



## **ANTI-BRIBERY AND CORRUPTION POLICY**

Any questions about this Policy or potential compliance issues should be promptly reported to 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>.

### Policy

CEC Entertainment, LLC and its subsidiaries (collectively referred to as the “Company”) strictly prohibit engaging in or tolerating bribery or any other form of corruption by a director, officer, employee, or any other person working for or on behalf of the Company (referred to herein as “You”).

You must not give or promise, directly or indirectly, money or anything of value to any person for improper purposes, including for the purpose of obtaining or retaining business for the Company, inducing that person or any other person to act, rewarding him/her for acting, or securing an advantage, improperly or otherwise.

You also must not solicit or accept, directly or indirectly, money or anything of value from any person for improper purposes, including for the purpose of assisting that person in improperly obtaining or maintaining a business relationship with the Company.

### Scope

This policy applies to dealings with government officials, business partners, and employees. In many cases, local prohibitions and requirements regarding government and other public officials will be stricter than those applicable to non-government business partners and employees. When dealing with government officials, You must be aware of any requirements and prohibitions applicable to such officials.

This policy prohibits conveying anything of value either directly by You or indirectly through agents, contractors, intermediaries, franchisees, or other third parties. Providing benefits to family members is also prohibited.

This policy applies even if a person, including a government official, demands or suggests the payment. If You receive a demand or suggestion, no payment should be made and You should immediately report it to your supervisor, the Chief Compliance Officer, or in the manner provided

in the Company's Code of Business Conduct and Ethics ("the Company Code") in the section titled "Reporting Any Illegal or Unethical Behavior."

This policy covers the circumstances under which gifts, meals, entertainment and other forms of hospitality may be appropriate. As described below, it is important to recognize that the law and rules for giving or receiving such items are different for a government official than they are for a private person. Also, such items should never be given or received with such frequency that it appears that an effort is being made to avoid restrictions under local law or this policy.

### Key Concepts

You must be familiar with and understand the meaning of the following:

Anything of Value: This term is broadly defined to include money or cash, travel, gifts, favors, services, loans and loan guarantees, investment or business opportunities, the use of property or equipment, job offers (including to a person's relative), internships, transportation, the payment or reimbursement of debts, and other payments, as well as anything else of value.

Bribery: Offering, promising, giving, or accepting Anything of Value in an attempt to influence a person's actions or decisions in order or to improperly gain or retain a business advantage. For the avoidance of doubt, Bribery includes Facilitation Payments as well as Kickbacks.

Facilitation Payment(s): Also known as "Speed" or "Grease" payments, are typically small sums paid to government officials to facilitate or expedite routine, non-discretionary government actions.

Government official: Is defined broadly and includes (domestic and foreign): (i) Any officer or employee of a government-owned or government-controlled company, including companies that operate in the commercial sector but are owned by a government or government agency; (ii) Any person engaged in public duty in a government agency, including any elected or appointed official or employee of a government, at any level; (iii) Any officer or employee of a public international organization (such as the United Nations, the World Bank or the International Monetary Fund); (iv) Any person acting in an official capacity for a government, government agency, or state-owned enterprise (for example, someone who has been given authority by a government entity to carry out official responsibilities); (v) Any political party, official of a political party, and any candidate for political office; and (vi) A family member, spouse, or domestic partner of any of the persons described in clauses (i)-(v) above.

Kickbacks: Typically, payments made between business contacts in return for a business favor or advantage.

### Bribery

Bribes are usually designed to obtain financial benefits or other personal gain. For example, bribes are intended to influence behavior – they could be in the form of money, a

privilege, an object of value, an advantage, or merely a promise to influence a person in an official or public capacity. Usually, two people are involved and both will benefit. Examples of a Bribe include:

1. Offer or receipt of cash in the form of a kickback, loan, fee or reward; and
2. Giving of aid, donations or voting designed to exert improper influence.

The areas of business where corruption, including bribery, can most often occur include:

1. Gifts, Entertainment and Hospitality;
2. Facilitation Payments;
3. Procurement Process; or
4. Political, Community and Charitable Contributions.

### Accounting

The Company is required to maintain books and records that accurately and fairly reflect all transactions. Therefore, you must ensure that any and all entries that you make or cause anyone one to make are accurate. The Company also requires accounting for transactions in sufficient detail so that improper payments cannot be hidden from detection and review. If you make or cause another to make any false entry in the Company's books and records, or are a party to the creation of any false or misleading document that supports the disbursement of funds, You shall be subject to disciplinary action, up to and including termination.

