HARASSMENT, DISCRIMINATION AND RETALIATION PREVENTION POLICY

The Company, including its current and former divisions, subsidiaries and parent, is an equal opportunity employer and complies with all applicable laws prohibiting discrimination, harassment and retaliation. The Company will recruit and hire all persons without regard to age, ancestry, color, religious creed (including religious dress and grooming practices), mental or physical disability including HIV and AIDS, request for family or medical care leave, marital status, medical condition (including cancer and genetic characteristics), genetic information, military status, veteran status, national origin, race, sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), gender, gender identity, gender expression, sexual orientation or any other basis prohibited by law. Further, the Company administers its personnel policies, programs and practices in a nondiscriminatory manner in all aspects of the employment relationship, including wage and salary administration, work assignments, promotions, benefits, transfers, layoffs, disciplinary action and terminations.

The Company views the principles of equal opportunity as a vital element in the employment process and as a hallmark of good management. Assuring equal employment opportunity is a function and direct responsibility of all levels of management. All supervisory personnel are charged with making a personal commitment to practice and enforce the principles of this Policy.

THE WORKPLACE ENVIRONMENT AND SEXUAL HARASSMENT

The Company recognizes its obligation to provide a work environment free of unlawful discrimination, harassment and retaliation, including sexual harassment and harassment or discrimination based on age, ancestry, color, religious creed (including religious dress and grooming practices), mental or physical disability including HIV and AIDS, request for family or medical care leave, marital status, medical condition (including cancer and genetic characteristics), genetic information, military status, veteran status, national origin, race, sex (which includes pregnancy, childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), gender, gender identity, gender expression, sexual orientation or any other basis prohibited by law. In keeping with this obligation, the Company will not tolerate sexual harassment or harassment in any form proscribed by law. All employees, whether supervisors or non-supervisors, are expected to comply with this Policy.

Sexual harassment may exist where compensation or other employment benefits are conditioned on granting sexual favors. Sexual harassment also may exist where there is a hostile work environment caused by unwanted sexual advances or unwanted visual, verbal or physical conduct of a sexual nature. Under applicable state and federal laws, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute actionable sexual harassment when:

1. submission to such conduct is made, either explicitly or implicitly, a term or condition of the individual’s employment;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or

3. Such conduct has the purpose or effect or unreasonably interfering with the individual's work performance or creating an intimidating, hostile or offensive working environment.

The Company's Policy is broader than the law in that it prohibits all inappropriate conduct of a sexual nature, regardless of whether that conduct rises to the applicable legal standard. For example, one sexually explicit joke would likely violate the Company's Policy even if it would not serve as the basis for a sexual harassment lawsuit.

Sexual harassment may occur not only as result of conduct by supervisory personnel, but also due to conduct by fellow employees and, under some circumstances, conduct by customers, vendors, consultants, visitors and independent contractors. Sexual harassment can take place in the office, studio, on location sites, on social media networking sites or blogs or in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events or non-business-related social gatherings among coworkers (for example, after work drinks). This Policy applies with equal force to conduct in such settings.

This Policy seeks to prevent inappropriate conduct. Some specific examples of inappropriate conduct are:

• Offering employment benefits, such as favorable assignment or promotions in exchange for sexual favors;

• Asking for dates, or making sexual advances, propositions or flirtations where it is clear, or becomes clear, that the overture is unwelcome;

• Threatening or engaging in retaliation after such an advance is rejected;

• Displaying or distributing sexually offensive or obscene objects, pictures, magazines, cartoons, screen-savers, e-mails, cds/dvds or posters;

• Engaging in inappropriate written conduct of a sexual nature, such as suggestive jokes, cartoons or off-color or obscene letters, notes, or invitations transmitted by email, by text message, by correspondence on social media networking sites, by blogging or otherwise or by sending sexually suggestive gifts;

• Conduct of an overtly sexual or obscene sexual nature at Company-sponsored parties or events;

• Making inappropriate verbal statements of a sexual nature, such as comments about an individual's body, sexual prowess, sexual orientation or appearance or intrusive questions or comments;
• asking questions about sexual conduct or sexual orientation or disclosing or spreading rumors about yourself or others;

• inappropriate physical conduct, such as unwanted touching, pinching, impeding or blocking another person's movements, leering, whistling at or sexual gestures;

• retaliating against an employee for refusing to participate in such behavior or for complaining about such behaviors.

