

## SUPPLIERS' CODE OF CONDUCT

### CULVER MAX ENTERTAINMENT PRIVATE LIMITED

#### Document Control

Policy	SUPPLIERS' CODE OF CONDUCT - version 2.0
Issued By	Legal Department

Version	Date	Reason for change	Owner/prepared by	Approved by
Version 1.0	15-Sep-2022	New document	Rajkumar Bidawatka	Ashok Nambissan
Version 2.0	20-July-2025	Reviewed Version	Rajkumar Bidawatka	Ritesh Khosla

This is Suppliers' Code of Conduct (Code) document, it applies to contractors, vendors, service providers or suppliers (collectively, "Suppliers") of Culver Max Entertainment Private Limited (formerly Sony Pictures Networks India Private Limited) and its subsidiaries ("Sony" or the "Company"). The Company expects that all its Suppliers comply with all applicable laws and regulations and to conduct business activities in an honest, ethical, and responsible manner.

This Code contains general requirements applicable to all Sony Suppliers. Supplier contracts may contain more specific provisions addressing some of these same matters. Nothing in this Code is meant to supersede any more specific provision in a particular contract, and to the extent any inconsistency exists between this Code and any other provision of a particular contract, the other provision will control.

### **1. Conflicts of Interest**

Suppliers are expected not to have any kind of conflict of interest or potential conflict of interest with any employee of Sony. If a Supplier's employee is a relative of an employee of Sony, or if a Supplier has any other relationship with an employee of The Company, the Supplier should promptly disclose this fact to the Company

### **2. Bribery**

The Company prohibits corrupt practices in any form, including bribery, kickbacks, and other unlawful payments, in both the public (government) and the private (commercial) sectors. In connection with any transaction involving Sony, the Supplier must not give or offer to give anything of value (payment, gifts, entertainment, or business amenity), directly or indirectly, to individuals to improperly influence them to obtain or retain business, or to secure any improper business advantage. Great care must be taken in dealing with government officials. Suppliers acting on behalf of Sony must comply with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, as well as all local laws dealing with bribery of government officials including The Prevention of Corruption Act, 1988. Suppliers must not give anything of value to a government official on the Company's behalf (or while interacting with government on the Company's behalf) without prior written approval from finance and legal department of the Sony, which can be obtained through the Supplier's primary contact/relationship manager at the Company. In addition to obtaining prior approval, Suppliers must keep a written accounting record of all payments (including any gifts, meals, entertainment, or anything else of value) made on behalf of Sony or out of funds provided by Sony. Suppliers must furnish a copy of this accounting record to Sony upon request.

### **3. Gifts, Meals, and Entertainment**

Suppliers are discouraged from offering any gifts, meals, entertainment, or other favors to Sony employees. The Code of Conduct of Sony prohibits its employees from accepting gifts, meals or entertainment unless expressly permitted under the policy. Suppliers are also required to record and report in writing to Sony at [Supplier.COC@setindia.com](mailto:Supplier.COC@setindia.com), any gift, entertainment or favor's given to or received by Suppliers, whose value (or cumulative value in any one year) exceeds INR 20,000. When providing services to the Company or otherwise acting on the Company's behalf, Supplier's

employees are subject to the same guidelines with respect to gifts, meals, entertainment etc. as are applicable to the employees of Sony.

#### **4. Protecting Confidential Information**

Suppliers should protect Sony's confidential information. Suppliers who have been given access to confidential information as part of the business relationship should not share this information with anyone unless authorized to do so by the Company. Suppliers should not trade in securities, or encourage others to do so, based on confidential information received while providing services to or acting on behalf of Sony. If a Supplier believes it has been given access to Sony's or any other third party's confidential information in error, the Supplier should immediately notify its contact at the Company and refrain from further distribution of the information. Similarly, a Supplier should not share with anyone at Sony, the information related to any other company, if the Supplier is under a contractual or legal obligation not to share the information.

