

CODE OF CONDUCT



SOUTHERN CROSS AUSTEREO
absolutely engaging

MESSAGE FROM OUR CEO GRANT BLACKLEY

We are Australia's leading media company covering the biggest and most diverse media and content offering of any media company in the country. With a total of 78 radio stations, 32 regional television stations across 47 markets, 17 DAB+ digital radio stations and leading online and social communities nationally, we produce more live content than any other broadcast business across both metro and regional communities.

Our success depends on the highest standards of professionalism and how we conduct ourselves in all our dealings both internally and externally is paramount.

Our code of conduct applies to all those who work for, act on behalf of or represent the Company. The purpose is to ensure an open, vibrant and progressive environment where everyone can give their best.

The code reflects many of the policies and practices that are already in place or that may be implemented in the future. The Southern Cross Austereo policies that go into more detail should be read by all employees and can be located on [MyNet or are available through Human Resources](#).

We take this code very seriously as it forms part of your employment with SCA, any potential breaches will be investigated and disciplinary action may result, therefore it is critical that we all comply.

Our people should feel able to raise concerns if they suspect any breaches of this code of conduct. People wanting to raise concerns can speak to their direct manager, a senior manager or a member of the HR or Legal teams. All genuine concerns will be investigated properly. Any form of retribution against anyone who has raised a concern will not be tolerated and will be treated as a disciplinary matter. If a concern has been raised maliciously that would also be treated as a serious disciplinary matter.

I know we all take pride in working for SCA and if we all act with integrity, we will live up to the commitments contained within this code of conduct.



<p>BUSINESS ETHICS AND VALUES</p>	<p>We should always be honest, fair and truthful in all our dealings both internal and external. That includes dealing with stakeholders such as colleagues, clients, consumers, business partners, suppliers and government authorities.</p> <p>Our values are the standards which people across SCA share. They represent the things we cherish and aspire to; they guide our day-to-day decisions and shape our individual and collective behaviour.</p> <p>All of us are responsible for demonstrating behaviour aligned with our Company Values whether that be dealing internally with colleagues or in our dealings with external parties.</p>
<p>OUR PEOPLE</p>	<p>We treat each other with dignity, respect and expect our people to work constructively and collaboratively with their own and other teams.</p> <p>EQUAL OPPORTUNITY</p> <p>Our people should always be treated fairly with dignity and respect. The Company values a diverse workforce where all people are treated with respect and fairness and have equal access opportunities available to them. Our people are responsible for promoting equal opportunity in the workplace.</p> <p>HEALTH, SAFETY AND WELFARE</p> <p>We are committed to ensuring the health, safety and welfare at work for all employees and visitors. We will always strive to ensure we comply fully with all applicable and relevant laws and regulations relating to the workplace and ensure the protection of our people, clients and members of the general public.</p> <p>Everyone who works at SCA is responsible for their own safety and the safety of others. We must consider anyone who may be affected by our actions and behaviours.</p> <p>DRUGS AND ALCOHOL</p> <p>Our people must not use, distribute or possess illegal drugs at work and should carry out their duties free from the influence of illegal drugs or alcohol.</p> <p>DISCRIMINATION, HARASSMENT AND BULLYING</p> <p>We are committed to an environment free from harassment and bullying whether that be physical, verbal or online.</p> <p>REPORTING OFFENSIVE BEHAVIOUR</p> <p>All reports of inappropriate or offensive behaviour will be treated seriously and investigated.</p>
<p>CONFIDENTIAL INFORMATION</p>	<p>Everyone who works at SCA has a responsibility for protecting the company's confidential information both during and after employment. Confidential information includes but is not limited to; client details, financial, budgeting, technology, passwords, personal details, competition details, commercial, operational and strategic plans.</p>

