

RESPECT, DIVERSITY AND INCLUSION, AND EQUAL EMPLOYMENT OPPORTUNITY

At Endeavor (the “Company”), we are committed to creating an environment of mutual respect that allows each of us to do our very best work. This means we are committed to equal opportunities for all applicants and employees. We believe that diversity and inclusion is critical to our success as a global company, and we seek to recruit, develop and retain the most talented people from a diverse candidate pool. Advancement at our Company is based on talent and performance.

This policy applies to all areas of employment, including recruitment, testing, screening, hiring, selection for training, upgrading, transfer, demotion, layoff, discipline, termination, compensation, benefits, and all other privileges, terms, and conditions of employment. This policy prohibits employment discrimination against any employee or applicant on the basis of any Protected Status outlined in this policy (defined below).

The Company also makes reasonable accommodations for applicants and employees with disabilities, in accordance with applicable legal requirements. Any applicant or employee who requires an accommodation to perform the essential functions of the job should contact the Human Resources Department to request that accommodation. The Company will work with that individual to attempt to identify whether a reasonable accommodation can be implemented, in accordance with applicable law.

All employees must follow this policy. Any employee who violates this policy will be subject to disciplinary action, up to and including termination of their employment.

The Company will not tolerate intimidation or retaliation against employees or applicants because they have engaged in or may engage in filing a complaint of discrimination or retaliation; assisting or participating in an investigation; opposing any act or practice made unlawful by any applicable law; or for exercising any other legally-protected right.

If you feel that you have been discriminated against because of your Protected Status, have been improperly denied a reasonable accommodation, have experienced retaliation, or have witnessed or been subjected to conduct that is otherwise inconsistent with this policy, then you must follow the relevant reporting procedures outlined in the Policy Against Sexual Harassment and Other Workplace Harassment below. This policy contains information about the Company’s investigation procedures and resolution of complaints.

Individuals with supervisory responsibility are required to immediately report such alleged conduct to the relevant responsible person upon witnessing or hearing about it, regardless of how they learned of it.

POLICY AGAINST SEXUAL HARASSMENT AND OTHER WORKPLACE HARASSMENT

A. Purpose

The Company strictly prohibits and will not tolerate harassment of any kind. Employees are prohibited from harassing other employees on or off company premises, during working hours or off duty. We expect every employee to show respect for all of our colleagues, clients, employees, and vendors. Professional conduct furthers the Company's goal to create an environment of high performance and productivity. Accordingly, this policy forbids any unwelcome conduct that is based on an individual's race, color, ethnicity, religion, sex (including pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), gender, gender identity, gender expression, sex stereotyping (including assumptions about a person's appearance or behavior, gender roles, gender expression, or gender identity), ethnic or national origin, age, mental or physical disability, ancestry, medical condition, marital status, military or veteran status, citizenship status, sexual orientation, genetic information, or any other protected status of an individual or that individual's associates or relatives under applicable law ("Protected Status(es)"). We interpret these Protected Statuses broadly to include both the actual status and also any perceptions and assumptions made regarding these statuses. The Company is thus committed to providing a work environment that is free of discrimination, including harassment that is based on any legally-Protected Status.

B. Coverage

This policy and applicable law forbids any employee, manager, supervisor, officer, director, client, vendor, or any other third party that an employee encounters in connection with Company business, to harass, discriminate, or retaliate against any Company employee, applicant, contractor, intern, volunteer, or client on the basis of any Protected Status or activity. This policy also prohibits offensive conduct even if such conduct does not rise to a violation of law, as explained below.

C. Prohibited Conduct

The conduct prohibited by this policy, whether verbal, physical, or visual, includes any discriminatory action and any unwelcome conduct that is inflicted on someone because of or in connection with a Protected Status, whether that is the Protected Status of the individual who is subject to the conduct in question or the Protected Status of another individual. Among the types of unwelcome conduct prohibited by this policy are epithets, slurs, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic or offensive materials,

including materials that show hostility toward individuals because of or in connection with a Protected Status. Endeavor prohibits that conduct, even if the conduct is not sufficiently severe or pervasive to constitute unlawful harassment. Harassment can occur irrespective of the motive of the harasser. It is the effect of the harasser's actions on an individual which is most important, not just the intention behind it.

D. Sexual Harassment

This policy also forbids all forms of harassment where the conduct in question is sexual in nature. Such conduct is prohibited in the workplace and any other locations where Company business is being performed (e.g., during work-related travel, client events, industry events, etc.), and at all work-related events and activities.

