



SUSTAINABILITY REPORT

SCA

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About SCA



Southern Cross Media Group Limited (ASX: SXL) (SCA) delivers entertainment media solutions across an unrivaled portfolio of Australian multimedia brands. Founded in 2004 with our registered office in Melbourne, SCA is one of Australia's leading media companies, the home of LiSTNR, radio networks Hit, Triple M and regional television stations, reaching more than 95% of the Australian population.

SCA owns 99 radio stations across FM, AM, and DAB+ under the Triple M and Hit network brands and provides national sales representation for 56 regional radio stations, with over eight million listeners across the Hit and Triple M networks.

Our LiSTNR digital audio app hosts a library of free and compelling digital audio content available anytime, anywhere. It houses SCA's 99 FM, AM, and DAB+ radio stations, including AFL, NRL and international cricket coverage, over 25 music genre stations, and over 800 podcasts from leading Australian and global creators, plus local news and information.

With more than 1.5 million signed-in users, LiSTNR has something to entertain, inform, and inspire all Australians and helps advertisers to connect with highly engaged and addressable audiences. The LiSTNR digital audio sales network reaches an estimated 8 million people each month.

SCA broadcasts 96 free to air TV signals across regional Australia and represents or has a joint venture with 39 TV stations, reaching

3.6 million people a week. SCA broadcasts Network 10 programs in regional Queensland, southern NSW, and Victoria and provides national advertising sales representation for Network 10 programming in all Australian states and territories. SCA also broadcasts and provides sales representation for Seven Network programming in Tasmania, Darwin, Remote Central and Eastern Australia as well as Seven and Nine Network programming in Spencer Gulf and Broken Hill. SCA also features Sky News Regional in regional Queensland, southern NSW, Victoria and sales representation in northern NSW, Griffith and Mount Gambier. SCA provides Australian sales representation for global open audio platform SoundCloud and Sonos Radio.

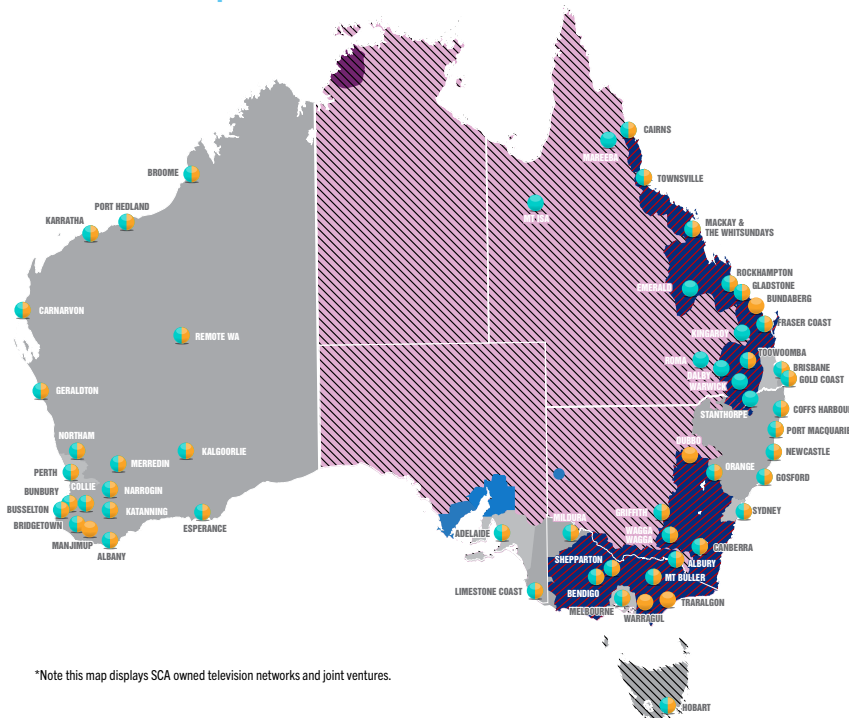
Information on our financial performance can be found in our Annual Report.

More information is available on our corporate website: www.southerncrossaustereo.com.au.

About this Sustainability Report

This report covers SCA's activities in FY23 – from 1 July 2022 to 30 June 2023.

National Area Map



*Note this map displays SCA owned television networks and joint ventures.



