

SCA

**Code of
Conduct**

CODE OF CONDUCT

Message from our CEO Grant Blackley

We are one of Australia's leading media companies 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 the People and Culture team.

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 People and Culture 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.





Purpose:

To ensure an open, vibrant and progressive environment where everyone can give their best.

Scope:

The Code of Conduct applies to all members of SCA comprising of those who work for, act on behalf of, or represent the Company.

Guiding Values:

Our core values underpin all that we do. They are:

Take **INITIATIVE** – each of us is responsible for exceeding expectations. We go the extra mile.

We **COLLABORATE** – we work as a team. Together we deliver our best.

Have **COURAGE** – we always show strength and spirit. We stand up for our beliefs and each other.

Maximise **CREATIVITY** – we lead with fresh thinking. We create winning ideas.

Act with **INTEGRITY** – we do what is right and act with transparency and honesty. We deliver on our promises.

Responsibilities:

- Each individual is accountable and responsible for their actions, individuals must be aware of, and comply with, the Code of Conduct.
- Model our Values of Initiative, Collaborate, Courage, Creativity and Integrity, Perform your defined duties to the best of your ability.
- Report behaviour that may be contrary to the Code of Conduct and required standards of behaviour.
- Keep all records, documents, and communications accurate, truthful, and up to date.
- Inform yourself and comply with all SCA policies and procedures relevant to your position.
- Refer to the policy and procedure below for specific responsibilities in relation to the Code.

Policy:

The Code of Conduct outlines the required standard of acceptable conduct and behaviour that we expect of all SCA People in the performance of your duties and interactions at work no matter where you are performing your duties. This required standard of acceptable conduct and behaviour supports our ability to maintain public trust and confidence in the integrity and professionalism of the services we provide to the community.

The Code of Conduct and the behaviours outlined within it are fundamental to providing an ethical framework in building a healthy, positive, and respectful workplace. The Code of Conduct also governs the way in which all SCA People are expected to relate to one another, external professionals, clients, visitors, and all stakeholders.

The Code of Conduct is not intended to provide a detailed and exhaustive list of what to do in every aspect of work. Instead, it represents a broad framework that will help guide conduct and behaviour in the performance of duties and interactions in the workplace.

Procedure:

<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 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 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. We have a dedicated Work Health and Safety Management System that guides us in meeting these requirements.</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.

We treat each other with dignity, respect and expect our people to work constructively and collaboratively with their own and other teams.

Drugs and alcohol

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.

Discrimination, harassment and bullying-free workplace

We are committed to an environment free from harassment, discrimination, victimisation and bullying whether that be physical, verbal or online.

You must not discriminate, victimise, intimidate, bully or harass other workplace participants, clients, external stakeholders or members of the wider community for any reason.

Reporting offensive behaviour

All reports of inappropriate or offensive behaviour will be treated seriously and investigated.

Dress

Our people should adhere to business casual attire whilst in the office and during external client meetings / events. Particular care should be taken to ensure that clothing choices are safe and appropriate for the role you perform, including by wearing closed in footwear, and sun-protection if working outdoors (such as a hat and sunscreen). Business casual attire also extends to Working from Home, specifically when in attendance of internal and external webex meetings.

No dress code can cover all contingencies so employees must exert a certain amount of judgment in

	<p>their choice of clothing to wear to work. If you experience uncertainty about acceptable business casual attire for work, please ask your manager or HR Business Partner.</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>
<p>Secondary Employment</p>	<p>SCA people may be permitted to engage in outside employment, provided that this employment does not have a detrimental impact on your ability to meet the requirements of your role, adversely affect your work performance or give rise to a business conflict or potential conflict of interest. Before engaging in secondary employment, our people should first discuss this with their Manager or a member of the People and Culture team.</p>
<p>Company Property</p>	<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> <p>Private use of resources for purposes unrelated to SCA's business is prohibited if it is illegal, unethical and used to gain personal profit or interferes with you carrying out the duties of your role.</p> <p>You must care for SCA equipment, property and uniforms issued to you.</p>

<p>Conflict of Interest</p>	<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 People and Culture.</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. • 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>Any pre-existing relationship that may lead to a conflict of interest including with external clients / stakeholders must be disclosed to your direct manager and/or a member of the People and Culture team.</p>
<p>Intellectual Property</p>	<p>We value our intellectual property and proper management of these assets is critical to our success.</p> <p>You must not use personal or business information about SCA or any information you have access to through your work for any personal gain or gain for other such as friends, relatives or business associates.</p> <p>All documents, materials, records, video and audio acquired or created in the course of employment is the property of</p>

	<p>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>
<p>Privacy and Data Collection</p>	<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>
<p>Technology Acceptable Use</p>	<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>
<p>Social Media</p>	<p>Social Media platforms such as Facebook, Twitter, Google Instagram and TikTok 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</p>

	<p>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>
<p>Television and Radio Codes and Standards</p>	<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 a member of the People and Culture team.</p>
<p>Competitions and Trade Promotions</p>	<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>
<p>Financial Accounting and Approvals</p>	<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>
<p>Declaring Gifts, Benefits or Bribes</p>	<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

	If there is any doubt about what to do, advice should be sought from your direct manager, CFO or COO.
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	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.
Contacts with the Media	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.

Reporting Breaches of the Code of Conduct:

All SCA employees must report suspected or known breaches of the Code of Conduct or other SCA policies/procedures. The appropriate person to report the breach to may vary according to the situation, however options may include:

- Your direct manager
- Another manager in the organisation that you trust
- Any member of the People and Culture team
- General Counsel

SCA takes all genuine reports seriously and will support anyone who reports wrongdoing. Please also refer to the *Whistleblower Policy* for more information on reporting dishonest, fraudulent or corrupt conduct.

Failure to Comply with the Code of Conduct:

SCA People may be subject to disciplinary action, up to and including termination of employment or contract, where it is established that you have breached the Code



of Conduct.

Authority:

This Policy has been authorised by the Board of Directors.

SCA may amend or vary this Code of Conduct, in its absolute discretion, from time to time.

Resources:

The SCA People are expected to comply with all Southern Cross Austereo policies and procedures. These should be read by all employees and can be located on [MyNet or are available through Human Resources.](#)