For more detail on the Company's policy relating to record retention, refer to the Code of Business Conduct and Ethics.

### Gifts

You may not give or receive gifts in connection with the Company's business except in accordance with this policy.

No gift may be given to a government official unless specifically allowed by written local law and you have received prior written approval from the Chief Compliance Officer.

You may give or receive a gift from a private person without prior approval from the Chief Compliance Officer only if all of the following circumstances are met:

- the gift is appropriate under legitimate and generally accepted local law and custom;
- the gift is permitted by the rules of the recipient's employer;

- the item is of nominal value (under US\$150.00 per calendar year) (examples include logo cups, hats, shirts, USB drives, calendars and notebooks which bear a company or other official logo); and
- the expenses related to the gift are supported by receipts, approved in accordance with the Company policies, and accurately recorded in the Company's books and records. In the event that a cash advance is obtained to pay for a permissible gift, appropriate documentation of the expense must be maintained and submitted pursuant to the Company's Business Expense and Travel Policy.

You must receive prior written approval from the Legal department before you accept any other types of gifts.

### Entertainment and Hospitality

The Company recognizes that normal entertainment and hospitality, including meals and refreshments, are accepted practices, but certain persons, like government officials, are subject to limitations on what they may accept or offer.

Before You offer or receive any entertainment or hospitality, including meals and refreshments, You should ask yourself:

- Does it legitimately support our business?
- Is it reasonable, proportionate, and customary?
- Could it be viewed as an attempt to improperly influence a business decision or government action?
- Would this embarrass You or the Company if it was on the front page of the newspaper?
- If You are unsure of the answer to any of these questions, You must seek guidance from your supervisor or the Chief Compliance Officer.

Entertainment or hospitality expenses, including meals and refreshments, are never permissible, regardless of the amount, if the purpose of incurring them is to improperly influence a decision by a government official, including an official who is involved in regulatory inspections, reviews, or approvals involving the Company's business.

You may give or receive business entertainment or hospitality, including meals and refreshments, without prior approval from the Chief Compliance Officer only if all of the following conditions are met:

- the main purpose of the meeting at which the meal, refreshments or entertainment is provided is discussion of specific projects or opportunities or education regarding

the Company's products, and the meeting is attended by the appropriate Company representatives;

- the meal, refreshments or entertainment is permitted by local law and custom, as well as the rules of the recipient's employer; and
- the cost of the meal, refreshments or entertainment is:
  - less than \$25 or the equivalent in another currency for a government official; and
  - less than \$150 or the equivalent in another currency for a private person.

You must receive prior written approval from the Chief Compliance Officer before you accept any other forms of business entertainment or hospitality, including meals and refreshments.

#### Sponsored Travel by Customers, Suppliers and Other Business Partners

In appropriate circumstances, with advance written approval from the Chief Compliance Officer, the Company may pay reasonable and bona fide expenditures, such as travel and lodging expenses, incurred by or on behalf of an actual or potential business partner where the expenditures are directly related to the promotion, demonstration, or explanation of the Company's products or services or the Company's performance of a contract with such business partner.

#### Use of Agents, Consultants, and Other Third Parties

The Company occasionally engages third parties to act on its behalf, including agents, sales representatives, distributors, contractors, finders, consultants, business partners, or other third parties (referred to in this policy as "Agents"). It is vitally important that the Company know who they are and what they are doing on our behalf. Agents also must understand that they are required to comply with the Company's standards for preventing bribery and corruption—Code of Business Conduct and Ethics for Business Partners which can be found under "Governance" on our web page at <https://www.chuckecheese.com/company/investor-relations>.

Before entering in an agreement with an Agent, "due diligence" must be conducted. This typically should include collecting information about the potential Agent to determine if he or she is qualified for the position, whether he or she has personal or professional ties to the government, the number and reputation of his or her clientele, and his or her reputation with clients and business associates. A due diligence checklist is included as Appendix I.

Every agreement with an Agent must be in writing and approved in advance in writing by the Chief Compliance Officer. The agreement must require that the Agent comply with the Company's Code of Business Conduct and Ethics for Business Partners, this Anti-Bribery and Corruption Policy, and any applicable anti-corruption laws. In addition, all Agents must sign the certification attached hereto as Appendix II.