TV COVERAGE

NETWORK 10	
SGT	
CENTRAL DIGITAL TELEVISION	
DARWIN DIGITAL TELEVISION	
SEVEN NETWORK	
SKY NEWS REGIONAL	



RADIO COVERAGE

HIT NETWORK ONLY	
TRIPLE M NETWORK ONLY	
HIT & TRIPLE M NETWORKS	

CEO Message

Proudly national and fiercely local, our purpose is to entertain, inform, and inspire Australians: anytime, anywhere.

SCA is all about audio. This includes broadcast and livestreamed radio, music streaming, and on-demand podcasts for consumption by increasingly diverse audiences in increasingly digital ways. And our audiences, employees, advertisers, communities, and shareholders expect us to prosper and deliver positive outcomes for them in a responsible way. Sustainability is therefore a core business principle for SCA.

In the financial year just ended, we completed our first GHG emissions inventory and identified opportunities to reduce our carbon footprint in years to come. In the year ahead, we'll crystallise many of those opportunities and set targets to hold ourselves accountable for results. The steps we've already taken will also stand us in good stead to comply with the mandatory climate reporting requirements likely to take effect from 1 July 2024.

Prompted by the digital transformation of our business in recent years, and the resultant changes in our workforce, we refreshed and modernised our corporate values. We also renewed our commitment to diversity and inclusion by launching a three-year Diversity and Inclusion Strategy. A first step is the launch on 1 July 2023 of an enhanced and gender-neutral paid parental leave scheme that provides 20 weeks leave for primary carers and four weeks leave for secondary carers.

These initiatives were informed by consultation with our people and review of best practice among successful local and global media and other businesses.

LiSTNR and the growth of digital audio have opened new opportunities to diversify our content and audiences. LiSTNR hosts a diverse library of over 800 podcasts from SCA's own creators and from leading local and international publishers such as Wondery, SiriusXM, Stitcher, Schwartz Media, and Diamantina Media. As well as attracting broader audiences

than traditional radio programming, this provides opportunities for advertisers to reach new and diverse consumer segments.

The growth in digital audio brings opportunities for us to know more about our audiences and to apply our knowledge to optimise and increasingly personalise the experience of each user on LiSTNR as well as to earn premium returns by helping advertisers connect to more targeted audiences. Our ongoing investment in LiSTNR is focused on delivering these outcomes for our audiences and advertisers; but it is equally focused on ensuring we do so securely to mitigate the risks of misuse of the information we collect. We continue to evolve our management of cyber security and privacy risks to lower the risk of our systems being breached and to ensure we respond quickly to minimise any adverse consequences if a breach occurs.

Even in an increasingly digital world, we continue to embrace our connections to local communities. Our people live, work, and actively contribute to their communities. Our radio and digital audio content is relevant to those local communities, and our advertising services support thousands of local businesses.

Our SCA Embrace charity program continues to work nationally with Make-A-Wish Australia and Foodbank Australia and, at a local level, with 33 charities operating in SCA's regional locations. In total, we've provided nearly \$30 million in-kind radio, digital and television advertising along with digital social, creative and research support, and staff volunteering. This has helped our supported charities to build awareness of their work, amplify their key messages, and boost their fundraising appeals.

Thank you for taking the time to read our FY23 Sustainability Report.

We would welcome your feedback via our mailbox: CompanySecretary@sca.com.au.





John Kelly
Chief Executive Officer and
Managing Director

Materiality Assessment

SCA conducted its first materiality assessment in early 2022.

In future, we plan to conduct materiality assessments approximately every three years to ensure our corporate strategy and operational model aligns with the expectations of stakeholders.

Process to identify material topics

The materiality assessment provided an opportunity for our people and other stakeholders to reflect on SCA's responsibilities and opportunities as a corporate citizen. We adopted a double materiality approach under which the assessment considered topics related to SCA's current and potential positive and negative impacts on the economy, environment, and people, as well as topics that have a current or potential positive or negative impact on SCA. The assessment included a peer review, megatrends analysis, assessment of key internal documents, a workshop with the executive leadership team, a business-wide employee survey, and interviews with a selection of our people, our major investors, and media.

