOTH TYPES MUST BE PROTECTED.

WE MAINTAIN A SAFE AND HEALTHY WORKPLACE

The safety and security of Colleagues and those who visit CAA premises is of primary importance. We are each responsible for maintaining our facilities free from recognized hazards and obeying safety rules.

CAA strictly prohibits Colleagues, clients, vendors, visitors, or anyone else on Company premises or engaging in a Company-related activity from making threats or behaving in a violent manner.

You may not possess a weapon while on Company property or on Company business (other than law enforcement personnel and security personnel engaged in official duties).

SEE THE **STATEMENT OF HEALTH AND SAFETY IN THE WORKPLACE POLICY AND VIOLENCE IN THE WORKPLACE POLICY** FOR MORE INFORMATION.

WE PROTECT THE ENVIRONMENT

As a responsible business and industry leader, we care deeply about the health and safety of our planet. CAA operates in compliance with all applicable environmental regulations and in a manner that protects the environment. We also encourage our vendors and communities to act sustainably and protect and improve the environment.

WE TREAT OUR BUSINESS PARTNERS FAIRLY

Our business partners, such as our vendors, make significant contributions to our success. Our policy is to select business partners based on need, quality, service, price, terms, and other relevant considerations. We base our business partner relationships on the fundamental concepts of honesty, fairness, mutual respect, and nondiscrimination. We work with others who share similar values and our commitment to ethics and compliance.

- Make business partner-related decisions in the best interest of CAA, not for any personal benefit or gain for you or a family member;
- If you oversee our business partners, make sure they understand and follow our expectations for ethics and compliance and all contractual obligations;
- Where required by CAA policy, you must utilize CAA's Third Party Risk Management Procedures before engaging with third parties. Consult the Global Ethics & Compliance team for more information.

SEE THE **SUPPLIER CODE OF CONDUCT** FOR MORE INFORMATION.

WE MAINTAIN ACCURATE RECORDS

We maintain books and records that accurately reflect our business and financial situation. Such information is essential so that CAA can make informed business decisions.

Each of us has a responsibility to record transactions accurately and promptly and handle our records with care. Transactions should be recorded honestly and in accordance with our internal controls and accounting standards.

FINANCIAL RECORDS MUST BE ACCURATE AND PREPARED IN ACCORDANCE WITH CAA'S ACCOUNTING STANDARDS.

WE MANAGE COMPANY RECORDS IN COMPLIANCE WITH CAA POLICY

We manage our records properly and retain the records we need to support our tax, financial and legal obligations. Company documents should only be stored on CAA-recommended systems. Follow our Records Retention Policies and securely dispose of records that are no longer needed.

Never dispose of any documents or other records that may be relevant to an investigation or subject to a litigation hold. Contact the Office of the Chief Legal Officer if there is any doubt about whether to dispose of particular records.

WE ARE ALERT TO RISKS OF MONEY LAUNDERING, FRAUD, AND TAX EVASION

We at CAA are on the lookout for indications of money laundering or attempts by others to use CAA to evade tax obligations or commit fraud.

Money laundering is the process by which individuals or entities move criminal funds through the financial system in order to hide their criminal origins, or otherwise try to make the funds look legitimate. In order to ensure that CAA is not inadvertently used by others to engage in money laundering, fraud, or tax evasion, be on the lookout for the following types of warning signs:

- Payments requested, made, or received in currencies other than those specified in relevant contracts;
- Payments made to or received from countries unrelated to the transaction or the parties or by a third party not involved in the deal;
- Requests by third parties to make an overpayment;
- Payments in cash or cash equivalents;

- An individual working for us as an employee asks to be treated as a self-employed contractor, but without any material changes to their working conditions;
- A third party to whom we have provided services to asks us to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided;
- A third party insists on the use of side letters or refuses to put terms agreed in writing or asks for contracts or other documentation to be backdated.

SEE THE **ANTI-FACILITATION OF TAX EVASION POLICY** FOR MORE INFORMATION.

WE RESPECT AND FOLLOW INSIDER TRADING RULES

In the course of business, you may become aware of material non-public information about publicly traded companies. Using this information for personal gain or sharing it with others is not only unfair to other investors, it is also illegal.

Information may be **material** if it is likely that an investor would want to know or would benefit from having that information ahead of making an investment decision, or if disclosed, it would have an impact on the price of a security. The fact that information may have been disclosed to a few members of the public does not make it public for insider trading purposes. To be "public," the information must have been disseminated so as to reach investors generally, such as in a press release or in a public filing made with the Securities and Exchange Commission. In addition, adequate time must pass for the securities markets to absorb the information before the information is considered public.

