

CODE OF CONDUCT

SCA

A MESSAGE FROM OUR CEO: JOHN KELLY

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. We are the home of LiSTNR, the Hit and Triple M networks and regional television stations, reaching more than 95% of the Australian population. We own 99 radio stations across FM, AM and DAB+ under the Triple M and Hit network brands and provide national representation for 56 regional radio stations, with 6.131 million listeners across the Hit and Triple M networks. The LiSTNR digital audio sales network reaches an estimated 8 million people each month. We broadcast 96 free to air TV signals across regional Australia and represent or have joint venture with 39 TV stations, reaching 3.6 million people a week. We have leading online and social communities nationally and 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. The code reflects many of the policies and practices that are already in place or that may be implemented in the future. The SCA 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 truly value the importance of this code, it forms part of your employment agreement with SCA. Rest assured that any potential breaches will be thoroughly looked into, and appropriate actions may be taken. It's crucial that we all work together to uphold these standards.

At SCA, we encourage our team members to speak up if they ever suspect any violation of this code of conduct. You can reach out to your direct manager, a senior manager, or connect with a member of our People and Culture or Legal teams. We want you to know that all genuine concerns will be handled with care and diligence. We absolutely do not tolerate any form of retaliation against those who raise concerns, and such actions will be dealt with as disciplinary matters.



John Kelly

SCA

01. PURPOSE

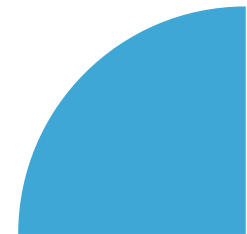
To ensure an open, vibrant and progressive environment where everyone can give their best.

02 - SCOPE

The Code of Conduct applies to everyone who works for, acts on behalf of or represents SCA, including our directors, employees, and contractors.

03 - GUIDING VALUES

Our core Values underpin all that we do.



Our Guiding Values



PEOPLE ARE OUR POWER

We seek diverse backgrounds and perspectives – and make space for people to contribute and flourish.

We understand our audiences and create content they love.

We are about our clients, and find solutions that help them succeed.

We design our products with people in mind.

BE GENUINE

We don't shy away from having genuine conversations.

We have the courage to speak up for ourselves and others.

We don't have time for politics.

We create authentic content that connects.

ALWAYS CURIOUS

We take creative risks and have fun.

We learn something new every day.

We constantly seek a better way forward.

We learn from our mistakes.

WE PUSH DOORS OPEN

We push doors open to unlock new opportunities
We drive outcomes – and achieve what we set out to do.

We identify both problems and solutions.

We are proactive not reactive.

We guide our own career journeys.

WE'RE BETTER TOGETHER

We collaborate, because collaboration gets us the best outcomes.

We include multiple perspectives in project groups.

We actively seek feedback from others and take it on board – it helps us grow.

Our leaders value ideas from everyone.

Responsibilities

- Be accountable and responsible for your actions.
- Be aware of, and comply with, the Code of Conduct.
- Model our Values.
- 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

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Business Ethics & Values

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.

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.

All of us are responsible for demonstrating behaviour aligned with our Values whether that be dealing internally with colleagues or in our dealings with external parties.

Our People

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

Equal opportunity

Our people should always be treated fairly with dignity and respect. We value 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.

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.

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.

Our People

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.

Our People

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. Business casual attire also extends to working from home, specifically when attending internal and external video conferences.

No dress code can cover all contingencies so employees must exercise judgment in 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.

Secondary Employment

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.

Secondary employment undertaken by our people is subject to written approval from the individual's reporting manager. SCA retains the right to refuse secondary employment on reasonable business grounds.

Company Property

Our people should not engage in theft, fraud or misuse of company property or the personal property of other colleagues.

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.

Private use of resources for purposes unrelated to SCA's business is prohibited if it is illegal, unethical, used to gain personal profit or interferes with you carrying out the duties of your role.

You must care for SCA equipment, property and uniforms issued to you.

Conflict of Interest

Our people should actively avoid any conflict between personal interest and those of SCA. Any potential conflict of interest should be declared to your manager or People and Culture.

Examples of conflict of interest could include:

- 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.

Any 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.

Intellectual Property

We value our intellectual property and proper management of these assets is critical to our success.

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 others such as friends, relatives or business associates.

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.

Privacy & Data Collection

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.

Confidential Information

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.

Technology Acceptable Use

Everyone is responsible for using our technology properly and in accordance with the Technology Acceptable Use Policy.

When travelling with SCA equipment or information care should be taken to prevent damage, loss or theft.

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.

Social Media

Social Media platforms such as Facebook, X, YouTube, Instagram and TikTok have become critical business tools, particularly for a media business like SCA. 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, podcasts, and our clients.

All interactions on social media are public. In the eyes of the law (and the media) there is no difference between a social media post and a live break on-air. Anything published on social media needs to adhere to the same rules and guidelines we follow when communicating via LiSTNR or 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.

Television, Radio Codes & Standards

It is essential for our business and a condition of our employment with SCA 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.

Competitions & Trade Promotions

Immediate family members are automatically ineligible to enter any of our competitions or trade promotions.

Please check with a member of the Legal team if you are unsure about the terms regarding competitions or promotions.

Financial Accounting & Approvals

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.

Declaring Gifts, Benefits or Bribes

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.

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.

Prior approval must be sought from the CEO or CFO for:

- Any gift with a value in excess of \$500.00
- Any hospitality in excess of \$500.00

You must declare any such gift in SCA's gift register.

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

Corporate Social Responsibility

We acknowledge our responsibilities towards the community and the environment and in particular our shareholders, employees, listeners, viewers, customers and suppliers.

We are committed to managing the way in which we operate and continue to improve our corporate responsibility policies and performance.

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 Corporate Communications and Trade PR handles all external media communications concerning SCA.

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 Corporate Communications and Trade PR.

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:

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

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