



CODE OF BUSINESS CONDUCT AND ETHICS FOR BUSINESS PARTNERS

CEC Brands, LLC and its subsidiaries (collectively referred to as the “Company”) believe in doing business with only those business partners, including suppliers, manufacturers, franchisees, contractors, joint venture partners, agents, distributors and consultants, who embrace and demonstrate high standards of ethical business behavior. While the Company recognizes that its business partners are independent businesses, actions by those with whom the Company does business are sometimes attributed to the Company itself, affecting its reputation and the goodwill it has with its guests and others. It is only natural then that the Company expects its partners in business to act with the same level of honesty and integrity. The Company has established this Code of Business Conduct and Ethics for Business Partners (this “Code”) to set forth the basic requirements we expect you to meet with respect to your performance as a business partner of the Company.

All business partners must comply with this Code and must ensure their subcontractors, including sub-assembly factories that produce products or materials for the Company, comply with this Code. Compliance with this Code is in addition to, not in lieu of, any business partner obligations set forth in any agreements between business partners and the Company or its designated purchasing agent.

Business partners must observe the basic principles set forth in the Company’s Code of Business Conduct and Ethics (the “the Company Code”) and policies referenced in the Company Code (e.g. the Company’s Anti-bribery and Corruption Policy), which are designed to ensure compliance by the Company employees, officers, managers and directors with ethical guidelines and applicable laws and regulations (a copy of which is available on <https://investor.cecentertainment.com/> under the Governance link). Business partners can meet this requirement either through compliance with their own code of conduct which must embody the philosophy and basic principles contained in the Company Code or by adhering to the principles in the Company Code.

Compliance with Laws and Regulations

Business partners, including all subcontractors, must operate in full compliance with the laws of their respective countries and with all applicable rules, regulations, customs and published industry standards applicable to them, including but not limited to those relating to labor, worker health and safety, freedom of association and the environment. Business partners shall comply with all import/export requirements of the U.S. Customs Service and all U.S. Government agencies.

Product Quality and Safety

The Company has a fundamental responsibility to ensure that consumers can trust the safety and quality of its products. Business partners are expected to provide goods and services that meet or exceed all government and all agreed upon quality and safety standards. Any threats to product safety must be immediately reported to the Company.

Employment Practices

The Company has a strong commitment to treating its employees fairly, and with dignity and respect. We believe in doing business with business partners who share this commitment, and we expect business partners to comply with all applicable employment laws and to support fundamental human rights for all people. Our expectations include:

- Child labor. Every worker employed by a business partner must meet the applicable minimum legal age. Each business partner must comply with applicable child labor laws, including those related to hiring, wages, hours worked, overtime and working conditions.
- Working hours. Business partners must ensure that all employees working hours are in compliance with all applicable national and local laws pertaining to the number of hours and days worked. Such employees are to be provided with reasonable daily and weekly work schedules and adequate allowance is to be made for time off.
- Compensation. Employees must be fairly compensated and provided with wages and benefits that comply with applicable national and local laws. This includes appropriate compensation for overtime work and other premium pay situations required by applicable national and local laws. If local laws do not provide for overtime pay, business partners will pay at least regular wages for overtime work.
- Diversity, Discrimination, Harassment and Abuse. The Company values, honors and respects differences and diversity in its employees, guests and business partners. While the Company recognizes and respects that cultural differences exist and different standards apply in various countries, we expect our business partners to provide a work environment that offers equal opportunity to its employees and that is free from unlawful discrimination or harassment; one in which each employee is treated with dignity and respect.
- Forced Labor. Business partners must not use involuntary labor of any kind, including prison labor, debt bondage, indentured servitude or forced labor by governments, and we will terminate our business relationship with any business partner who uses involuntary labor or purchases from any subcontractor who uses involuntary labor of any kind. If a business partner recruits foreign contract workers, the business partner must pay agency recruitment commissions and must not require any worker to remain in employment for any period of time against his or her will. Likewise, the use of physical acts to punish or coerce workers, or psychological coercion, or any other form

of non-physical abuse, including threats of violence, sexual harassment or verbal abuse is strictly prohibited.

