# READING INTERNATIONAL, INC.

# INTERNATIONAL ANTI-DISCRIMINATION, ANTI-HARASSMENT AND ANTI-BULLYING POLICY AND COMPLAINT AND INVESTIGATION PROCEDURES

Effective: April 1, 2019

# **OUR GOALS**

It is our Company's goal to promote a healthy, cooperative and accepting workplace in which people can work together to bring about the best in one another - a workplace where people are tolerant of one another's personal characteristics, beliefs and idiosyncrasies. We believe in the "Golden Rule;" do unto your co-worker as you would have your co-worker do unto you. We believe that the key to a healthy, cooperative and accepting workplace is our mutual respect of one another. We must all strive to interact in a polite and civil manner with one another.

This policy is intended to help our Company achieve these goals. This policy is not intended to create a culture that intrudes upon the personal affairs or beliefs of our employees, but rather to foster a work environment that is free from all forms of harassment, bullying and unlawful discrimination, whether that harassment, bullying or unlawful discrimination is because of race, color, religious creed, religious belief or observance, including dress and grooming practices, ethical beliefs, political opinions, employment status, national origin, ancestry, citizenship, age, mental or physical disability, medical condition, military or veteran status, marital or domestic partner status, sexual orientation, sex or gender (which includes pregnancy, childbirth, breastfeeding, or related medical conditions), gender identity, gender expression, genetic information or characteristics (or those of a family member), status as transitioning, transitioned, or perceived to be transitioning in sexual orientation, status as a victim of domestic violence, sexual assault, stalking, or any other characteristic protected by applicable federal, national, state, provincial, territorial or local law ("Personal Characteristics").

This policy applies to the way we relate to one another in matters related to our workplace. But, we must all recognize that we are an entertainment company, and that the work we do in our workplace is intended to be highly creative and thought provoking. Our mission is not simply to entertain, but also to make people think and to present opportunities for people to consider alternative points of view. As a result, while it is not our intention to offend, the work we generate can be highly controversial and objectionable to some people. We believe that a distinction can and must be made, in order for the artistic community to flourish, between the way we interact with one another as co-employees, working together for a common employer and sharing a common workspace, and our Company's role as a developer and conduit of art product to our society. Our policy is not intended to restrict our ability to develop or exhibit controversial entertainment product or to limit the artistic freedom of our Company or the people whose art we distribute and/or exhibit. We expect our employees and other workplace participants to deal with workplace situations in a mature manner and to be tolerant of the presentation of differing ideas, attitudes, points of view, and artistic expression.

We are an international company and this policy applies both to our direct employees and those of our various affiliates. Not surprisingly, laws related to harassment, bullying and unlawful discrimination vary from jurisdiction to jurisdiction. Our goal in adopting this policy is to provide an overarching structure and guidance as to the way we expect our employees and other workplace participants to deal with one another. Our policy may in some respects be more demanding than the minimum conduct required by applicable law. Naturally, to the extent that applicable local laws apply more demanding requirements, it is our policy to abide by and enforce such policies, and our affiliates may, from time to time, adopt policies that are more demanding than those set forth in this policy.

Summarizing: this policy is intended to establish reasonable internal guidelines for the management of our Company and to assist our Company in achieving its goal of providing a healthy, cooperative and accepting workplace for our employees and other workplace participants. It is not intended to impose new or additional obligations on our Company or to confer upon others rights not otherwise imposed or conferred by applicable regulatory laws. Moreover, this is a living policy, and may be modified, interpreted and applied, from time to time, by our Company, in its sole discretion.

# ALL HARASSMENT, BULLYING AND UNLAWFUL DISCRIMINATION IS PROHIBITED BY OUR COMPANY

Work-place harassment, including sexual harassment, bullying and unlawful discrimination will not be tolerated by our Company. This policy applies to harassment, bullying and unlawful discrimination occurring in the work environment, whether on Company premises or in any Company—related setting. Any unwelcomed conduct based on one's Personal Characteristics is forbidden under this policy, regardless of whether the individual committing the harassment and the individual being harassed share, in whole or in part, the same or different Personal Characteristics. This policy covers all employees of our Company, and other workplace participants, such as, by way of example, third party contractors (and their employees), job applicants, interns, apprentices, trainees, and volunteers. This policy also applies to our employees in respect to their dealings with our Company's clients and customers and other third parties doing business with our Company.