COMPANY PROPERTY	<p>Our people should not engage in theft, fraud or misuse of company property or the personal property of other colleagues.</p> <p>Misuse of company property includes but is not limited to: supplies, equipment, documents, petty cash, corporate credit cards, cab charges, prizes, mobile phones, laptops, iPads, computers, printers, submitting false timesheets, or expense claims.</p>
CONFLICT OF INTEREST	<p>Our people should actively avoid any obvious conflict between personal interest and those of SCA. Any potential conflict of interest should be declared to your manager or HR.</p> <p>Examples of conflict of interest could include:</p> <ul style="list-style-type: none"> • Negotiating a contract with a supplier owned or managed by a close friend or relative; • Carrying out work of a similar nature for a competitor; • Having a personal or financial interest in a business that has dealings with SCA; • Obtaining financial gain or advantage from a business transaction made in the course of duty; • Influencing an employee's promotion or recruitment in circumstances where the two people have a close relationship. <p>We should not use any internal information gained in the course of our work to our own advantage or to that of a friend or relative.</p>
INTELLECTUAL PROPERTY	<p>We value our intellectual property and proper management of these assets is critical to our success.</p> <p>All documents, materials, records, video and audio acquired or created in the course of employment is the property of SCA. Our people may only remove originals or copies of such property from our offices or send to other emails addresses for the sole purpose of performing their work duties and must return such information on request.</p>
PRIVACY AND DATA COLLECTION	<p>We must all comply with applicable privacy and data protection laws and regulations and respect the privacy of our clients, listeners, audiences, contractors, and colleagues. Usage of company systems, email and internet facilities may be monitored to ensure lawful and best practice.</p>

TECHNOLOGY ACCEPTABLE USE	<p>Everyone is responsible for using our technology properly and in accordance with the Technology Acceptable Use Policy.</p> <p>When travelling with SCA equipment or information care should be taken to prevent damage, loss or theft.</p> <p>Our systems are intended for business use. However, we are permitted to use them for non-business purposes but care should be taken to ensure use does not interfere with our obligations to SCA or infringe on anyone's intellectual property rights. We must all exercise care when writing emails, documents or social media that may damage SCA's, our clients' or your reputation.</p>
SOCIAL MEDIA	<p>Social Media platforms such as Facebook, Twitter, Google and Instagram have become critical business tools, particularly for a broadcast business like Southern Cross Austereo. A broad range of employees in various roles represent our brands and company by posting and engaging with our audience on behalf of their station brands, shows and our clients.</p> <p>All interactions on social media presences are public. In the eyes of the law (and the media) there is no difference between a Facebook post and a live break on-air. Anything published on a social media presence needs to adhere to the same rules and guidelines we follow when broadcasting content via our TV and radio stations. Please bear in mind that comments by third parties on our social media posts are also our responsibility and should be moderated in accordance with the same rules and guidelines.</p>
TELEVISION AND RADIO CODES AND STANDARD	<p>It is essential for our business and a condition of our employment within Southern Cross Austereo that everyone who creates, broadcasts and/or publishes Content undertakes training provided. If anyone is unsure regarding their obligations under these codes, they should speak to their Manager, Content Director, Legal or HR.</p>
COMPETITIONS AND TRADE PROMOTIONS	<p>Immediate family members are automatically ineligible to enter any of our competitions or trade promotions.</p> <p>Please check with a member of the legal team if you are unsure about the terms regarding competitions or promotions.</p>
FINANCIAL ACCOUNTING AND APPROVALS	<p>All financial information should be recorded and presented accurately. If you are unsure about getting any expense approved please contact a member of the Finance team.</p>

DECLARING GIFTS, BENEFITS OR BRIBES	<p>Our people and their family members should not give or accept any gift, entertainment, sponsorship, charitable donation or other benefit which might be intended or perceived as an attempt to improperly influence the business relationship between SCA and another party doing business with us.</p> <p>Customary or reasonable gifts, hospitality, meals of modest value in the normal course of business are acceptable. Gifts of cash must never be made or accepted.</p> <p>Prior approval must be sought from the CEO, CFO or COO for:</p> <ul style="list-style-type: none"> • Any gift with a value in excess of \$500.00 • Any hospitality in excess of \$500.00 <p>If there is any doubt about what to do, advice should be sought from your direct manager, CFO or COO.</p>
CORPORATE SOCIAL RESPONSIBILITY	<p>We acknowledge our responsibilities towards the community and the environment and in particular our shareholders, employees, listeners, viewers, customers and suppliers.</p> <p>We are committed to managing the way in which we operate and continue to improve our corporate responsibility policies and performance.</p>
OFFICIAL REQUESTS FOR INFORMATION	<p>Colleagues who are contacted by regulators or authorities or any lawyers representing third parties requesting company information or documents should immediately notify SCA's General Counsel.</p>
CONTACTS WITH THE MEDIA	<p>Our Head of Regulatory Affairs and Corporate Communications handles all external media communications concerning the Company. No statement should be made or an opinion expressed to the press or other media or a third party without the supervision of the Head of Regulatory Affairs and Corporate Communications.</p>