- Working Conditions. Business partners must treat all workers with respect and dignity and provide them with a safe and healthy working environment and, where provided, living environment. Business partners must comply with all applicable laws, codes and ordinances regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection, and electrical, mechanical and structural safety. At a minimum, business partners must provide potable drinking water, clean and accessible restrooms, adequate lighting and ventilation, fire and emergency exits, essential life safety equipment, emergency aid kits and access to emergency medical care.

Environment

The Company believes in doing business with business partners who share its commitment to protecting the quality of the environment around the world through sound environmental management. Business partners are expected to comply with all applicable environmental laws and regulations.

Conflicts of Interest

The Company expects business decisions to be made in the best interest of the company. Any situation that creates or appears to create a conflict between personal interests and the interests of the Company must be avoided. Business partners are expected to disclose actual or potential conflicts of interest to the Company's Legal Department.

Anti-corruption

The Company strictly abides by all applicable laws relating to anti-corruption, including the U.S. Foreign Corrupt Practices Act, has a robust policy prohibiting bribery in business transactions, and expects its business partners to act in a similar manner. Business partners may not pay bribes or engage in corrupt practices in order to advance the Company's business interests. This includes directly or indirectly offering, promising to pay or authorizing the payment of money or anything of value to government officials (including any employee or officer of a government), including any federal, regional, or local department, agency, enterprise or instrumentality owned or controlled by the government, political parties, party officials, candidates for political office, or officials of public international organizations (like the European Union or the World Bank) in an effort to influence any official decision that would assist the Company in obtaining or retaining business, or securing any improper commercial advantage. For further guidance, please refer to the Company's Anti-Bribery and Corruption Policy.

Gifts and Entertainment

Gifts, favors and entertainment are not needed in order to conduct business with the Company, and may lead or appear to lead to a conflict of interest. We are dedicated to treating fairly and impartially all persons and firms with whom we do business. Business partners must not give or receive gifts, entertainment, gratuities or other items of value that could influence or be perceived to influence business decisions.

Working together means that sometimes you may engage in business-related entertainment with the Company employees or other representatives of the Company. Such activities may be acceptable as long as they are reasonable, both in cost and scope, are conducted in the best interest of the Company in connection with the Company business, and are not intended or expected to, and do not, influence the Company's business-related decisions. Gifts should not be given or received with such frequency that it appears that an effort is being made to avoid restrictions under local law or the Company policies. It is important that business partners refer to any agreements between them and the Company, which may contain greater detail and restrictions regarding entertainment and gifts. For further guidance, refer to the Company's Anti-Bribery and Corruption Policy.

Confidential and Proprietary Information

Business partners are expected to safeguard the Company's confidential and proprietary information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential and proprietary information in public areas. Business partners must not disclose the Company's confidential or proprietary information to other parties, except as specifically authorized by a Company officer or when disclosure is required by law. Confidential or proprietary information includes all non-public information of the Company, including but not limited to trade secrets, detailed sales and profit figures, new product or marketing plans, research and development ideas and information, manufacturing processes, personnel information, and information about potential acquisitions, divestitures and investments. The obligation to preserve the Company's confidential information is ongoing, even after the business relationship ends. The Company will respect and safeguard the confidential information of our business partners. Business partners are also prohibited from (a) taking for themselves opportunities that are discovered through the use of the Company confidential or proprietary information and (b) using the Company's confidential or proprietary information for personal gain.

Data Security

In the course of performing services or providing goods to the Company, business partners may receive or have access to personally identifiable information or credit/debit cardholder data from the Company's employees, guests or other third parties ("PII"). To the extent applicable and subject to the contractual terms concerning data security in an agreement between the Company and the business partner, the business partner shall maintain a formal security program in accordance with applicable law and industry standards that is designed to: (i) ensure the security and integrity of PII; (ii) protect against threats or hazards to the security or integrity of PII; and (iii) prevent unauthorized access to PII. PII may constitute material, non-public information;

therefore, business partners must agree to hold such information in strict trust and confidence, and that it is each business partner's responsibility to advise those of its employees and representatives to whom the business partner provides access to PII. If a business partner believes or discovers that there has been a disclosure—whether intentional or unintentional—of PII to a third party, the business partner must notify the Company as soon as possible.

Fair Competition and Antitrust

The Company believes in free and open competition, and strictly abides by all applicable fair competition and antitrust laws in the countries where the Company conducts business. Business partners are expected to comply with all applicable laws and regulations regarding fair competition and antitrust.