Sexual harassment can include any unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex when: (1) submission to such conduct becomes an implicit or explicit term or condition of employment, (2) submission to or rejection of the conduct is used as the basis for any employment decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment does not have to be of a sexual nature, however, and can include offensive remarks about a person's sex. For example, employees must not harass a woman by making offensive comments about women in general. Both victim and the harasser can be either a woman or a man, and the victim and harasser can be the same sex. The harasser can be the victim's supervisor, a supervisor in another area, a co-worker, a subordinate, or someone who is not an Endeavor employee, such as a vendor, client or customer.

This policy forbids unwelcome conduct based on gender regardless of whether such conduct is sufficiently severe or pervasive or otherwise of such a nature to rise to the level of a legal violation. Examples of misconduct forbidden by this policy include but are not limited to the following:

- (1) offensive sex-oriented verbal kidding, teasing or jokes;
- (2) repeated unwanted sexual flirtations, advances or propositions (whether direct or by gesture);
- (3) verbal abuse of a sexual nature;
- (4) graphic or degrading comments about an individual's appearance or sexual activity; (5) offensive visual conduct, including, but not limited to, leering, making sexual gestures, the display of offensive sexually suggestive objects or pictures, cartoons or posters;
- (6) unwelcome pressure for sexual activity;

- (7) sexually-suggestive or obscene letters, notes or invitations;
- (8) offensive or unwelcome physical contact such as, but not limited to, patting, grabbing, pinching, or brushing against another's body; and
- (9) sexual favoritism.

E. Adult Content

The Company is dedicated to helping its clients pursue their goals. From time-to-time, depending upon your job duties, the Company's business and the services it provides for clients may involve exposure to subject matter that is sexually explicit or graphic, or may otherwise be deemed offensive or disturbing. Should you at any time find that you are uncomfortable being exposed to any such material in the course of your duties, you should discuss your concerns with either your supervisor or a representative of Human Resources.

F. Employee Responsibility

We each have the opportunity to positively impact the Endeavor culture, and to that end, everyone at Endeavor is expected to help assure that our workplace is free from discrimination, harassment, and retaliation.

G. Avoiding Prohibited Conduct

Everyone is expected to avoid any behavior or conduct that could reasonably be interpreted as prohibited conduct, sexual harassment, discrimination, or retaliation. No employees, not even the highest ranking individuals in the Company, are exempt from the requirements of this policy. All employees are expected to report conduct they believe might violate this policy through one of our reporting mechanisms.

H. Reporting Prohibited Conduct

All employees must, as permitted by law, immediately report any possible violation of this policy using the reporting procedure described below.

Employees have several individuals to whom they can report potential violations of this policy, including any Human Resources ("HR") Business Partner, their manager, or any of the following members of the HR or Legal Departments or the Ethics and Compliance Office:

<p>Seth Krauss Chief Legal Officer, Global General Counsel, and Interim Chief Human Resources Officer</p>	<p>skrauss@endeavorco.com +1 (646) 558-5308 200 5th Avenue, 7th Floor New York, NY 10007</p>
<p>Elyse Kazam Senior Vice President, Human Resources</p>	<p>ekazam@endeavorco.com +1 (212) 774-4404 304 Park Avenue South, 10th Floor New York, NY 10010</p>
<p>Melisa Miller Executive Vice President, Chief People Officer</p>	<p>Melisa.Miller@endeavorco.com +1 (646) 871-2544 304 Park Avenue South, 10th Floor New York, NY 10010</p>
<p>Angelina Ng Vice President, Human Resources, APAC</p>	<p>ang@endeavorco.com No 1 Scott's Road #19-01 to 05 Shaw Centre Singapore 228208 Central Singapore</p>
<p>Ashley Page Chief Compliance Officer, Associate General Counsel</p>	<p>APage@endeavorco.com +1 (470) 378-0706 3475 Lenox Road NE, Suite 1000 Atlanta, GA 30326</p>
<p>Courtney Braun General Counsel, Client Representation, Endeavor and EVP and Co-Head of Litigation, Endeavor</p>	<p>cbraun@endeavorco.com +1 (310) 248-3017 9601 Wilshire Blvd., 5th Floor Beverly Hills, CA 90210</p>
<p>Hayley Macon Senior Vice President & Associate General Counsel, Employment - Americas</p>	<p>hmacon@endeavorco.com +1 (310) 550-3411 304 Park Ave South New York, NY 10010</p>

<p>Gagandeep Prasad Senior Vice President & Associate General Counsel, Employment – EMEA & APAC</p>	<p>gprasad@endeavorco.com +44(0)7468 697843 566 Chiswick High Rd., Bldg 6. London W4 5HR</p>
<p>Anna Malins Vice President & Counsel, Employment - APAC</p>	<p>amalins@endeavorco.com +61 (2) 92602369 MLC Centre Level 25, 19 Martin Place Sydney NSW 2000</p>

Along with any HR Business Partner, these are the individuals authorized by and required under this policy to receive and act upon complaints of discrimination, harassment, and retaliation on behalf of the Company as appropriate in accordance with “Company Response” below.

