

CODE OF BUSINESS CONDUCT



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Note: This Code and related policies are current as of August 13, 2025. In adopting and publishing these guidelines, you should note that (1) in some respects our policies may exceed minimum legal requirements or industry practice, (2) nothing contained in this Code should be construed as a binding definition or interpretation of a legal requirement or industry practice, (3) any action by our employees or agents in violation of the law or this Code is beyond the scope of such person's authority or duty and is not an act by us or on our behalf and (4) this Code is not an employment contract and does not modify the employment relationship between Cinemark and you. We do not create any contractual rights by issuing these policies, and we reserve the right to amend, alter and terminate policies at any time as circumstances warrant.

To obtain copies of this Code, you may contact the Human Resources Department or access it from the web at <http://ir.cinemark.com/corporate-governance/governance-documents>.

OUR VALUES – HOW WE DO EVERYTHING

DO THE RIGHT THING

We act with honesty and integrity.

PASSION FOR PEOPLE

We respect and care for each other, our guests, communities, and partners, promoting a positive and inviting environments for all.

STRIVE FOR EXCELLENCE

We continuously challenge the status quo, embrace innovation, and aim to excel in all we do.

SAFETY FIRST

We provide clean and safe environments for our employees and guests.

OWN IT

We empower our people to own their roles and take accountability, because every detail matters.

STAY PRUDENT

We maintain an unwavering commitment to operational discipline and profitable growth.

LETTER FROM THE CEO



TO ALL EMPLOYEES,

Our company is founded on our commitment to the highest ethical principles and standards. We value honesty and integrity above all else. Upholding these commitments is essential to our continued success.

The law and the ethical principles and standards that comprise this Code must guide our actions. The Code is, of course, broadly stated. Its guidelines are not intended to be a complete listing of detailed instructions for every conceivable situation. Instead, it is intended to help you develop a working knowledge of the laws and regulations that affect your job.

Adhering to this Code is essential. I have personally taken the time to study it carefully and I encourage you to do the same. I have also signed a statement confirming that I have read this Code carefully, and I expect you to do the same.

Ultimately, our most valuable asset is our reputation. Complying with the principles and standards contained in this Code is the starting point for protecting and enhancing that reputation.

Thank you for your commitment!

Sincerely,

A handwritten signature in black ink, appearing to read 'Sean Gamble', written in a cursive style.

Sean Gamble

President and Chief Executive Officer



ABOUT OUR CODE OF BUSINESS CONDUCT

OUR CODE IS A GUIDE

Cinemark's Code of Business Conduct (the "**Code**") sets standards based on our values, policies and applicable laws and regulations.

Several provisions in this Code refer to more detailed policies that either (1) concern more complex company policies or legal provisions or (2) apply to select groups of individuals within our company. They can be found in the Workday Policy Library. If these detailed policies are applicable to you, it is important that you read, understand, and are able to comply with them. If you have questions as to whether any detailed policies apply to you, contact your supervisor, your Human Resources business partner, or our Ethics and Compliance Officer, who is a member of the Legal Department. If you are unsure who to contact, please call the Company's corporate offices at (972) 665-1000.

Situations that involve consideration of ethics, values and compliance with certain laws are often very complex.

No single code of conduct can cover every business situation that you will encounter. Consequently, we have implemented the compliance procedures outlined in this Code. The overarching principle in our procedures is **when in doubt, ask**. If you do not understand a provision of this Code or are confused as to what actions you should take in a given situation, you should follow the compliance procedures outlined in this Code. Those procedures will generally direct you to talk to either your immediate supervisor or a member of the Human Resources Department. Most situations can be resolved if you discuss them with your supervisor or Human Resources in an open and honest manner.

Adherence to this Code and to our other official policies is essential to maintaining and furthering our reputation for fair and ethical practices among our suppliers, customers, shareholders, communities and employees. Therefore, any actual or perceived violation of this Code must be immediately reported as outlined in the *Compliance Procedures* section below.

Upon evaluation of the reported violation and a determination that the reported act does, in fact, constitute a violation of this Code, our Legal Department and Head of the Human Resources Department will take the appropriate actions, which may include, but are not limited to, further investigation of the matter, consultation with outside counsel and disciplinary measures up to and including dismissal.