# PRACTICAL GUIDANCE:

- ➤ You should always consider how your behavior will be viewed by the person or persons with whom you are dealing. You might engage in conduct prohibited by this policy even if you do not intend to humiliate, offend or intimidate or to otherwise violate this policy.
- ➤ It is sometimes difficult to know whether someone will find one's behavior acceptable. What is offensive to one person may not be offensive to another. Accordingly, you should be careful not to risk offending someone and, as a result, become the subject of a complaint.
- ➤ Breach of this policy may result in disciplinary action being taken against you, which may include the termination of your employment. Also, you may be personally liable for civil damages for breaching applicable laws if you engage in harassment, bullying or unlawful discrimination. In some cases, criminal charges can be asserted against a person who engages in sexual harassment or serious bullying (which could include imprisonment and fines).

## **Unlawful Discrimination**

Discrimination occurs whenever a person is directly or indirectly disadvantaged on the grounds of any Personal Characteristic. Our Company is committed to a workplace that is free from unlawful discrimination. This means that, unless an exception applies, all offers of employment and access to opportunities and other benefits will be decided on the basis of individual merit, after considering only relevant matters, and not on any unlawful discriminatory grounds. Furthermore, no person will be refused access to services, or treated less favorably in relation to their access to services, on any unlawful discriminatory grounds. Generally speaking, while recognizing that not all discrimination is unlawful, as a general rule, it is our policy to conduct our business reasonably, so not to inappropriately or unnecessarily discriminate against individuals based on their Personal Characteristics.

Unlawful discrimination may be direct or indirect. Direct discrimination occurs where someone is treated, or proposed to be treated, less favorably because they possess a particular Personal Characteristic. An example of direct discrimination is when an employee misses out on an internal promotion because he or she is considered too old for the job. Indirect discrimination occurs where a person imposes, or proposed to impose, a requirement, condition or practice that has, or is likely to have, the effect of being less favorable to people who possess a particular protected attribute and which is not reasonable under the circumstances. An example of indirect discrimination would be a security company that has height and weight requirements for the employees – this may exclude a large portion of women - where this restriction is not reasonable under the circumstances. Naturally, there are some exceptions from the anti-discrimination laws that may apply in some situations, such as where the discrimination is due to the inherent requirements of a particular job or where there are physical constraints to the job or access.

# **PRACTICAL GUIDANCE:**

- There can sometimes be both appropriate reasons and inappropriate reasons for making a particular decision. You need to be careful to make decisions based only on appropriate reasons.
- In situations where the reasons behind a particular decision might be misperceived, there is no need to make such decision alone. You should not hesitate to share your concerns and reasoning with your supervisor, or with the Office of our General Counsel.
- The fact that there are reasons a decision might be misperceived does not mean that a decision need not or should not be made. It does mean, however, that you need to be sensitive to the situation, and seek appropriate input from another, or more senior, member of our management team. It may be that there are others better positioned to make the decision and/or to communicate the decision than yourself.
- ➤ Visualize yourself in the other person's position: how would you characterize the decision if you were in their shoes?

# **Sexual Harassment**

For purposes of this policy, sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to the advance, request or conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of the advance, request or conduct is used as a basis for employment decisions; or
- Such advances, requests or conduct have the purpose or effect of substantially or unreasonably interfering with an employee's work performance by creating an intimidating, hostile or offensive work environment.

Sexual harassment can occur in both formal and informal business situations, including Company-sponsored events, business trips, or at informal social gatherings. An act may be sexual harassment whether it is conducted in person, on the phone, or over electronic communications, including but not limited to: email, voicemail, text message, instant messaging; dating, social, or meet-up networks (either print or internet-based); and anonymous and/or print or electronic-based bulletin board communications. Further, an act may be sexual harassment regardless of the sexual desire, sexual orientation, or intent of the harasser.

Our Company will not tolerate any form of sexual harassment, direct or retaliatory, regardless of whether such sexual harassment is verbal, physical, or visual in nature. Some examples of what may constitute sexual harassment are: threatening to take or taking employment actions, such as discharge, demotion, or reassignment, if sexual favors are not granted; demands for sexual favors in exchange for favorable or preferential treatment; unwelcome and repeated flirtations, propositions or advances; unwelcome physical contact; whistling; leering; improper gestures; tricks; horseplay; use of stereotypes; offensive, insulting, derogatory, or degrading remarks; unwelcome comments about appearance; sexual jokes or use of sexually explicit or offensive language; and pranks based upon Personal Characteristics.