Alternatively, employees may make such a report using the Endeavor Ethics Helpline, which provides the ability to make a report 24 hours a day/7 days a week in multiple languages. Reports will be treated confidentially to the extent practicable and may be made anonymously where permitted by law. Reports to the Endeavor Ethics Helpline may be made by:

- (1) U.S. toll-free telephone: (+1) (877) 537-8586. For easy access to other country specific dialing instructions, please visit <http://www.endeavor.ethicspoint.com>; or
- (2) Web-based reporting tool, available by visiting <http://www.endeavor.ethicspoint.com>.

Please note that local data protection and privacy restrictions may limit the use of the [Endeavor Ethics Helpline](#) in certain jurisdictions.

This policy does not require reporting discrimination, harassment, or retaliation directly to an employee's immediate supervisor or to any individual who is engaged in the harassing, discriminatory or retaliatory behavior. Complaints or reports of incidents involving a threat of violence or act of violence, including sexual assault and battery, must be elevated to one of the individuals listed above, as well as local law enforcement, as appropriate.

I. Company Response

All reports describing conduct that is inconsistent with this policy will be investigated promptly. To that end, parties involved in the situation (including the reporting party, anyone identified as

the target of the behavior (if different than the reporting party) and anyone who allegedly violated this policy) will be offered an opportunity to be interviewed or to otherwise respond to a report under this policy. The Company might put certain interim measures in place, such as a leave of absence or a transfer, while the investigation proceeds, depending on the circumstances. Endeavor will take further appropriate action once the report has been investigated. That action may be a conclusion that a violation occurred, as explained immediately below. The Company might also conclude, depending on the circumstances, either that no violation of policy occurred or that the Company cannot conclude whether or not a violation occurred.

If an investigation reveals a violation of this policy or other inappropriate conduct has occurred, then Endeavor will take corrective action, including discipline up to and including termination of employment, reassignment, changes in reporting relationships, training, or other measures the Company deems appropriate under the circumstances, regardless of the job positions of the parties involved. The Company may take corrective action for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If the person who engaged in harassment is not employed by the Company, then the Company will take corrective action that is reasonable and appropriate under the circumstances.

If a supervisor or manager knowingly allows sexual harassment or another form of harassment to continue, or fails to report such conduct, the Company will also take corrective action against the supervisor or manager, including discipline, up to and including dismissal.

J. Policy Against Retaliation

Endeavor forbids that any employee treat any other employee or former employee or applicant adversely for reporting harassment, discrimination, or retaliation, for assisting another employee or applicant in making a report, for cooperating in an investigation into such alleged conduct, for issuing a claim with any relevant court or government agency, or for testifying or assisting in any proceeding under the law. All employees who have experienced or witnessed any conduct they believe to be retaliatory are to immediately follow the reporting procedures stated above.

K. Confidentiality

Investigations will be kept as confidential as possible and, where appropriate, information relating to the investigation will be shared with only those with a need to know in order to facilitate the investigation or its resolution.

Breach of confidentiality may give rise to disciplinary action. Information about a complaint by or about an employee may be placed in the employee's personnel file or other company file,

along with a record of the outcome and of any notes or other documents compiled during the process.

These will be processed in accordance with any applicable Company data protection/privacy policy.

POLICY AGAINST ABUSIVE CONDUCT AND BULLYING

Working together sometimes brings about conflict. That said, we expect all Endeavor employees to respect each other and to act professionally at all times. Under no circumstances should employees verbally abuse, humiliate, threaten, or bully co-workers, clients, vendors, contractors or others who provide services to the Company. This policy prohibits abusive conduct or bullying, as defined below. This policy applies in the workplace, at other locations where Company business is being performed (e.g., during work-related travel, etc.), and at all work-related events and activities.