OUR CODE APPLIES TO US ALL IN EVERY LOCATION

Our Code applies equally to all of our employees, officers and members of our Board of Directors, and we are all held to the same standards regardless of our position.

Our Code is also global. Cinemark operates throughout the United States and many Latin America countries. No matter where you are employed, you are held to the standards in the Code. If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom, business practice or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation.

SPECIAL NOTICE FOR SENIOR FINANCIAL PERSONNEL

Our senior financial personnel, including our chief financial officer, controllers and financial managers and analysts, hold a special relationship of trust as stewards of our financial statements. Like all our other employees, our senior financial personnel are expected to familiarize themselves with all sections of this Code. Nevertheless, they should pay particular attention to the sections of this Code titled *Compliance with Laws, Rules and Regulations*, *Conflicts of Interest*, *Record Retention* and *Accounting Policies*, as well as any more detailed policies concerning those matters.



HOW TO USE THE CODE

After reading this Code, you should:

- Have thorough knowledge of the Code's terms and provisions.
- Be able to recognize situations that present legal or ethical dilemmas.
- Be able to deal effectively with questionable situations in conformity with this Code.

To accomplish these goals, we recommend that you take the following steps:

- Read the entire Code thoroughly.
- Think about how the provisions of this Code apply to your job and consider how you might handle situations to avoid illegal, improper or unethical actions.
- Complete all required training.
- If you have questions, ask your supervisor or the Human Resources Department.

When you are faced with a situation and you are not clear as to what action you should take, ask yourself the following questions:

- Is the action legal?
- Does the action comply with this Code?
- How will your decision affect others, including our suppliers, customers, shareholders, employees and the community?
- How will your decision look to others, *i.e.* does it have the appearance of wrongdoing?
- How would you feel if your decision was made public? Could the decision be honestly explained and defended?
- Have you contacted your supervisor or the Human Resources Department regarding the action?

NO RETALIATION FOR REPORTING

We will not retaliate against anyone who, in good faith, reports suspected illegal or unethical behavior, and we will not tolerate any harassment or intimidation of any employee who makes a report. Good faith does not mean that you have absolute proof but that you honestly believe your report.

When you report a concern, we will initiate a prompt investigation following any credible indication that a breach of law or this Code may have occurred. We will also initiate appropriate corrective action as we deem necessary, which may include notifying appropriate authorities. Employees are expected to cooperate in internal investigations of misconduct.



COMPLIANCE PROCEDURES

ASKING FOR HELP & REPORTING CONCERNS

We take this Code seriously and consider its enforcement to be among our highest priorities, but we also acknowledge that it is sometimes difficult to know how to handle certain situations. That is why we encourage open communication. ***When in doubt, ask.*** Whenever you have a question or concern, you are unsure about what the appropriate course of action is, or if you suspect that a violation of the law or this Code has occurred:

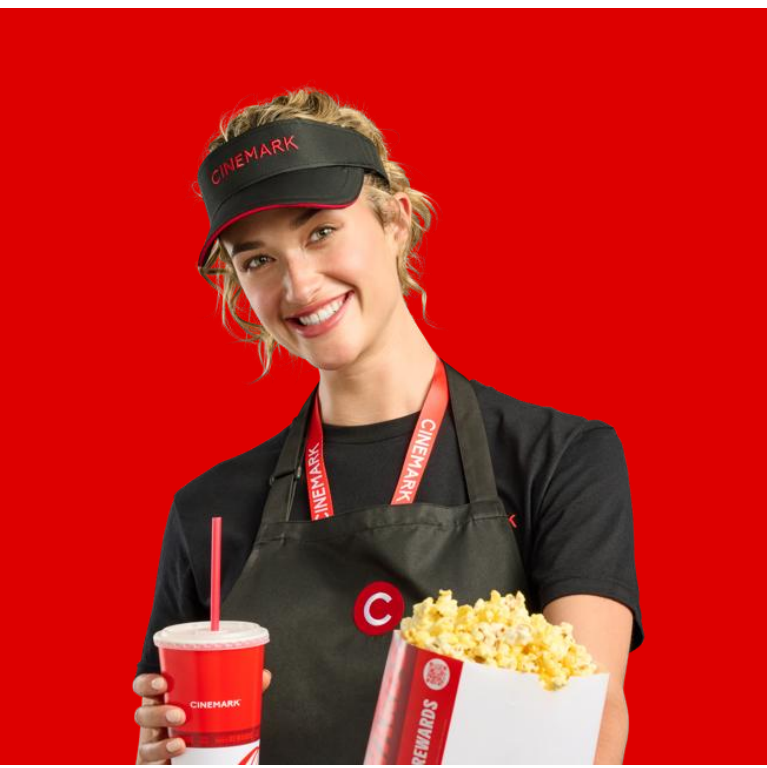
- *Ask yourself.* What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question with which you are faced, and the alternatives you have. Use your judgment and common sense; **if something seems unethical or improper, it probably is.**
- *Always ask first, act later.* If you are unsure of what to do in any situation, **seek guidance before you act.**
- *Please talk with your immediate supervisor or another manager.* He or she may have the information you need or may be able to refer the matter to an appropriate resource, including our Legal Department as circumstances warrant. Your supervisor or manager is responsible for alerting other appropriate corporate personnel as necessary. If you are uncomfortable talking with your immediate supervisor, you may also contact any manager in the Company with whom you feel comfortable.
- *You may also seek help from Company resources.* If you do not feel comfortable approaching your supervisor or another manager with your question, contact our Human Resources Department or the Legal Department at (972) 665-1000. If that is also not appropriate, **you may report an issue on the internet at www.Convercent.com or call the Business Help Line at (800) 461-9330 for callers in the U.S. and Canada. For persons outside the U.S. and Canada, call collect at (720) 514-4400. You have the option to make reports on the internet or by telephone anonymously.** If you prefer to write to the Company, address your concerns to: Cinemark Holdings, Inc., Attn: General Counsel, 3900 Dallas Parkway, Plano, Texas 75093.

The Business Help Line and the Convercent website are important resources for employees. Employees are encouraged to use them.

The Business Help Line is a toll-free telephone line or collect call, dedicated solely to accepting anonymous complaints, questions and concerns from employees. All calls to the Business Help Line are centrally answered by an independent third-party service. This service is available 24 hours a day, seven days a week. For those employees that do not speak English, there are operators available who speak other languages.

The Convercent website also allows for anonymous reporting and can be utilized in multiple languages. It can be accessed from any computer 24 hours a day, seven days a week.

- *Make sure you report all the facts.* In order to reach the right resolution, we must be as fully informed as possible.
- If your situation requires that your identity be kept secret, your anonymity will be protected. However, please remember that anonymous reports sometime make it difficult to conduct investigations, answer questions and resolve the issue at hand. ***The Company does not allow retaliation of any kind against employees for good faith reports of violations of this Code.***



WAIVERS OF THE CODE OF BUSINESS CONDUCT

Because our commitment to this Code is so strong, we will only grant waivers of it under the most unusual or compelling circumstances. Therefore, we expect that waivers will be granted very infrequently. If you would like to request a waiver of this Code for any reason, you must submit a written request to the Legal Department describing the nature of the waiver and explaining why you believe the waiver is appropriate.

The Legal Department has authority to deny any request for a waiver of the Code, and depending on the type of waiver requested, the Legal Department may have authority to grant the request. For certain types of waivers, however, only the independent, non-employee members of our board of directors have the authority to grant a waiver. For these types of waiver requests, the Legal Department will forward the request to the independent members of our board of directors for consideration. We will publicly disclose all waivers of this Code as required by law or other applicable regulations.



COMPLIANCE WITH LAWS, RULES & REGULATIONS

We comply with all laws and governmental regulations in every country where we do business. All employees must respect and obey the laws of the cities, states and countries in which we operate. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel or sources.

INSIDER TRADING

Employees who have access to confidential information about the Company are not permitted to use or share that information for securities trading purposes or for any other purpose except the conduct of our business. All non-public information about the Company and information that an investor would likely consider to be important in making a decision whether to buy, sell or hold our stock or other securities should be considered confidential information. Buying or selling our stock or other publicly traded securities when you are in possession of confidential information is prohibited. You are also prohibited from disclosing such information to anyone else (including friends or family members) in order to enable them to trade on the information. In addition, if you acquire confidential information about another company due to your relationship with us or due to your relationship with someone who has confidential information regarding that other company, you may not buy or sell that other company's stock or other securities until such information is publicly disclosed. Using non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. If you have any questions, please consult our Legal Department.