Finally, You must be alert to and report to your supervisor any “red flags” or warning signs involving an Agent during the course of the relationship. Examples of “red flags” include unusual payment patterns or financial arrangements, prior allegations or charges of corruption, a refusal by the Agent to sign a Certification of Compliance with this policy, unusually high commissions, lack of transparency in expenses and accounting records, apparent lack of qualifications or resources on the part of the Agent to perform the services offered, and whether the Agent has been recommended by an official of the potential government customer.

#### Facilitating, “Speed” or “Grease” Payments

Facilitation Payments are not allowed. Although some anti-bribery laws permit payments to government officials in limited circumstances for the purpose of facilitating or expediting the administrative performance of routine governmental actions, the Company strictly prohibits such payments by its directors, officers, employees, and Agents. If you are unsure whether certain payments represent Facilitation Payments, please contact the Chief Compliance Officer as soon as possible.

#### Procurement Process

You must follow Company processes and adhere to the system of internal controls relating to supplier selection. Supplier selection should never be based on receipt of a gift, hospitality or payment. When supplier selection is a formal, structured invitation for the supply of products or services (often called a “bid”), it is most important that we maintain documentation supporting our internal controls. In the public sector, such a bid process may be required and determined in detail by law to ensure that such competition for the use of public money is open, fair and free from corruption.

A bid process includes an invitation for other parties to make a proposal, on the understanding that any competition for the relevant contract must be conducted in response to the tender, no parties having the unfair advantage of separate, prior, closed-door negotiations for the contract where a bidding process is open to all qualified bidders and where the sealed bids are in the open for scrutiny and are chosen on the basis of price and quality.

#### Political Community and Charitable Contributions

You are not allowed to make political contributions from Company funds without authorization (which includes but is not limited to, expensing such contributions on your expense report). Political contributions, as permitted by law, must be approved in advance by our Chief Compliance Officer.

Contributions made by the Company to community projects or charities need to be made in good faith and in compliance with our Code of Business Conduct and Ethics and this Policy and all relevant Company policies and procedures. All such contributions must be approved in accordance with the Company policies, and accurately recorded in the Company’s books and records.

## Training

The Company recognizes the importance of providing training to directors, officers, and employees who are likely to interact with government officials or business partners. The Company will provide and You are required to undertake appropriate training on this policy and the related legal issues on an annual basis if your job responsibilities include these types of interactions.

## Disciplinary Action for Failure to Comply

Any and all Company directors, officers, and employees who fail to comply with this policy or any applicable anti-corruption laws, will be subject to disciplinary action, up to and including termination.

## Responsibility for Policy and Periodic Review

The Chief Compliance Officer is assigned overall responsibility for this policy; however, every director, officer and employee of the Company has a responsibility to follow the policy and to be alert to potential violations by others. This policy will be reviewed and evaluated periodically to ensure that it is aligned with and addresses risks the Company faces. The Company's Internal Audit department will conduct periodic internal assessments and audits to ensure compliance with this Policy.

## Raising Questions and Reporting Concerns

Any questions about this policy or its application to any particular set of facts should be referred to the Chief Compliance Officer.

If You see or hear about a potential violation of this policy by a director, officer, employee, or Agent in connection with the Company's business, You must not "close your eyes" to the issue.

Your supervisor is usually a good place to start with a compliance or integrity issue. You may also get help or advice from your supervisor's supervisor, the head of your department or location, the Legal or Human Resources department. Additionally, you may report violations or potential violations of applicable laws, rules and regulations or of our codes, policies and procedures, by (1) calling our Compliance Hotline at 1-800-789-5216 or (2) our dedicated and secure reporting website, which is located at <https://cecenterertainment.ethicspoint.com>.

The Company will not tolerate retaliation against anyone who in good faith raises concerns about possible violations of this policy and no adverse employment action will be taken against You for reporting possible violations in the manner described in the Company Code.

## Appendix I

### Third Party Due Diligence Checklist

The following checklist provides an illustrative, but not exhaustive, list of steps that can be used to evaluate agents, sales representatives, distributors, contractors, finders, consultants, business partners or other third parties (referred to herein as an “Agent”):

- Complete the Anti-Bribery and Corruption Due Diligence Questionnaire (the “Questionnaire”) for the Agent, which is attached as Appendix III to this Policy;
- Obtain and check references from prior parties that have worked with the Agent;
- Conduct an in-person interview with the Agent, preferably at his or her place of business;
- Provide the potential Agent with anti-corruption briefing, instruction and training, as appropriate;

Depending on the nature of the work, the Agent will perform for the Company, as well as other relevant factors such as geographic location, the following additional steps may be undertaken in consultation with the Chief Compliance Officer:

- o Search public records regarding all relevant persons and entities identified in the Questionnaire (e.g., employees, owners, officers, or directors of the Agent).
- The records should be searched for any criminal record or bankruptcies for the relevant persons and to determine that no relevant persons are on lists of designated or denied persons, terrorist watch lists, or similar designations
  - o Commission a background check utilizing a private investigator, outside counsel, or an outside forensic accounting firm, as appropriate.