Although the term bullying may have a specific definition under applicable local laws, abusive conduct and bullying generally refers to any conduct in the workplace that a reasonable person would find hostile, offensive, and in conflict with the Company's legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance.

Abusive conduct and bullying creates a negative work environment that is counterproductive. Such behavior is a serious offense and violates Company policy.

If you believe you have witnessed or been subjected to abusive conduct, you should immediately report the conduct using the complaint procedures described in the Policy Against Sexual and Other Workplace Harassment. You will not be subject to retaliation for reporting abusive conduct or participating in an investigation into allegations of abusive conduct. Individuals who violate this policy are subject to disciplinary action, up to and including termination of employment.

WORKPLACE SECURITY, SAFETY, AND HEALTH

The safety and security of our employees is of paramount importance. Thus, the Company is committed to taking reasonable measures to create a safe workplace that is free from acts of violence or threats of violence. In keeping with this commitment, we have established a strict policy that prohibits employees, consultants, customers, clients, vendors, suppliers, visitors or anyone else on Company premises or engaging in a Company-related activity from threatening or committing any act of violence in the workplace, while on duty, while on Company-related business, while operating any vehicle or equipment owned or leased by the Company, or while

on Company property. This policy applies to all employees, including managers, supervisors, and nonsupervisory employees, and to the other individuals identified above.

As part of this policy, the Company seeks to prevent workplace violence before it begins and reserves the right to deal with behavior that suggests a propensity towards violence, even prior to any violent behavior occurring. The Company believes that prevention of workplace violence begins with recognition and awareness of potential early warning signs and will respond to any situation that presents the possibility of violence.

Workplace violence includes:

- Threats of any kind;
- Threatening, physically aggressive or violent behavior, including intimidation of, or attempts to instill fear in, others;
- Spitting at others;
- Defacing Company or employee property, or causing physical damage to such property;
- With the exception of security employees with the express permission from the Chief Legal Officer and Chief Human Resources Officer, bringing weapons or firearms of any kind on Company premises, or while conducting Company business, consistent with applicable law;
- Harassing or threatening phone calls;
- Stalking; or
- Other behavior that suggests a propensity toward violence, which can include belligerent speech, excessive arguing or swearing, sabotage or threats of sabotage of Company or employee property.

In order to achieve our goal of providing a workplace that is secure and free from violence or threats of violence, we must enlist the support of all employees. Compliance with this policy and the Company's commitment to a "zero tolerance" policy with respect to workplace violence is every employee's responsibility.

Employees are required to report any incident involving a threat of violence or act of violence immediately to Endeavor Security, Human Resources, the Legal Department or the Employment Law Department.

Alternatively, the employee may make such a report using the Endeavor Ethics Helpline, which provides the ability to make a report 24 hours a day/7 days a week in multiple languages. Reports will be treated confidentially to the extent practicable and may be made anonymously where permitted by law. Reports to the Endeavor Ethics Helpline may be made by:

(1) U.S. toll-free telephone: (+1) (877) 537-8586. For easy access to other countryspecific dialing instructions, please visit <http://www.endeavor.ethicspoint.com>; or

(2) Web-based reporting tool, available by visiting <http://www.endeavor.ethicspoint.com>.

Please note that local data protection and privacy restrictions may limit the use of the [Endeavor Ethics Helpline](#) in certain jurisdictions.

Complaints or reports received of incidents involving a threat of violence or act of violence, including sexual assault and battery, will be elevated to the Chief Legal Officer and Chief Human Resources Officer.

To be clear, while such incidents must be reported, if you become aware of an emergency situation involving immediate danger or threat of violence of any kind, your first responsibility is to notify the local authorities. The Ethics Helpline is not an emergency service, nor should it be treated as the equivalent of calling the emergency services. If you require emergency assistance, please contact local authorities.

Further, employees must utilize the reporting process in the Policy Against Sexual Harassment and other Workplace Harassment if any restraining order is in effect that impacts the workplace, or if a potentially violent non-work-related situation exists that could result in violence in the workplace.

All reports of workplace violence will be taken seriously and will be investigated promptly and thoroughly. In appropriate circumstances, the Company will inform the reporting individual of the results of the investigation. To the extent possible, the Company will maintain the confidentiality of the reporting employee and of the investigation, but may need to disclose

results in appropriate circumstances including to law enforcement. The Company will not tolerate retaliation against any employee who reports workplace violence.