Penalties for trading on or communicating material inside information are severe. If you are found guilty of an insider trading violation, you can be subject to civil and even criminal liability. In addition to being illegal, we believe that insider trading is unethical and will be dealt with firmly, which may include terminating your employment with us and reporting violations to appropriate authorities.

For more information about our policies concerning securities laws, you should refer to our more detailed Policy Prohibiting Insider Trading and Unauthorized Disclosure of Information to Others. **Our directors, executive officers and certain other designated employees are also subject to a Supplemental Policy Concerning Insider Trading.** These policies are available on our Workday Policy library or from our Human Resources Department or our Legal Department.

If you have any questions concerning securities laws or about our policies with regard to those laws, or regarding the correct ethical and legal action to take in a situation involving material nonpublic information, please contact your immediate supervisor or our Legal Department.

ANTITRUST & FAIR COMPETITION

We and our subsidiaries do business globally in a highly competitive industry. Our activities are subject to the antitrust and competition laws of the United States and those of the various other states and countries in which we do business. In general, those laws prohibit agreements or actions that may restrain trade or reduce competition.

Examples of possible violations of these laws include agreements with competitors to fix or control prices, to boycott specified suppliers or to allocate products, territories or markets.

Special care should be taken to ensure that any contact with representatives of our competitors, film distributors, suppliers and others with whom we do business will not be, or not be viewed as, a violation of any antitrust law.

You should also avoid making inaccurate or misleading statements about competitors, suppliers, customers or their offerings. Antitrust laws may also apply in other circumstances, like trade association meetings or strategic alliances involving competitors. Because foreign countries often have their own body of antitrust laws, international operations may be subject to antitrust laws of either the United States or foreign countries.

Unlawful agreements need not be written or even consist of express commitments. Agreements can be based on informal discussions or the mere exchange of information with a competitor. If you believe that a conversation with a competitor enters an inappropriate area, end the conversation at once. Whenever any question arises as to the significance or application of antitrust laws, you should consult with our Legal Department, and any agreements with possible antitrust implications should be made only with the prior approval of our General Counsel.

TRADE COMPLIANCE

Cinemark is a global company, with employees, operations and suppliers around the world. We must comply with all trade compliance laws and regulations, including not doing business with countries or third parties that are subject to applicable trade embargos or economic sanctions. Also, as a Company based in the United States, we do not participate in boycotts that the United States does not support.



ANTI-BRIBERY/ANTI-CORRUPTION

The U.S. Foreign Corrupt Practices Act, and other countries' anticorruption laws, prohibit giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates to obtain or retain business. **All employees, officers and directors are strictly prohibited from making illegal payments to government officials of any country.**

In addition, the U.S. government has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. Our Legal Department can provide guidance to you in this area.

PROTECTING PRIVACY RIGHTS

Cinemark is committed to protecting personal privacy rights and complying with all applicable privacy laws. When legal and business requirements make it necessary for us to acquire, record, store, use or otherwise process personally identifiable information, we must handle that information appropriately. If you have questions regarding the necessary procedure for collection and handling personally identifiable information, contact the Legal Department for assistance.

BUSINESS CONDUCT

We must stay true to Cinemark's values by conducting business ethically in conformity to the standards set forth in our Code.

DISCRIMINATION & HARASSMENT

The diversity of the Company's employees is a tremendous asset. Our Company is committed to equal opportunity for all team members and applicants without regard to race, color, religion, gender, sexual orientation, gender identity, age, national origin, ancestry, pregnancy, marital status, disability, veteran status or any other characteristic protected by federal, state or local laws. We are committed to providing a workplace free from all forms of discrimination, including sexual and other forms of workplace harassment. We respect the right of individuals to achieve professional and personal balance in their lives. We will not tolerate any illegal discrimination or harassment of any kind. Examples include, but are not limited to, derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances.

CONFLICTS OF INTEREST

Employees' actions and decisions should be made objectively and in the best interest of Cinemark. In general, a conflict of interest occurs when your personal interest interferes, or appears to interfere, with Cinemark's interests.

Employees should not compete with Cinemark, take Cinemark's opportunities, or use Cinemark's property for their personal benefit.