Accuracy and Retention of Business Records

Business partners are expected to record and report information accurately and honestly. Business partners are expected not to hide, fail to record, or make false entries in connection with any business records. All records, including financial and operational records, are expected to accurately reflect transactions, payments and events, to include sufficient detail so that improper payments may not be hidden, to be filed in a timely fashion, to conform to any requirements of the Company made known to business partners and to be maintained in accordance with applicable law.

Use of Trademarks and Domain Names

Any use of the Company's trademarks or domain names by business partners must be submitted to the Company's Legal Department for approval prior to use.

Intellectual Property Rights

Business partners must ensure that the products sold to the Company do not violate the patent, trademark, copyright or proprietary rights of any third party.

Insider Trading

Business partners and their employees may not trade in the Company's equity or debt if they are in possession of any material, non-public information about the Company. If there is any uncertainty as to whether information is material or non-public, business partners must contact the Company's General Counsel or Legal Department.

Public Relations

Business partners may not speak to the press on the Company's behalf. If a business partner is approached by the press concerning the Company said business partner shall: (i) refer the press to the Company's Marketing department; and (ii) immediately notify the Company's Legal Department.

Communication

We expect our business partners to communicate these principles articulated in this Code to their employees and business partners, and for their employees and business partners to adhere to them.

Monitoring and Compliance

As a condition of doing business with the Company, each and every business partner must comply with this Code. The Company shall have the right (but not the obligation) to monitor compliance with this Code, including the right to conduct, or have its designee(s) conduct, unannounced inspections of business partners' facilities and records. In the event that the Company conducts an inspection regarding any practices regulated by this Code, a business partner must cooperate fully in that investigation including, for example, by making all relevant records available and providing all relevant employees for interviews. If the Company determines that any business partner has violated this Code, the Company may suspend current business activity, cancel outstanding orders and terminate its business relationship with the business partner or require the business partner to implement a corrective action plan. Business partners are expected to notify the Company immediately if they become aware of any non-compliant practices by themselves, their employees or their business partners under this Code. Business partners are further expected to promptly develop and implement plans or programs to correct any such practices.

Each business partner agrees to indemnify the Company and hold the Company harmless for any breach by them of this Code, including for any claims, liabilities, costs and expenses made against the Company, any of its affiliates or its or their officers, directors, employees or agents arising out of or in connection with any breach of this Code.

Our Expectation

We expect all business partners to live up to the principles articulated in this Code and do the right thing. A business partner's failure to observe and abide by this Code may result in the Company ceasing to do business with it.

No Third Party Beneficiary Rights

The provisions of this Code are intended only to confirm the basic requirements the Company expects to be met by its business partners. This Code shall in no way be construed as conferring, or in any way granting rights of any kind to any third party.

Acknowledgement

Each business partner agrees that by providing goods and/or services to the Company it is acknowledging that it understands the requirements set forth in this Code and the policies referenced in it, is in compliance with all requirements of this Code and the policies referenced in it, and will continue to comply with such requirements during the time it is an active business partner of the Company. Business partner agrees to acknowledge its compliance with the Company's Anti-Bribery and Corruption Policy, as set forth in that policy. In addition, business partner agrees to cooperate with the Company's due diligence requests and evaluation and authorizes the procurement of an investigative background search in accordance with anti-terrorism legislation, such as the USA Patriot Act and Section 1 of U.S. Executive Order 13224, issued September 23, 2001. Business partner also certifies that neither it nor any of its funding sources, is or has ever been a terrorist or suspected terrorist, or a person or entity described in the aforementioned legislation. Business partner understands that the Company will not associate with any business partner if the business partner has ever been a suspected terrorist or associated in any way with terrorist activities.

Speaking up/Reporting of Questionable Behavior and Possible Violations

We expect our business partners to be as passionate about compliance as we are, so we encourage them to report any unethical behavior without fear of retaliation. If you wish to report questionable behavior or a possible violation of this Code, or other illegal or unethical activity, please report it by (1) calling our Compliance Hotline at 1-800-789-5216 or (2) our dedicated and secure reporting website, which is located at <https://cecentertainment.ethicspoint.com>. We expect all business partners to communicate concerns about inappropriate business practices promptly to us.