The above lists are illustrative only and are not intended to be all-inclusive or exhaustive.

## PRACTICAL GUIDANCE:

- Mutual attraction between people is not sexual harassment.
- ➤ Conduct which is welcome or consensual is not unlawful, and friendships (sexual or otherwise) which develop between people who meet or interact in the workplace are a private concern, provided they do not impact the workplace. However, you should take great care before engaging in conduct you believe to be welcome. Always remember that some people may not feel comfortable telling you that your behavior is offending them and is not welcome. This may be because of their personality or they are too worried about the possible impact on their employment if they complain.

- It is your responsibility to ensure that you do not engage in conduct that is not welcome. Similarly, it is your responsibility to tell someone if you do not feel comfortable with their behavior or, if you do not feel comfortable doing so, to raise the issue with your supervisor or another manager, or to otherwise report such conduct as provided in this policy.
- ➤ We do not, as a Company, ascribe to the position that "it never hurts to ask" in the context of sexual relationships. "Asking" can in fact hurt very much, and the burden is on you to make sure that you are not engaging in hurtful activity. A good rule of thumb in these situations is, when in doubt, don't ask.

# **Other Types of Harassment**

For purposes of our policy, other harassment is defined as verbal, physical or visual conduct that denigrates or shows hostility or aversion toward an individual because of an employee's Personal Characteristics, and that:

- Creates an intimidating, hostile, or offensive work environment; or
- Unreasonably interferes with an individual's work performance.

As with sexual harassment, other types of harassment can occur in both formal and informal business situations, including Company-sponsored events, business trips, or at informal social gatherings. An act may be harassment whether in person, on the phone, or over electronic communications, including but not limited to: email, voicemail, text message; dating, social, or meet-up networks (either print or internet-based); and anonymous and/or print or electronic bulletin board communications.

Some examples of such harassment are: using epithets or slurs; mocking, ridiculing or mimicking another's culture, accent, appearance, or customs; threatening, intimidating, or engaging in hostile or offensive acts that focus on a Personal Characteristic.

The above lists are illustrative only and not intended to be all-inclusive or exhaustive.

# PRACTICAL GUIDANCE:

- Once again, civility and mutual respect should be your guiding light.
- There is no bright line as to what activity constitutes and what activity does not constitute harassment. Some people may be more sensitive to such matters than others. While we expect all of our employees to be mature and to react reasonably to your interactions with them, you must remember that you are ultimately responsible for the way in which you interact with others in the workplace and that you need to be sensitive to ways in which your acts may be perceived.

#### **Bullying**

Another form of unacceptable harassment is bullying. Bullying is unwelcome or unreasonable behavior that demeans, intimidates or humiliates people either as individuals or as a group, and is unrelated to our Company's legitimate business interests. Bullying behavior is often persistent and part of a pattern,

but it can also occur as a single incident. It is usually carried out by an individual, but can also be an aspect of group behavior (see "mobbing" below). As with other forms of harassment, bullying may take place in person, by telephone or other forms of electronic communication, or through social media.

Some examples of bullying behavior are set out below, but this list is not intended to be all-inclusive or exhaustive.

*Verbal communication:* Abusive and offensive language, insults, teasing, spreading rumor or innuendo, unreasonable criticism, trivializing work or achievements, or sabotage.

*Manipulation of the Work Environment:* Isolating people from normal work interaction, excessive demands, or setting impossible deadlines.

**Psychological Manipulation:** Unfairly blaming subordinates for mistakes, setting people up for failure, deliberate exclusive, excessive supervision or "micromanaging," practical jokes, belittling or disregarding opinions or suggestions, taking credit for work where not appropriate, or publicly criticizing subordinates.

**Mobbing:** Mobbing is a particular type of bullying behavior carried out by a group rather than by an individual. Mobbing is the bullying or social isolation of a person through collective unjustified accusations, humiliation, general harassment or emotional abuse. Although it is group behavior, specific incidents such as an insult or a practical joke may be carried out by an individual as part of mobbing behavior.