The desktop analysis and stakeholder engagement informed development of a topic universe, and our senior leaders then applied a prioritisation methodology to set materiality thresholds and validate the assessment outcomes. Topics were also reviewed against GRI and SASB topic standards, and against the United Nations Sustainable Development Goals.

Findings

Ethical conduct, transparency, and corporate governance was the most material topic overall. Data management, use and security mattered most to SCA, while reliability and trust was especially important to stakeholders.

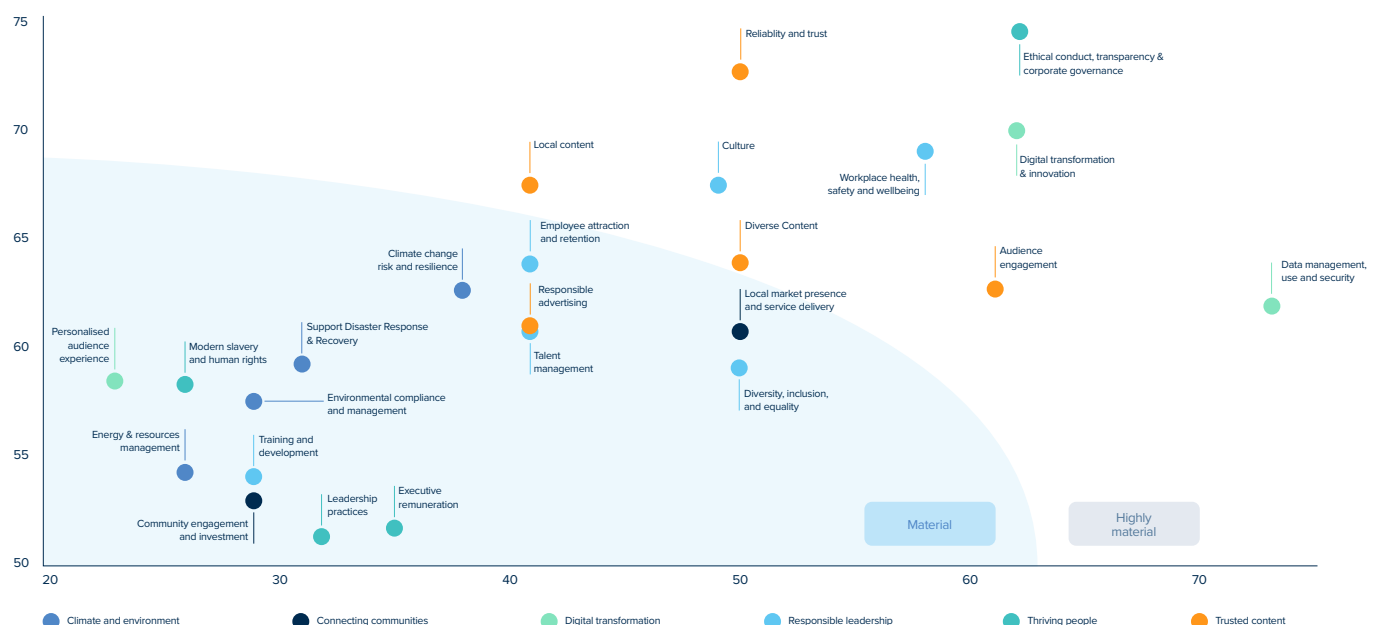
Local content and SCA's market presence and service delivery in local communities around Australia were highly valued by both the business and key stakeholders, including employees. Employees also see a responsibility for SCA to maintain a position as a trustworthy source of information and expect the business to proactively avoid spreading misinformation.

SCA's stakeholders value SCA's Proudly National, Fiercely Local approach. Our mission - To entertain, inform, and inspire Australians. Anytime. Anywhere. - is reflected in findings on the importance of reliable, trustworthy, diverse, local content, and audience engagement.

The shift towards digital transformation and digital products and the associated responsibility to properly manage, use, and secure personal information and other data mattered most to SCA.

Stakeholders, including employees, are increasingly interested in sustainability and climate change. They urged us to use our media platforms to share trustworthy information on climate change and reliable advice on how audiences can reduce their own negative impacts on the world around them. Stakeholders also saw an opportunity for SCA to reduce its negative environmental impacts, including through measurement of emissions, and implementing initiatives to reduce those emissions.