Please note that bullying is neither acceptable nor tolerated in the workplace, even where such conduct does not rise to the level of unlawful harassment. Employees must not engage in bullying of other employees, supervisors, customers, vendors, or visitors. Bullying includes any inappropriate conduct or comment that the person knew or reasonably ought to have known would cause humiliation or intimidation, but excludes any reasonable action taken by the Company or a supervisor relating to the management and direction of employees or the place of employment. Examples of conduct or comments that might constitute bullying and are prohibited by this Policy include but are not limited to verbal aggression or insults, calling someone derogatory names, harmful hazing or initiation practices, vandalizing personal belongings, and spreading malicious rumors.

It is each supervisor's responsibility to use his or her best efforts to ensure that conduct, which violates this Policy, does not occur in his or her department or under his or her supervision. If you are a supervisor, you are required to immediately report any complaints or violations of this Policy to an appropriate company representative, as set forth below. Your failure to do so could result in disciplinary action up to and including termination.

**COMPLAINT PROCEDURE**

An employee who has experienced or observed conduct that he or she believes is contrary to this Policy is strongly encouraged to promptly take advantage of the Company’s complaint procedure, as set forth below. The Company will take any reported violations of this Policy very seriously. An important objective of this Policy is to prevent a working environment that unreasonably interferes with an employee's work or is intimidating, hostile or offensive. It is therefore essential and required that employees immediately report conduct which is believed to be in violation of this Policy. Prompt reporting is urged so that rapid and constructive action can be taken. Early reporting and intervention has proven to be the most effective method of resolving actual or perceived incidents of harassment, discrimination, retaliation or bullying.

Violations of this Policy should be reported regardless of the offender's identity or position with the Company. Individuals who believe they have experienced or observed improper conduct by an employee, supervisor or business contact or who have concerns about such matters should comply with the following complaint procedure:

1. If you are comfortable, immediately tell the other person, preferably in private, when his or her behavior is considered inappropriate and unwelcome and request that the conduct stop. Persons so told should comply immediately and
graciously with such requests. You should report the situation as set forth in 2, 3 or 4 below.

2. If you are comfortable speaking to your immediate supervisor, then schedule a private meeting to discuss your concerns. Your supervisor is required to contact an Industrial Relations representative or a Producer or Production Executive, if applicable.

3. If you would rather not speak to your immediate supervisor, then schedule a private meeting with your Department Head or a Producer or Production Executive, if applicable. This individual will contact Industrial Relations and report the complaint.

4. If you would rather not involve your supervisor, Department Head, Producer or Production Executive, then you should contact the Industrial Relations Department directly. The contacts in Industrial Relations are:

   Jill Glosser: (323) 956-5827
   Tracy Owen: (323) 956-5205
   Ovette Slaughter-Bormann: (323) 956-5609

Any reported allegations of harassment, discrimination, retaliation or bullying will be investigated by the Company in a prompt, thorough and impartial manner. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. All reasonable efforts to maintain confidentiality throughout the investigation process will be used to the extent consistent with adequate investigation, appropriate corrective action and the Company's legal obligations. The Company will consult with the complaining employee at the conclusion of the investigation to review its resolution. Where it is determined that there has been a violation of this Policy and/or inappropriate conduct has occurred, the Company will act promptly to eliminate the conduct and impose such corrective action as necessary, including disciplinary action where appropriate. Such action may range from counseling to termination of employment, and may include such other forms of disciplinary action deemed appropriate under the circumstances. No employee will be retaliated against for making a good faith report of harassment, discrimination, retaliation or bullying. Any employee who engages in, or threatens, retaliatory conduct against another employee who makes a complaint or who participates in an investigation will be subject to disciplinary action, up to and including termination.

Please note that an employee’s failure to use the foregoing complaint process could affect his or her legal rights.

**SUPERVISOR/SUBORDINATE RELATIONSHIPS**

The Company recognizes that consenting romantic or sexual relationships may develop between a supervisor and a subordinate (whether such supervision is direct or indirect). These relationships frequently lead to complications and significant difficulties for the supervisor, the
subordinate, others in the workplace and the Company. If a consenting romantic or sexual relationship between a supervisor and subordinate should develop, the Company requires the supervisor to disclose this information to ensure that there are no issues of actual or apparent favoritism, conflicts or interest, sexual harassment or a negative impact on others in the work environment.

Upon being informed or learning of the existence of such a relationship, the Company may take steps that it deems appropriate to protect the workplace environment.
EMPLOYEE ACKNOWLEDGEMENT

By signing below, I acknowledge that I have been given a copy, have read, understand and agree to abide by the provisions set forth in the current Harassment, Discrimination and Retaliation Prevention Policy.

Dated: ______________________   ______________________

Signature

_________________________________
Print Name