## Appendix II

### Certification of Compliance

I acknowledge that I have reviewed the Company's Anti-Bribery and Corruption Policy (the "Policy") and understand that I have an obligation to fully adhere to these policies and principles. In particular, I acknowledge and affirm that:

In carrying out my responsibilities on behalf of the Company, I agree that I have not, and will not, and will ensure that no person acting on my behalf or at my direction will, offer, promise, pay, or give, or authorize the offer, promise, payment, or giving of, any financial or other advantage, including money or anything of value, whether by direct or indirect means, to any person for the purpose of obtaining or retaining business, inducing that person or any other person to act, rewarding him/her for acting, or securing an improper advantage, improperly or otherwise.

I also certify that I have no knowledge that I or anyone acting on my behalf or at my direction has engaged or is engaging in such activities.

I understand that the Company may terminate its relationship with me if I fail to follow the requirements listed in the Policy, this Certification or in my agreement with the Company.

By: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix III

### Anti-Bribery and Corruption Due Diligence Questionnaire

CEC Brands, LLC and its subsidiaries (collectively, the “Company”) requires that this Questionnaire be completed and reviewed for any Agent of the Company as that term is defined in the Company’s Anti-Bribery and Corruption Policy (“ABC Policy”). This Questionnaire reflects our commitment to fight any corrupt and unethical practices in the course of conducting our business and is intended to minimize our risk exposure as a result of activities carried out by an Agent on our behalf.

Please have the Agent complete the following questionnaire completely and truthfully to the best of their ability. The completion of this Questionnaire is one of the steps in the review process.

#### Instructions

Please provide answers to all of the questions. Some answers may simply consist of a “Yes or No”. Please do not omit any question. If a question is not applicable, write “N/A” in the space provided. If the space provided for a question is insufficient, you may attach additional pages.

#### Data Protection Statement

You are completing this Questionnaire because the Company is considering entering into a business relationship with you. The information collected through the Questionnaire and from other sources (e.g. the references and other parties) will not be used or processed for any other purposes. If you need to amend or correct the information that you have provided to the Company, please inform your business contact.

#### Definitions

For the sake of clarity, we have provided explanations of key concepts:

“Applicant” refers to \_\_\_\_, and all of its affiliated companies in which \_\_\_\_\_ owns, directly or indirectly, more than fifty percent (50%) of the voting shares.

"Facilitation Payments" also known as “Speed” or “Grease” payments, are typically small sums paid to government officials to facilitate or expedite routine, non-discretionary government actions.

“Government” Is defined broadly and includes (domestic and foreign): (i) Any officer or employee of a government-owned or government-controlled company, including companies that operate in the commercial sector but are owned by a government or government agency; (ii) Any person engaged in public duty in a government agency, including any elected or appointed official or employee of a government, at any level; (iii) Any officer or employee of a public international organization (such as the United Nations, the World Bank or the International Monetary Fund); (iv) Any person acting in an official capacity for a government, government agency, or state- owned enterprise (for example, someone who has been given authority by a

government entity to carry out official responsibilities); (v) Any political party, official of a political party, and any candidate for political office; and (vi) A family member, spouse, or domestic partner of any of the persons described in clauses (i)-(v) above.

Please see the Company’s ABC Policy and its Code of Business Conduct and Ethics for Business Partners for more information. Both policies can be found under the “Governance” link at <https://investor.cecenterertainment.com/>.

**1.0 COMPANY INFORMATION**

1.1 General Information. Please review and update the below as needed.

|   |                              |                            |
|---|------------------------------|----------------------------|
| <b>Registered Company Name:</b>                             |                              |                            |
| <b>Registration Number:</b>                                 | <b>Country where formed:</b> | <b>Date formed</b>         |
| <b>Group of Companies with which company is associated:</b> |                              |                            |
| <b>Principal Business Address:</b>                          |                              | <b>Registered Address:</b> |
| <b>Contact Name:</b>  |                              | <b>Contact Details:</b>    |
| <b>Website:</b>   | <b>Total Assets:</b>         |                            |