The materiality matrix below shows the material and highly material topics that emerged from the materiality assessment.



Materiality Assessment

We then organised these material and highly material topics under six themes to reflect SCA's operating environment. The outcomes of the materiality assessment, including these six themes, were presented to SCA's Board in May 2022.

Themes	Topics	Importance Category
Trusted Content	Local content	Highly material
	Diverse content	Highly material
	Audience engagement	Highly material
	Reliability and trust	Highly material
	Responsible advertising	Material
Thriving People	Culture	Highly material
	Workplace health, safety, and wellbeing	Highly material
	Talent management	Material
	Employee attraction and retention	Material
	Diversity, inclusion, and equality	Material
	Training and development	Material
Responsible Leadership	Ethical conduct, transparency, and corporate governance	Highly material
	Leadership practices	Material
	Executive remuneration	Material
	Modern slavery and human rights	Material
Digital Transformation	Digital transformation and innovation	Highly material
	Data management, use and security	Highly material
	Personalised audience experience	Material
Connecting Communities	Local market presence and service delivery	Material
	Community engagement and investment	Material
Climate and Environment	Climate change risk and resilience	Material
	Support disaster response and recovery	Material
	Energy and resource management	Material
	Environmental compliance and management	Material

This year, we have reported in accordance with the relevant Global Reporting Initiative (GRI) standards for our highly material topics.

In the year ahead, we will assess the requirements of IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures issued in June 2023 by the International Sustainability Standards Board to determine our future approach to sustainability reporting.

Trusted Content

We are a trusted source of information and entertainment for Australians.

We reach more than 95% of Australians through our radio, television, and digital assets. We recognise our responsibility to our communities to be a reliable and trusted source of information.

Local content

SCA is proudly national, fiercely local. Our 99 Triple M and Hit Network FM, AM, and DAB+ radio stations and 96 regional television stations, along with our LiSTNR digital audio platform, connect us to virtually every local community in Australia. And we are committed to providing compelling local content to every community we operate in. Our radio stations employ local announcers to broadcast local community voices telling local stories every day. Every week, our radio stations broadcast 2,400 local news bulletins around Australia.



Radio plays an important role in Australians' lives with commercial radio stations broadcasting 1.1 million hours of Australian content, 2.7 million Australian songs, 42,000 hours of news and 2,200 hours of emergency service content in 2022. Seventeen million Australians listen to commercial radio, 74% believe radio and audio build a sense of community and 58% have listened to hear emergency broadcasts.

Connecting Communities: the economic and social contribution of commercial radio and audio in Australia (Deloitte Access Economics, August 2023).

Our core competency and commitment to localism – in the content we create and distribute on LiSTNR together with the trusted way we engage with our physical and online communities – differentiates us from global technology platforms and services.

Although our regional television stations broadcast programming from our metropolitan program suppliers, we are committed to providing local news services for regional television viewers. The flagship is our daily one-hour live 7 Nightly News program in Tasmania. With around a 70 percent share of commercial viewing, this is the most viewed program in Tasmania.



We also produce 140 daily local news updates for broadcast in 17 regional markets. SCA's total local news output on weekdays is four hours and 34 minutes. These news services meet or exceed the local content obligations under the BSA. In Southern New South Wales, there are nine news updates each weekday in Canberra, Wollongong, Wagga Wagga and Orange. In Victoria, we broadcast a similar number of weekday news updates to Bendigo, Ballarat, Gippsland, and Albury/Wodonga. In Queensland, SCA provides nine news updates each weekday in Cairns, Townsville, the Sunshine Coast, Rockhampton, and Bundaberg. News updates are also produced for Darwin in the Northern Territory and across a large proportion of the central Australian region including the Northern Territory, Queensland, NSW, and South Australia through the VAST satellite network.

Trusted Content

Our content and news teams live in the communities we serve, ensuring our teams have the personal insight needed to tailor our content and connect with our listeners and advertisers.

