



Anti-Bribery and Compliance Policy

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PURPOSE

This Anti-Bribery and Compliance Policy sets out Mid Atlantic Films' commitment to conducting business ethically, transparently and in full compliance with applicable anti-corruption laws and regulations.

Mid Atlantic Films maintains a zero-tolerance approach to bribery, corruption and improper business conduct in all jurisdictions where it operates, including Hungary.

SCOPE AND APPLICABILITY

This Anti-Bribery and Compliance Policy applies to all individuals and entities acting for or on behalf of Mid Atlantic Films, including but not limited to:

- cast and crew members,
- subcontractors,
- vendors, suppliers and service providers,
- consultants, agents and intermediaries,
- any third party representing the Company in any capacity.

Compliance with this policy is a condition of engagement on projects in which Mid Atlantic Films participates.

LEGAL FRAMEWORK

This Anti-Bribery and Compliance Policy is implemented in accordance with, but not limited to:

- the U.S. Foreign Corrupt Practices Act (FCPA),
- the UK Bribery Act 2010,
- applicable Hungarian anti-corruption and criminal laws,
- and any other applicable local or international regulations.

This policy shall be interpreted and applied in conjunction with Mid Atlantic Films' and its affiliated production entities' and its productions contractual terms, codes of conduct and internal policies.

PROHIBITION OF BRIBERY AND IMPROPER PAYMENTS

Bribery in any form is strictly prohibited.

No person covered by this Anti-Bribery and Compliance Policy may directly or indirectly offer, promise, give, request or accept any bribe, kickback, facilitation payment or other improper advantage to or from any person, whether in the public or private sector, for the purpose of obtaining or retaining business or securing an improper advantage.

This prohibition applies regardless of local customs or perceived industry practices.

GIFTS, HOSPITALITY AND BUSINESS COURTESIES

Gifts, hospitality or business courtesies may only be offered or accepted where they are:

- reasonable, proportionate and infrequent,
- provided for a legitimate business purpose,
- compliant with applicable laws and regulations,
- approved in advance by the relevant Line Producer / Production Manager,
- approved in advance by the producing studio's Legal & Business Affairs Department.

Cash, cash equivalents, gift cards, personal favors or any benefit offered or requested in exchange for preferential treatment are strictly prohibited.

THIRD PARTIES AND INTERMEDIARIES

Special care must be taken when engaging or working with third parties, including fixers, customs agents, location brokers, consultants or other intermediaries.

No third party acting on behalf of Mid Atlantic Films, its affiliated production entity or its production may request, offer or receive facilitation payments, "speed-up fees" or any other improper advantage.

All third parties must comply with this policy and applicable anti-corruption laws.

ACCURATE RECORDS AND FINANCIAL TRANSPARENCY

All financial transactions must be accurately, completely and transparently

recorded in accordance with applicable accounting, tax and audit requirements to include adherence to the standards of the producing studio.

False, misleading or incomplete records are strictly prohibited.

No undisclosed or unrecorded funds or assets may be maintained for any purpose.

REPORTING AND RAISING CONCERNS

Any suspected or actual violation of this Anti-Bribery and Compliance Policy must be reported promptly.

Reports may be made to the relevant

- the Line Producer / the Production Manager,
- the Production Office, or
- the designated Mid Atlantic Films contact for the production.

If in doubt, individuals are encouraged to seek guidance and raise concerns before taking any action.

NON-RETALIATION

Mid Atlantic Films strictly prohibits retaliation against any individual who, in good faith, reports a concern or suspected violation of this Anti-Bribery and Compliance Policy.

No person will suffer adverse consequences for raising concerns honestly and responsibly.

COMPLIANCE, ENFORCEMENT AND TRAINING

Compliance with this Anti-Bribery and Compliance Policy is mandatory.

Violations may result in disciplinary action, immediate termination of engagement with cause, contractual remedies and, where applicable, referral to authorities.

Compliance with this policy may be supported by mandatory briefings or training as required.

REVIEW AND AMENDMENTS

This Anti-Bribery and Compliance Policy may be updated from time to time to reflect changes in law, industry standards or corporate practices.