If the Company determines that workplace violence has been threatened or has occurred, the Company will take appropriate corrective action, up to and including termination of employment. The Company will also inform law enforcement of any workplace violence incident and will fully cooperate with law enforcement. If the violent behavior is that of a non-employee, the Company will take appropriate corrective action, including notifying law enforcement and security, in an attempt to ensure that such behavior is not repeated.

SOCIAL AND ROMANTIC RELATIONSHIPS POLICY AND EMPLOYMENT OF RELATIVES

The Company believes all supervisors and managers have an obligation to conduct themselves professionally at all times, including when they are in the presence of other employees when not working. Endeavor wishes to avoid the misunderstandings, actual or perceptions of favoritism, possible sexual harassment claims, adverse impact on employee morale, and disruption to the workplace that can result from frequent socializing or from intimate, dating or sexual relationships between a superior and a subordinate.

For these reasons, the Company discourages dating, romantic or sexual relationships between managers or supervisors and any employee in their direct reporting line. If a romantic relationship between a manager and *any* employee should develop, it is the responsibility and mandatory obligation of the manager to promptly disclose the existence of this relationship to his or her manager and Human Resources. The employee involved may make a disclosure as well, but the burden of disclosure is on the manager. If a manager fails to disclose a romantic relationship and it is discovered through other sources, the manager may be disciplined, up to and including termination of employment.

Company managers must avoid these situations by showing good judgment and conducting themselves professionally at all times when they are in the presence of other Endeavor employees.

If a relationship is reported between a manager or supervisor and any employee in their direct reporting line, the Company may consider appropriate action to address any actual or potential conflict of interest or other business issue to which the relationship may give rise in consultation with the individuals concerned. If an intimate or dating relationship or excessive fraternization between a manager and an employee not in a direct reporting line has an effect on the job performance of either of them or negatively affects the business interests of the Company, both the supervisor and the subordinate could be subject to disciplinary action up to and including termination of employment.

Similarly, the Company wishes to avoid the same issues with respect to familial relationships and will therefore, carefully examine the circumstances surrounding employment of relatives.

In some circumstances, it may be necessary for Endeavor to consider corrective measures when, in its determination, any personal relationship, whether romantic or not and whether or not between a superior and subordinate, causes disruption to or has a negative effect on the work environment, creates a conflict of interest, or presents concerns regarding supervision, safety, security, or morale. Such corrective measures would not be taken without full and proper investigation.

DRUG AND ALCOHOL WORKPLACE RULES

Whenever employees are working, present on Company premises, or present in any other location performing services for the Company, they are prohibited from:

- Using, possessing, buying, selling, manufacturing, distributing, dispensing or transferring illegal drugs;
- Asking colleagues (including superiors, peers, and subordinates) to use, buy, procure, distribute, dispense, or transfer drugs that are illegal in the jurisdiction where either colleague is working, either temporarily or permanently; and
- Being under the influence of illegal drugs or impaired by the use of alcohol or legal drugs.

Employees should report to work fit for duty and free of any adverse effects of drugs (both legal and illegal) or alcohol.

Employees may possess and consume alcohol provided by the Company at authorized Company functions or in certain legitimate business settings such as client entertainment. At all such times, however, employees are expected to act responsibly and to drink moderately (not to the point that they are impaired).

This policy does not prohibit employees from the lawful possession and use of prescribed medications. Employees have the responsibility to consult with their doctors or other licensed health care professionals about the effect of prescribed medications on their ability to perform their specific job duties in a safe manner, and to promptly disclose any work restrictions to the Company's appointed physician (if applicable), their supervisors or to Human Resources, to the extent required or permitted by applicable law. Employees should not, however, disclose underlying medical conditions, impairments or disabilities to their supervisors or to Human

Resources, except in specific circumstances where a medical condition may impact on their ability to perform their role safely or unless specifically directed to do so by their doctors or other licensed health care professionals.

Consequences

Employees who violate this policy will be subject to appropriate disciplinary action up to and including termination of employment. Depending on the circumstances and subject to compliance with local law, an employee's continued employment may be conditional upon the employee's successful participation in and/or completion of any and all evaluations, counseling, treatment, and rehabilitation programs, passing of return-to-duty and follow-up drug and alcohol tests, and/or other appropriate conditions as determined by the Company.

General

This policy does not form any part of any contract of employment or otherwise have a contractual effect. However, compliance with the policy is mandatory notwithstanding its non-contractual effect. We may amend or withdraw the policy at any time, in accordance with any applicable laws.

If you have any difficulty with any policy or procedure because of a disability or because English is not your first language, you should speak to Human Resources.