#### PRACTICAL GUIDANCE:

- We understand that not all criticism is bullying. Bullying does not, for example, include reasonable management action carried out in a reasonable manner. For example, bullying does not include reasonable performance management, supervision of work, constructive criticism or the setting of high standards.
- In addition, we do not generally consider differences of opinion and disagreements to be workplace bullying. We believe that people can have disagreements in the workplace without engaging in unreasonable behavior of the type that violates this policy.
- However, supervisors need to be sensitive to the feelings of the people reporting up to them and to take care that criticism is expressed in a manner that is constructive and, to the extent possible, not embarrassing. We expect employees to demonstrate maturity and be receptive to appropriate criticism and work direction. Typically, you need to appreciate that work place direction and constructive criticism may be simply the other person attempting to do their job and not personal in nature.

For our employees working in New Zealand, further guidance, including examples of behavior that may amount to bullying, can be found in the WorkSafe New Zealand Guidelines – "<u>Preventing and Responding to Bullying at Work</u>" available from WorkSafe New Zealand's website: <u>www.worksafe.govt.nz</u>. Our Company expects that all of our employees working in New Zealand will have read and understood, and will comply with, the applicable WorkSafe New Zealand Guidelines. Even

if you are not working in New Zealand, we encourage you to take advantage of this publicly available resource to further educate yourself as to appropriate workplace behavior.

# **EMPLOYEE OBLIGATIONS**

In order to prevent harassment, bullying and unlawful discrimination, and to deal promptly and effectively with harassment, bullying and/or unlawful discrimination, if it occurs, it is essential that employees comply with their responsibilities and obligations to others in the workplace. Employees have the following responsibilities under this policy:

- (a) to comply with this policy and, for employees working in New Zealand, to also comply with the WorkSafe New Zealand Guidelines "Preventing and Responding to Workplace Bullying;"
- (b) to use their best endeavors to avoid conducting themselves in a manner which may be construed as harassment, bullying and/or unlawful discrimination;
- (c) if asked by another person to refrain from certain conduct because it is considered unwanted, unwelcome, or offensive, to immediately cease such conduct;
- (d) if they feel that they are being harassed, bullied and/or unlawfully discriminated against and do not feel comfortable approaching the other person(s) involved, to report the alleged conduct as set out under "Internal Complaint Procedure" below;
- (e) if raising a harassment, bullying and/or unlawful discrimination complaint, to raise it promptly, honestly and in good faith; and
- (f) to co-operate with any efforts made by our Company to prevent, investigate and address matters of harassment, bullying and unlawful discrimination (which may include, but is not limited to, attendance at training sessions, meeting with managers and co-operating with investigations by attending interviews and providing information as required).

# COMPLAINT AND INVESTIGATION PROCEDURES

# Supervisor Responsibilities and Reporting

Our Company strongly encourages the prompt reporting of all incidents of harassment, bullying and unlawful discrimination as defined under this policy. Our Company also encourages individuals who believe they are being harassed, bullied or unlawfully discriminated against to object to the conduct and clearly and promptly tell the person engaging in such conduct that a particular action, behavior, or statement is unwelcome, offensive or otherwise inappropriate. If you believe you are being or have been the victim of harassment, bullying or unlawful discrimination, or have observed harassment, bullying or unlawful discrimination, including inappropriate behavior by our Company's customers, vendors, or business-related contacts — you should report such conduct as provided below.

Please also refer to the Company's Whistleblower Policy.

# **Internal Complaint Procedure**

If you are subjected to any conduct by an employee of our Company or other workplace participant that you believe violates this policy or witness any such conduct by an employee of our Company or other workplace participant, you should promptly report the conduct, either orally or in writing. If employees do not report such conduct, our Company may not become aware of a possible violation of this policy and may not be able to take appropriate corrective action. You may speak to, write, or otherwise contact any of the following resources at the Company:

- Your direct supervisor or, if the conduct involves your direct supervisor, the next level above your direct supervisor,
- Any other supervisor or manager,
- Our General Counsel, and/or
- Our Principal Compliance Officer.

