



FREQUENTLY ASKED QUESTIONS

Q. What is the IMAX Whistleblower Program?

The IMAX Whistleblower Program is designed to address any potential fraud, abuse, misconduct, accounting and financial irregularities and other violations of our Code of Business Conduct and Ethics, while helping to ensure a positive work environment.

Q. Why do we need a Whistleblower Program?

There are several reasons:

1. It can help us ensure a safe and ethical environment.
2. Publicly traded companies, like IMAX, are required by law (Sarbanes-Oxley Act of 2002) to have an anonymous reporting system to address accounting and auditing misconduct.
3. Reporting “hotlines” have proven to be an effective tool in helping to protect corporate financial strength.

Q. What types of situations should I report?

You should report any known or suspected violations of the IMAX Code of Business Conduct and Ethics. The Code sets out the requirements of all employees to act with the highest ethical standards and specifically prohibits such things as the acceptance of extravagant gifts, misuse of expense reports, acceptance or provision of bribes and other fraudulent activity. In addition, the Code sets out rules about insider trading, handling of confidential information, conflicts of interest and use of the internet and email. These are just some of the topics covered in the Code – you should become familiar with it and report any violation you know of, or suspect.

Q. How do I report a suspected violation?

You have several choices in reporting a suspected violation. You may at any time:

- speak directly to the Chief Compliance Officer
- speak directly to the Chief Legal Officer
- go directly to the confidential reporting service hosted by Ethicspoint (NAVEX Global) via a secure web site at www.ethicspoint.com, which is also accessible through 1-866-294-3656.

In addition, if the Chief Legal Officer or Chief Compliance Officer are involved in the matter you wish to report, you may directly email the Chief Executive Officer at ceo@imax.com or the Chairman of the IMAX Audit Committee at auditcommittee@imax.com.

By providing these choices, we can assure you that you can file a report anonymously and in the manner most comfortable or convenient to you.

The only exception to this reporting system is in relation to violations related to financial or accounting matters, which must be reported through the Ethicspoint system.

Q. Who is the Audit Committee?

The Audit Committee is a committee of our Board of Directors, currently consisting of three independent Directors. The responsibility of the Audit Committee is to support the Board of Directors in fulfilling its oversight responsibilities for the Company. The Audit Committee focuses on overseeing the integrity of the accounting and financial reporting, the internal controls and disclosure controls, the Company's legal and regulatory compliance, the ethics policy and timeliness of filings with regulatory authorities, the independence and performance of the external and internal auditors, the management of the Company's risk, credit worthiness, treasury plans and financial policies, and whistleblower and complaint procedures.

Q. Who is the Compliance Committee?

The Compliance Committee is comprised of the Chief Compliance Officer (Ken Weissman), the Chief Legal Officer (Rob Lister) and the Chief Human Resources Officer (Carrie Lindzon-Jacobs). The Compliance Committee works to ensure IMAX has the appropriate policies, standards and practices in place to comply with all legal and regulatory requirements that apply to the Company's business.

Q. If I see a violation, shouldn't I just report it to my manager or Human Resources and let them deal with it?

You certainly can. We want you to have additional ways of reporting your concerns, which is why we have provided you with opportunities to address your concerns directly to the Chief Compliance Officer or Chief Legal Officer, The Audit Committee or the CEO, in certain circumstances, or to use the Ethicspoint route to ensure that your report gets to the appropriate people.

Q. Do you really want me to report?

We certainly do. In fact, we need you to report. You know what is going on at IMAX – both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the Company and our people. Also, offering positive input, which we also encourage, may help identify issues that can improve our corporate culture and performance.

Q. What if I want to remain anonymous?

Your anonymity will be protected to the greatest extent possible, regardless of the method you choose to report. If the violation in question involves you specifically, for example in the case of a sexual harassment complaint, your identity will likely need to be revealed in order for a full investigation to take place. However, wherever possible, we will respect the requests of our employees to maintain their confidence and will discuss any need to reveal their identity with them in advance of such disclosure.

Q. It is my understanding that any report I send from a company computer generates a server log that shows every web site that my PC connects with. Won't this log identify me as the report initiator?

Ethicspoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to Ethicspoint is available. Industry usage shows that fewer than 12% of reports to an external hotline are generated during business hours as most people prefer to report from outside the workplace.

Q. Can I file a report from home and still remain anonymous?

A report from home, a neighbour's computer, or any Internet portal will remain anonymous. An Internet portal does not identify a visitor by screen name and the Ethicspoint system strips away Internet addresses so that anonymity is maintained. Plus, Ethicspoint is contractually committed not to pursue a reporter's identity.

Q. I am concerned that the information I provide Ethicspoint will ultimately reveal my identity. How can you assure me this will not happen?

The Ethicspoint system is designed to protect your anonymity. However, you as a reporting party need to ensure that the content of your report does not reveal your identity by accident if you choose to remain anonymous. At the same time, you must provide enough information to ensure that the investigation that will take place is meaningful.

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Q. I am aware of some individuals involved with unethical behavior, but it doesn't affect me. Why should I bother reporting it?

IMAX chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the Company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the effects that a lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

Q. I am not sure what I have observed or heard is a violation of Company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. Whatever route you choose to file your concern – to your manager, the HR department, Legal department or through our Ethicspoint hotline, you will be assisted to ensure a proper report is completed and fully investigated, if necessary. We would rather you reported a situation that turned out to be harmless than let possible unethical behavior go unchecked because you were unsure.

Q. Where do these reports go? Who can access them?

Regardless of the method you choose to report your concern, reports will be submitted to the Compliance Committee to investigate and resolve. At least quarterly, and more frequently in cases of alleged financial impropriety, the Compliance Committee will report to the Audit Committee of the Board of Directors. As required, the Compliance Committee will involve other members of the organization in an investigation of any report, but only as necessary. Each of the report recipients will have training in keeping these reports in the utmost confidence. The Ethicspoint system and staff are trained and committed to ensure that no report is ever shared with implicated parties, their peers, or subordinates.

Q. What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

Report distribution is designed so that no report is ever shared with implicated parties, their peers or their subordinates. If our CEO, our Chief Legal Officer or another member of the Compliance Committee are implicated, the report is available only to a specified outside party and/or the Chief Compliance Officer appointed by the Audit Committee and the Chair of the Audit Committee.

Q. What if I remember something important about the incident after I filed the report? Or what if the Company has further questions for me concerning my report?

We encourage you to file your reports directly, wherever possible, so that we can complete our investigation with the ability to continue dialogue with you, as necessary. When you file an anonymous report via the web site or hotline, you receive a unique user name and are asked to choose a password. You can return to the Ethicspoint system again either by Internet or telephone and access the original report to answer questions posed by the

Company representative and add further information that would help resolve the open issues. We strongly suggest that you return to the site in 48 hours to answer Company questions, as you and the Company will have entered into an “anonymous dialogue” where situations are not only identified but can be resolved, no matter how complex.

Q. Are these follow-on reports as secure as the first one?

All Ethicspoint correspondence is held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

As mentioned above, if the violation in question involves you specifically, for example in the case of a sexual harassment complaint, your identity will likely need to be revealed in order for a full investigation to take place.

Q. What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish. As mentioned above, this is encouraged to help the investigative process.

Q. Can I still file a report if I don't have access to the Internet?

You can file an Ethicspoint report from any computer that can access the Internet. If you do not have access or are uncomfortable using a computer, you can call the Ethicspoint toll-free hotline at 1-866-294-3656 (or collect at 1-503-748-0609 from outside of North America) which is available 24 hours a day, 365 days a year.

Q. Is the telephone toll-free hotline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the Ethicspoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

Q. Isn't this just a “Big Brother” program making everyone suspicious of everyone else?

Absolutely not. We believe the Code of Business Conduct and Ethics reflects the principles that our employees already uphold. The IMAX Whistleblower Program concentrates on being a positive aspect of our culture that allows us to maintain our high ethical standards. It allows employees to partner with management to assure a safe, secure and ethical workplace. We encourage you to use the system to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is the lifeblood of any organization and the IMAX Whistleblower Program is a great way to enhance that communication.