1.2 Country of Operations

|  |
|--|
|  |
|--|

**2.0 INCORPORATION, OWNERSHIP AND EMPLOYEE INFORMATION**

2.1 Is the Applicant an entity, such as a corporation, partnership, non-profit organization, joint venture, subsidiary, sister company, government entity, NGO, etc. (‘Entity’)?  
 Yes  No

2.2 Please list all shareholders or owners who hold a financial interest in the Applicant’s business of 10% or more. Where applicable, please provide ownership information that identifies all individual owner of Applicant (or major shareholders if a public company).

| Owner Name | % Ownership | Address | Country of Incorporation/<br>Nationality |
|------------|-------------|---------|--|
|            |             |         |  |

2.3 Has the Applicant changed its business name in the last five (5) years?

Yes  No

**3.0 SERVICES**

Please answer the following about the services the Company will perform on behalf of the Applicant

3.1 Please state how long the Applicant been in business in its home jurisdiction and how long it has been providing the services similar to the proposed services to be performed by the Company?

>5 years  5 – 10 years  10 – 15 years  15 - 20 years  > 20 years

3.2 Please describe in detail the nature of services that you expect the Company to perform.

**4.0 GOVERNMENT**

4.1 Does the Applicant have any owners, shareholders, or other key personnel (or any affiliated entity) government officials or have connections (family, business, or otherwise) with government officials?

Yes  No

4.2 Identify who is or was the public official or who has connections a current or former public official

**Government Connections/Relations**

| Are any owners, management or employees connected with a current or former Government Official? If yes, please detail: |              |                      |                     |                        |
|--|--------------|----------------------|---------------------|------------------------|
| Person Name  | Person Title | Public Official Name | Government Position | Relationship to Public |
|  |              |                      |                     |                        |

**5.0 VIOLATIONS**

5.1 Within the last five (5) years, has the Applicant, or any of its directors, officers, principal owners or employees, ever been found by a court or agency to have violated any anti-bribery laws or securities laws?

Yes  No

If yes, please provide details:

5.2 Within the last five (5) years, has the Applicant or any of the principal officers, directors or shareholders ever been investigated or charged with any offense, including bribery, conflicts of interest, corruption, kick-backs, or money-laundering?

Yes  No

If yes, please provide details:

5.3 Has the Applicant ever paid money or given anything of value to a Government Official in order to retain business or obtain an improper advantage in any jurisdiction?

Yes  No

If yes, please provide details:

5.4 Has the Applicant ever been suspended or debarred from doing business in any capacity as a result of fraud, misrepresentation, corruption, bribery, money laundering or any other related activities in any jurisdiction?

Yes  No

If yes, please provide details:

5.5 Has the Applicant ever made any public disclosures involving fraudulent or corrupt misconduct or improper accounting to any government authority?

Yes  No

If yes, please provide details:

**6.0 COMPLIANCE SYSTEM AND ANTI-CORRUPTION PREVENTION**

Policies and Procedures. Please answer the following regarding your policies and procedures.

6.1 Is Applicant familiar with the prohibitions of the U.S. Foreign Corrupt Practices Act?

Yes  No

6.2 Does the Applicant have an Anti-Corruption Policy?

Yes  No

6.3 Does the Applicant have procedures in place to monitor the effectiveness of its anti-corruption policy?

Yes  No

6.4 Does Applicant provide training of anti-bribery laws to its employees?

Yes  No

6.5 Does Applicant have procedures in place to allow reporting of any misconduct?

Yes  No

6.6 Does Applicant allow facilitation payments?

Yes  No

6.7 Does the Applicant have a Code of Conduct?

Yes  No

## 7.0 CERTIFICATION

The Applicant, who is duly authorized and has full legal capacity to complete this Questionnaire, certifies as to the matters set forth in this Questionnaire, signs and certifies this document as follows:

- a) to the best of my knowledge, all information set forth in this response is accurate and complete;
- b) I have read and understood the Data Protection statement above and expressly consent to the collections, use, processing, storage and transfer of data, including the data about my company, my personally identifiable information and that of other persons that I identify in the Questionnaire, in the manner and for the purposes described in this Questionnaire and in the Data Protection statement.
- c) I acknowledge and understand that the provision of false or misleading information may result in the termination of any relationship that may be entered into in the future between me and/or my company and the Company. Further, I understand that the Company reserves the right to any and all remedies as may be appropriate in the event of such termination.

**Do you certify to the above statements?**

Yes  No

|            |           |
|------------|-----------|
| Name:      | Position: |
| Signature: | Date:     |