Confidential concerns can be communicated to our Principal Compliance Officer through any of the following means:

➤ Via Website: <u>www.lighthouse-services.com/readingrdi</u>

**➤ Via Telephone:** 

o US Employees: 1-844-449-0005

o Australia Employees:

**Telstra: 1-800-881-011**, wait for prompt, dial 800-603-2869 **Optus: 1-800-551-155**, wait for prompt, dial 800-603-2869

o New Zealand Employees: 000-911, wait for prompt, dial 800-603-2869

➤ Via E-mail: reports@lighthouse-services.com

#### Conciliated Resolution

It may be unnecessary to hold a formal investigation into the alleged conduct. If the parties are agreeable, and the alleged bullying, harassment or unlawful discrimination appears to be unintentional or of a less serious nature, the matter may be able to be resolved informally between the parties. In these circumstances, the recipient of the alleged behavior (the **complainant**) could:

- confidentially approach the other worker(s) (with or without a support person) and inform them that their behavior is unwanted and/or offensive and request that it stop. This may be done in person, by letter, phone or another confidential method; or
- approach a member of management to intervene. This intervention may involve the manager or other supervisor (as may be applicable) discussing the situation with the affected people

separately in order to resolve the situation, and/or meeting with the affected people together to resolve the matter. Any resolution should address an appropriate solution acceptable to the parties, an agreement as to how long any measures taken against the person who is the subject of the complaint should remain in force, and any monitoring to occur and any steps that may be taken if the behavior continues.

# Formal Complaint Resolution

An employee may submit a formal written complaint at any time, and agrees to do so if asked to by our Company. For example, if conciliated resolution has not been successful, or if the complaint of bullying, harassment or unlawful discrimination is considered by our Company to be potentially serious enough to warrant a formal investigation, or is against a manager or senior executive, then a formal written complaint will be required.

Although not mandatory, a Complaint Form is provided in Schedule A to this policy. Your complaint should be as detailed as possible, including the following:

- who was involved;
- the relationship with the person (e.g. do they interact in the course of their work?);
- a description of the alleged bullying, harassment and/or unlawful discrimination;
- a record of incidents, including dates, times and places;
- a list of any witnesses;
- a description of any action already taken (if any); and
- any action the complainant would like to see happen next.

When an employee reports harassment, bullying or unlawful discrimination as specified above, it is our Company's policy to undertake an investigation appropriate to the circumstances. This process may be formal or informal, and may be conducted internally or through outside consultants, or some combination thereof. The steps to be taken during the investigation will naturally vary depending upon the nature, facts and circumstances of the allegations.

Our Company will strive to maintain confidentiality throughout the investigative process, to the extent practicable, consistent with applicable law, and the Company's need to undertake an appropriate investigation. However, confidentiality cannot be guaranteed, as any responding party will need to be afforded a reasonable opportunity to explain his or her view of the situation and to otherwise present a defense.

Upon completion of the investigation, such remedial action will be taken as is determined to be appropriate by our Company, if any, as supported by the facts. Remedial action may include, in our Company's discretion, verbal or written counseling, referral to formal counseling, disciplinary suspension, probation, or discharge.

All complaints made under this policy will be treated seriously. If a false or malicious grievance is made, we will view this as a serious matter as well, and the persons or person who made the complaint may be subject to disciplinary action, up to and including dismissal.

# **No Retaliation or Victimization**

Any individual who reports an incident that the employee, in good faith, believes to be a violation of this policy or applicable law, or who is involved in the investigation of harassment, bullying or unlawful discrimination, will not be subject to reprisal or retaliation. Retaliation or victimization is a serious violation of this policy and should be reported immediately. The report and investigation of allegations of retaliation or victimization will follow the procedures set forth in this policy. Other than the taking of formal disciplinary action by our Company following an investigation where a claim has been found to have been false or malicious, any person found to have retaliated against or victimized an individual for reporting harassment, bullying or unlawful discrimination or participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action, up to and including discharge.

Victimization means subjecting a person to some detriment, for example, ostracizing an individual, because they have made a complaint under this policy or provide information in relation to such a complaint. A person can be liable for victimization whether or not the underlying complaint of harassment, bullying or unlawful discrimination is ultimately proven.

# **PRACTICAL GUIDANCE:**

- In order for this policy to work, we need your cooperation. If something bothers you in a material way, you need to let us know so that we can address the matter.
- This policy is not intended to provide redress for every minor workplace grievance. But, we recognize that this standard is necessarily subjective and, accordingly, encourage you to exercise your own personal best judgment as to whether the matter is of sufficient importance to merit our Company's intervention.
- You should not expect all complaints to result in termination or "discipline." Depending on the facts and circumstances of the situation, in some cases, education and training will be an appropriate remedy.
- Once a complaint is filed, you need to let our internal procedures to work their way through. Do not attempt to take justice into your own hands, and engage in retaliatory or victimizing behavior.