#### **5. Trade Controls**

Suppliers must comply with applicable trade control laws and regulations. These laws and regulations prohibit or restrict sales or other transactions involving certain products, services, software and technologies to certain countries, individuals, or entities to secure international peace and security. Suppliers must know and comply with those laws and regulations.

#### **6. Business and Financial Records**

Both Supplier and Sony must keep accurate records of all matters related to the Supplier's business with Sony. This includes the proper recording of all expenses and payments, If Sony is being charged for a Supplier's employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period or a different heading. Invoices need to be adequately supported by requisite supporting documents which evidence delivery of goods and services.

#### **7. Privacy**

Sony respects the privacy of individuals, such as customers, employees of Suppliers, and Sony personnel. Suppliers should develop and implement policies and internal rules regarding personal information and observe and comply with all applicable laws, regulations and policies whenever collecting, maintaining, using, disclosing, or disposing of personal and sensitive information.

#### **8. Human Rights**

Sony believes that all human beings should be treated with dignity and respect. Suppliers should be committed to upholding internationally recognized human rights of all people, including using all reasonable efforts to avoid causing or contributing to adverse human rights impacts that may arise from operations, products, services and/or business relationships. Suppliers should help remediate any adverse impacts that may occur. Additionally, Suppliers must not use any form of forced or involuntary labor, where people are forced to work against

their will, including forced labor to work off a debt, prison labor or human trafficking. Suppliers also should not use child labor. "Child" means a person, younger than fourteen years of age. This does not apply to work or service of performers or recording artists, to the extent permitted by local law (for example, a child actor/actress).

## 9. Non-Discrimination

Sony values diversity and inclusion at the workplace. Suppliers should be committed to a workforce free of unlawful harassment and discrimination. Suppliers shall not engage in discrimination on any basis protected by the laws of the jurisdiction in which they operate in hiring and employment practices.

## 10. Healthy and Safe Work Environment

Sony is committed to maintaining a healthy, safe, and productive work environment. The Company expects its Suppliers to comply with all applicable health and safety laws and regulations to help ensure workplace safety. Suppliers also need to be compliant with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Suppliers must also recognize that workers' continuing education and feedback is essential to identify and solve health and safety issues at the workplace. Suppliers should implement suitable programs addressing topics of employee health and safety including occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing.

## 11. Environmental

Sony expects its Suppliers to recognize that environmental responsibility is integral to producing world class products and sustaining quality of life for future generations. Suppliers are expected to have suitable programs in place which address topics including environmental permits and reporting, pollution prevention and resource reduction, hazardous substances, solid waste, air emissions, materials restrictions, water management, energy consumption and greenhouse gas emissions.

## 12. Reporting Potential Misconduct

Suppliers who believe that an employee of Sony, or anyone acting on behalf of Sony, have engaged in illegal or otherwise improper conduct, should report the matter to the Company. Please visit [www.sony.alertline.com](http://www.sony.alertline.com) to report any illegal or otherwise improper conduct. You also have the option to call Sony's Ethics and Compliance Hotline by dialing the Country Access Code: 000-117 and when prompted dial 855-315-0767. Alternatively, a Supplier may write to [Supplier.COC@setindia.com](mailto:Supplier.COC@setindia.com) in case of any question or concern regarding this Code, or to otherwise report an illegal or improper conduct. A Supplier's relationship with Sony will not be affected by an honest report of potential misconduct.

***This policy document has been put in place on the instructions of the General Counsel, Mr. Ritesh Khosla. It has been designed and developed by the relevant Legal Vertical Heads to ensure alignment with applicable legal and regulatory requirements. The policy is issued on behalf of the Legal Department by the undersigned for formal circulation and operational adoption across the organization.***

**Issued By**

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Rajkumar Bidawatka

Company Secretary, Compliance Officer and He...

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**Signature:**

**Email:**