Conflicts of interest can occur in many areas, including:

- Gifts & Entertainment
- Outside Employment
- Working with Relatives and Close Friends
- Romantic Relationships at Work
- Ties to Competitors and Business Partners

Because conflicts of interest are situational and fact specific, you should immediately disclose any actual, potential or apparent conflicts of interest to your supervisor or to the Human Resources Department.

GIFTS & ENTERTAINMENT GUIDELINES

Employees should avoid the receipt of gifts, gratuities, favors or other benefits that might affect or appear to affect the exercise of their judgment on our behalf.

Any substantial gift or favor offered by an actual or potential client, contractor, or provider of goods or services, lender, security holder, or other affiliate, whether it be in tangible form or in the form of a service or individual benefit, should be refused unless acceptance of such gift or favor has been approved per the following guidelines:

- Gifts or favors greater than \$75 but less than \$200 must be approved by the department head.
- Gifts or favors greater than \$200 must be approved by the Head of the Human Resources Department.

This prohibition on gifts and favors does not apply to ordinary courtesies of business, such as token gifts of insubstantial value (\$75 or below), modest entertainment incidental to a business relationship, or the giving or receipt of normal hospitality of a social nature, provided acceptance of such gifts do not conflict with the Company's interests.



VENDOR RELATIONSHIPS

It is good business practice to have more than one person involved in vendor relationships and when making a purchase or soliciting proposals for professional services. Accordingly, the Company's Purchasing Department will assist in implementing and maintaining material business relationships. The role of the Purchasing Department is to lend negotiating support and expertise and to minimize the potential for conflict-of-interest situations. Cinemark team members must actively work to ensure that any vendor he or she is primarily responsible for also has relationships and contacts outside of the primary contact's department. No negotiations or "requests for services" should be conducted in an exclusive manner.

It is also good business practice to have multiple departments involved in the review and approval of contracts. The Cinemark Global Purchasing Policy provides guidelines for certain types of purchases, including capital expenditures, theatre-level non-capex purchases, corporate office supplies, demo and loaner equipment, theatre-level repairs and maintenance services, certain non-theatre operating expenditures, certain service subscriptions and certain consulting agreements. Other types of contracts, including film licensing agreements, real estate lease agreements, healthcare benefits and insurance policies, and other legally binding agreements that create rights or obligations for Cinemark, may require review and approval by our Accounting, Tax, and Legal personnel. If you are unsure whether a contract needs review and approval, you should contact our Legal Department for guidance.

HEALTH & SAFETY

The Company strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Employees should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs or alcohol in the workplace will not be tolerated.

Violence and threatening behavior are never permitted.



SOCIAL MEDIA

Only certain designated employees have the authority to speak on behalf of Cinemark. All other employees should never indicate that they are speaking on Cinemark's behalf in a social media post. Also, employees must never disclose Cinemark's proprietary or confidential information in a social media post. If commenting on social media about the Company, employees should clearly disclose in the post that their views are their own and are not speaking for the Company. Employees should avoid posts that could compromise Cinemark's reputation, such as vulgar, violent or discriminatory posts. In other words, use common sense—if you wouldn't say something in person, don't post it on social media.

BARTERING CINEMARK PASSES

Certain Company suppliers may request Cinemark complimentary passes in exchange for goods or services. All such “trades” must be approved in accordance with the Company's Employee Movie Card and Guest Pass Policy. It is expressly forbidden to barter passes or concession items or any other Company asset for personal favors or services without required approval.

PROTECTING COMPANY ASSETS

All employees should endeavor to protect the Company's assets and ensure their proper and efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation.

SAFEGUARDING PROPRIETARY & CONFIDENTIAL INFORMATION

Employees must maintain the proprietary and confidential information entrusted to them by the Company and by others with whom we do business.

Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, designs, databases, and any unpublished financial data and reports. Unauthorized use or distribution of this information not only violates Company policy, but it could also be illegal and result in civil or even criminal penalties.



Confidential information includes all non-public information that might be of use to competitors or harmful to the Company, its employees or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us.

The obligation to preserve proprietary and confidential information continues even after employment ends. Therefore, employees must not bring proprietary and confidential information to Cinemark from previous employers or take Cinemark's proprietary and confidential information if they leave.

If an employee needs to disclose Cinemark's proprietary or confidential information or if a business contact needs to disclose its proprietary or confidential information to us, request a Non-Disclosure Agreement (NDA) from the Legal Department before the disclosure of the information.