# **Administration of this Policy**

The Office of the General Counsel is responsible for the administration of this policy. If you have any questions regarding this policy or questions about harassment that are not addressed in this policy, please contact the Office of the General Counsel.

# **External Complaint Procedure**

Various levels of government have agencies to address harassment and unlawful discrimination in the workplace. If an employee believes that he or she has been harmed by any harassment, bullying or unlawful discriminatory practice, and is not satisfied with our Company's response to the problem, the employee may file a written complaint with the appropriate agency or agencies. A listing of these agencies by jurisdiction, together with contact information, is provided in Schedule B to this policy, available through our Office of the General Counsel.

You may not be retaliated against for opposing harassment, bullying or unlawful discrimination or for filing a complaint with, or otherwise participating in an investigation, proceeding, or hearing conducted by our Company, any applicable government agency. Furthermore, while we believe that it would be in the best interests of our Company for everyone, at least in the first instance, to make use of the procedures set out in this policy, the exhaustion of such procedures is not a condition to your right to seek relief from an appropriate government agency.

# CERTAIN LIMITATIONS AND QUALIFICATIONS.

All of the employees of our Company and our various affiliates are required to comply with this policy. However, this policy has not been adopted to grant, and accordingly does not grant, any contractual or other rights to employees or third parties. There are no third party beneficiaries to this policy.

This policy may be varied from time to time at the discretion of our Company. Also, our Company may, in its discretion, depart from this policy in circumstances where it determines it is appropriate to do so and will be solely responsible for its interpretation and implementation.

This policy is not intended to preclude or dissuade employees from engaging in legally protected activities, activities protected by state or federal law, including the National Labor Relations Act, such as discussing wages, benefits or terms and conditions of employment, raising complaints about working conditions for their and their fellow employees' mutual aid or protection, or legally required activities.

# EMPLOYEE ACKNOWLEDGMENT OF RECEIPT AND REVIEW

Ι,	, acknowledg	e that	on
, I received a copy	of the Company's Anti-Discrimination, Anti-Harassr	nent and A	nti-
Bullying Policy and Complaint and I	nvestigation Procedure and that I read it, understood	it and agree	e to
comply with it. I understand that the	Company has the maximum discretion permitted by la	w to interp	ret,
administer, change, modify or delete t	his policy at any time. No statement or representation	oy a supervi	isor
or manager or any other employee, wh	hether oral or written, can supplement or modify this p	olicy. Chan	ges
can only be made if approved in writing	ng by the Chief Executive Officer of the Company. I a	lso underst	and
that any delay or failure by the Comp	pany to enforce any work policy or rule will not cons	titute a wai	iver
of the Company's right to do so in	n the future. I understand that neither this policy	nor any ot	ther
communication by a management r	representative or any other employee, whether oral	or written	, is
intended in any way to create a co	ontract of employment. With respect to any existing	ng contract	t of
employment that I may have with the	e Company or any of its affiliates, I agree that the obli	igations on	me
imposed by this policy are hereby inc	corporated into that contract of employment, to the ma	aximum ex	tent
permitted by applicable law.			
	Signature		
	Printed Name		
	Date		

#### Schedule A

### READING INTERNATIONAL, INC.

# ANTI-DISCRIMINATION, ANTI-HARASSMENT, AND ANTI-BULLYING POLICY AND COMPLAINT AND INVESTIGATION PROCEDURES

# **Complaint Form**

It is Reading International, Inc.'s policy to investigate fairly, timely and thoroughly all harassment, bullying and unlawful discrimination complaints and take appropriate action. Please refer to the Company's Anti-Discrimination, Anti-Harassment, and Anti-Bullying Policy and Complaint and Investigation Procedures (the "Policy") available on the Company's website. If you wish, use this form to document your complaint, adding additional pages if necessary, and submit to any one of the individuals designated in the Policy under Internal Complaint Procedures.

V. N	
Your Name:	
Date:	
The person or persons involved in the complaint are:	
Describe the relationship with person or persons involved in the compla	int.
Describe the nature of the complaint.	
Describe the event or events that are the subject of the complaint, include	ling dates, times and places.