- Never buy or sell securities of any company based on material, non-public information;
- Do not pass on material, non-public information or "tips" to others.

EXAMPLES OF INSIDE INFORMATION INCLUDE NON-PUBLIC INFORMATION ABOUT MERGERS OR ACQUISITIONS, SALES OR EARNINGS RESULTS, FINANCIAL FORECASTS, CHANGES TO THE EXECUTIVE MANAGEMENT TEAM, OR NEW PRODUCTS OR PROJECTS.

WE PROTECT HUMAN RIGHTS

We conduct our business in a manner that respects the human rights and dignity of all, and we support efforts to promote and protect human rights. CAA does not tolerate the use of child or forced labor, human trafficking, or other human rights violations. We seek to work with vendors, contractors, and other business partners who have a similar commitment.

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners;
- Remember that respect for human dignity begins with our daily interactions with one another and with our clients and includes promoting diversity and inclusion, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.

SEE THE SUPPLIER CODE OF CONDUCT AND MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR MORE INFORMATION.

OUR POLITICAL ACTIVITIES

CAA is fortunate to occasionally have the opportunity to invite political figures to speak at the Company. We do so in strict compliance with applicable law.

There are complicated laws governing how CAA as a company can contribute to the political process. You should not give or offer CAA funds or other Company assets (directly or indirectly) as any form of political contribution without obtaining pre-approval from the Global Ethics & Compliance team or Office of the Chief Legal Officer. In addition, never pressure another Colleague, client, or third party with whom we conduct business to contribute to, support, or oppose any political candidate or party.

When participating in political activities:

- Make it clear that your political views and actions are your own and not those of CAA;
- Never use CAA funds, assets, or facilities to support any political candidate or party unless specifically permitted by law and authorized by Global Ethics & Compliance or the Office of the Chief Legal Officer;
- Holding or campaigning for political office must not create, or appear to create a conflict of interest with your duties to CAA;
- Do not solicit contributions or distribute political literature during work hours;
- Never make a political or charitable contribution with the intent to improperly influence someone.

POLITICAL CONTRIBUTIONS ARE DEFINED BROADLY UNDER MOST LAWS. THEY CAN INCLUDE BUYING TICKETS TO OR PROVIDING CORPORATE RESOURCES FOR A POLITICAL FUNDRAISING EVENT.

THE CAA FOUNDATION AND OUR CHARITABLE ACTIVITIES

CAA believes that contributing to the communities where we do business is an important part of our civic responsibility. With this in mind, we launched the CAA Foundation in 1995. It harnesses the power and reach of the entertainment industry to drive positive social change.

As a Colleague, your involvement is at the heart of its mission. You are encouraged (but not required) to participate in the many opportunities it affords each of us to make a difference. To ensure that any contributions you make personally or on behalf of CAA are used as intended and do not violate any laws, please check with the Global Ethics & Compliance team, Office of the Chief Legal Officer, or the Chief Financial Officer when in doubt.

If you would like to know more, visit the CAA Foundation section of CAA's website.

CAA encourages Colleagues to donate to and participate in projects and causes that further the welfare of our local communities. It is crucial that we ascertain that the charity, project, or cause is legitimate and reputable, so as not to damage CAA's reputation and/or breach national or international laws.

Donations should never be used as a way to make an improper payment to a government official in violation of the anti-corruption laws or to fund improper activities.

WE ARE COMMITTED TO ETHICAL BUSINESS CONDUCT

When you are committed to putting clients, colleagues, and culture first, conduct matters – especially your conduct here at work. Thank you for taking the time to read the Code and for referring to it on a regular basis throughout your employment. The information it provides is designed to help you make the right decisions for you and for CAA.

We are a team. The individual actions we take and the decisions we make reflect on CAA and the world-class work that we do. Comply with the Code, our policies, and the law, and conduct business with honesty, respect, and integrity. Speak up if you ever see or suspect misconduct or are unsure about the proper course of action. When you allow these values to guide your conduct and relationships, you promote an ethical workplace and help CAA to grow and thrive.

NO RIGHTS CREATED AND NOT AN EMPLOYMENT CONTRACT

The Code does not, in any way, constitute an employment contract or an assurance of continued employment. It does not alter the terms or conditions of your employment with CAA. It is not intended to and does not create any obligations to or rights in any Colleague, client, supplier, competitor, or any other person or entity.