ACCURACY OF BOOKS & RECORDS/RECORD RETENTION

All information you record or report on our behalf, whether for our purposes or for third parties, must be done accurately and honestly. All of our records (including accounts and financial statements) must be maintained in reasonable detail, must be kept in a timely fashion and must appropriately reflect our transactions.

All employees are expected to timely disclose all necessary information to ensure that all transactions are recorded properly so that our books and records are complete and accurate. Recording data in a timely and truthful manner protects our company resources and meets the expectations of those people, including investors and customers, who rely on the accuracy of our books and records to perform their jobs. ***Falsifying records or keeping unrecorded funds and assets is a severe offense and will result in disciplinary action, which may include prosecution or loss of employment.***

We will retain all books, records and statements in accordance with our record retention policies and all applicable laws and regulations.

From time to time we are involved in legal proceedings that may require us to make some of our records available to third parties. The Legal Department will assist in releasing appropriate information to third parties and provide you (or your supervisor) with specific instructions.

It is illegal to alter, destroy, modify or conceal any information that is relevant to a legal proceeding or a government investigation. If you are informed that information in your possession is the subject of a legal proceeding or government investigation, or if you have other reason to believe that such information may be involved in a legal proceeding or governmental investigation, no matter whether you think it is relevant or not, you are prohibited

from making any effort to alter, destroy, modify or conceal that information. The Legal Department will be able to help you if you have any questions.

ACCOUNTING POLICIES

We must maintain accounting records of the highest possible quality. We expect that you will record all financial transactions (such as sales, leases or purchases) truthfully, accurately and in sufficient detail so that our records are reliable and fairly reflect the nature of the transactions. Because the information derived from these records is provided to our shareholders, investors, and government agencies, our accounting records must follow generally accepted accounting principles and other laws and regulations such as those of the Internal Revenue Service and the Securities and Exchange Commission.

All revenues, expenses, assets and liabilities must be entered into our books and records in an accurate and timely fashion. You may not maintain any unrecorded or secret fund, asset or account for any purpose. No false, fictitious or misleading entries may be made in our books, records or accounts for any reason. You may not make any payment or transfer of funds or assets with the intent that any portion is to be used for any purpose other than that described in the documents supporting the payment or transfer. No invoices believed to be false or fictitious may be paid. All accounting personnel, financial officers and executive officers should follow generally accepted accounting principles and administer company books and accounts in accordance with our other established accounting policies and internal controls. The reports we file with the Securities and Exchange Commission and other government agencies must contain information that is full, fair, accurate, timely and understandable in light of the circumstances surrounding disclosure.

Our internal and external auditing functions are integral components that help ensure that our financial books, records and accounts are accurate. Therefore, you should provide our accounting department, internal auditing staff, audit committee and independent public accountants with all pertinent information that they may request. We encourage open lines of communication with our audit committee, accountants and auditors and require that all our personnel cooperate with them to the maximum extent possible. It is unlawful for you to fraudulently induce, coerce or mislead our public accountants for the purpose of making our financial statements misleading.

If you are unsure about the accounting treatment of a transaction or believe that a transaction has been improperly recorded or you otherwise have a concern regarding a questionable accounting practice or audit matter, you should confer with your supervisor, the corporate controller or our chief financial officer, or you may submit your concern, on a confidential or an anonymous basis, 24 hours a day, seven days a week on the internet at www.convercent.com or by telephone from the United States and Canada: (800) 461-9330 or by telephone outside the United States and Canada, calling collect to: (720) 514-4400. Interpreters are always available.

PERSONAL USE OF COMPANY ASSETS

Company equipment should not be used for non-Company business, unless approved by the Head of the Human Resources Department. However, incidental personal use of telephones, fax machines, copy machines, computers, email and similar equipment is generally allowed if there is no significant added cost to the Company, it does not interfere with your work responsibility and is not related to an illegal activity or outside business. Our assets may never be used for any unlawful purpose.

RESPONSIBILITY USE OF ARTIFICIAL INTELLIGENCE

When using artificial intelligence ("AI"), including generative AI, you must act responsibly, ethically and in accordance with all applicable law and the Company's Artificial Intelligence Services policy. AI and its uses continue to evolve, along with laws and regulations governing its use. If you have questions about the use of AI in your role, please contact the Legal Department.

CINEMARK®

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