List the names of any witnesses.		
Identify any individuals spoken to and describe any action already taken.		
Describe any action that you would like to see happen as a result of the complaint.		

It may become necessary to disclose your identity and/or complaint, as well as to conduct a formal investigation. Should such disclosure become necessary, we will use reasonable efforts to limit such disclosure to persons who have a need to know your identity or the details and nature of the complaint. We will endeavor to preserve confidentiality to the extent reasonably possible.

If you have any questions regarding how to file a complaint, please contact:

Reading International, Inc. 5995 Sepulveda Blvd, Suite 300

Culver City, CA 90230

Attn: Office of the General Counsel

Phone: (213) 235-2240

Email: <a href="mailto:legal@readingrdi.com">legal@readingrdi.com</a>

You should be aware that various levels of government have agencies to address harassment and unlawful discrimination in the workplace. A listing of these agencies by jurisdiction, together with contact information, is provided in Schedule B to the Policy, available through the Company's Office of the General Counsel.

THIS COMPLAINT FORM IS FOR USE BY OUR ATTORNEYS IN THE EVENT LITIGATION FOLLOWS.

# Schedule B

# In the United States:

State	Procedure for external reporting
California	If you are subjected to any conduct that you believe violates this policy, you may also:  • file a complaint of discrimination with the Department of Fair Employment and Housing (DFEH) within one year of the harassment. For more information, contact the DFEH toll free at (800) 884-1684 or visit http://www.dfeh.ca.gov/.  • file a complaint with the federal Equal Employment Opportunity Commission (EEOC). For more information, contact the EEOC toll free at (800) 669-4000 or visit http://www.eeoc.gov/
New York	In addition to our internal reporting procedures, employees who believe they have been subjected to harassment in the workplace may also seek relief by:  • Filing a complaint alleging violation of the NYSHRL either with the Division of Human Rights (DHR) within one year of the harassment or in New York State Supreme Court. DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: http://www.dhr.ny.gov. Contact DHR at (888) 392-3644 or visit for more information about filing a complaint.  • Filing a "Charge of Discrimination" with the Equal Employment Opportunity Commission (EEOC) for violation of federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964 (Title VII). Employees can contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at http://www.eeoc.gov, or by email at info@eeoc.gov

# Schedule B

State	Procedure for external reporting
New Jersey	If you are subjected to any conduct that you believe violates this policy, you may also:  • file a complaint of discrimination with the New Jersey Division of Civil Rights (DCR)  within 180 days of the harassment. For more information, contact the DCR toll free at 1-866-405-3050 or visit  https://www.nj.gov/oag/dcr/filing.html.  • file a complaint with the federal Equal Employment Opportunity Commission (EEOC). For more information, contact the EEOC toll free at (800) 669-4000 or visit http://www.eeoc.gov/
Hawaii	If you are subjected to any conduct that you believe violates this policy, you may also:  • file a complaint of discrimination with the Hawaii Civil Rights Commission within  180 days of the harassment. For more information, contact the HCRC toll free at (808) 586-8692 or visit  http://labor.hawaii.gov/hcrc/forms/  • file a complaint with the federal Equal Employment Opportunity Commission (EEOC). For more information, contact the EEOC toll free at (800) 669-4000 or visit http://www.eeoc.gov/
Texas	If you are subjected to any conduct that you believe violates this policy, you may also:  • file a complaint of discrimination with the Texas Workforce Commission within 180 days of the harassment. For more information, contact the TWC 512-463-2642 or 888-452-4778 (in Texas only) or visit  https://twc.texas.gov/jobseekers/howsubmit-employment-discrimination-complaint  • file a complaint with the federal Equal Employment Opportunity Commission (EEOC). For more information, contact the EEOC toll free at (800) 669-4000 or visit http://www.eeoc.gov/

# Schedule B

#### In New Zealand:

If you are dissatisfied with the outcome of an internal investigation, you may make a complaint to the Human Rights Commission or raise a personal grievance with the Employment Relations Authority under the Employment Relations Act 2000.

Employees may seek confidential counselling through the Company's Employee Assistance Programme, which may also assist the employee in determining the appropriate option for dealing with any alleged bullying, harassment and/or unlawful discrimination.

Australia: Not Applicable