We were disappointed due to economic considerations this year to discontinue the previous 30-minute news bulletin on weekdays on our Seven Network affiliated regional South Australia service. We made this decision after several years of representations to government by the country's leading regional media companies - including WIN, Prime Media Group, Australian Community Media, Imparja Television, and SCA - about the need for reform of regional media regulation. Current laws pre-date the Internet and are not suitable for contemporary media markets. With declining audiences and advertising revenues due to competition from online media (including the BVOD services of metropolitan television broadcasters), regional broadcasters are constrained by regulations that limit opportunities to innovate, operate more efficiently, and provide more meaningful careers for our people in regional Australia. At the time of deciding to discontinue our nightly news bulletin, we had been unable for some time to fill vacancies for two of our five employees. We were pleased to redeploy two of our remaining employees within our news operations, while the other received a redundancy package.

Our content and news teams live in the communities we serve, ensuring our teams have the personal insight needed to tailor our content and connect with our listeners and advertisers. Our people know which trusted community voices to emphasise, what news matters, and what stories are most relevant or interesting to their community.

Our audience reach is also highly valuable in case of emergencies. During emergency events, we keep our audiences informed throughout the day through broadcasting up-to-date and accurate emergency information. We maintain memoranda of understanding with emergency services in several states and territories to record protocols for communication of emergency information. Fifty-eight percent of Australians say they have listened to commercial radio to get access to emergency broadcasts.

After more than 40 mango seasons on the radio in paradise, and 31 waking up Townsville, Australian radio legend, Triple M Townsville's Steve 'Pricey' Price OAM announced he'll hang up his brekkie headphones at the end of this year. Of course, he's doing it in typical Pricey style, with a Thank You North Queensland Tour of eight live breakfast broadcasts across the region including Riverway, Ingham, Ayr, Bowen, Magnetic Island, as well as locations across Townsville. (And he'll be back to work on some special projects in 2024 that allow him a little longer in the hammock every morning!)

"I'm launching out of my 'little room of magic' to say a huge THANK YOU, for allowing me into your lives all these Mango Seasons! Happy Days are ahead, see you all on a Friday guys!"

SCA NQ Group Content Director Daniel Smith paid tribute to Pricey, "It's not often an entire city hears one voice for breakfast every weekday for over 30 years, but Townsville is different, and so is that voice because it's Pricey. He's a Triple M, Australian radio, and North Queensland legend."

Pricey has been involved in radio since he was 17, and has been in Townsville since 1982, hosting breakfast for three decades. He's visited Aussie diggers around the world in Afghanistan and Jerusalem, and has strengthened the shoulders of locals in times of crisis.

He was the first in the world to conduct an underwater radio broadcast (from Townsville's very own Reef HQ), and he was on the ground in one of the darkest days in Australian military history – the Townsville Blackhawk crash in 1996.

In 1998, it was Pricey who flicked the switch from AM to FM. He was there when the station became Triple M, when the Townsville Suns tipped off at the Furnace (1993), when they became the Crocs at The Swamp! (NBL - 1998) and when the Cowboys ran into Stockland Stadium for the first time in 1995.

In 2018 in recognition of his services to the community through his radio career, he was awarded the Medal of The Order of Australia (OAM) and last year he published his 200-page memoir called, *The Price Of Paradise*, which he describes as a love letter to NQ.



Trusted Content

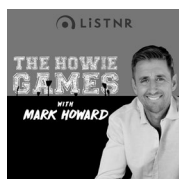
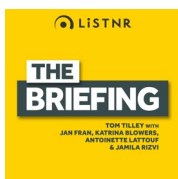
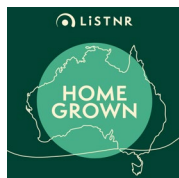
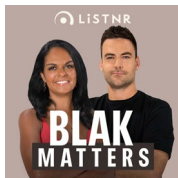
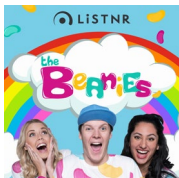
Diverse content

We develop tailored and targeted content to satisfy the diverse interests of our audiences around the country. For our radio and television stations, the diversity of our content is reflected in our commitment to localism. Our local shows target the interests of local audiences. Especially in metropolitan markets, our content is further targeted at specific demographic groups.

In Sydney, 2DayFM has partnered with Sydney's Gay and Lesbian Mardi Gras, aligning with our commitment to LGBTQIA+ inclusion.

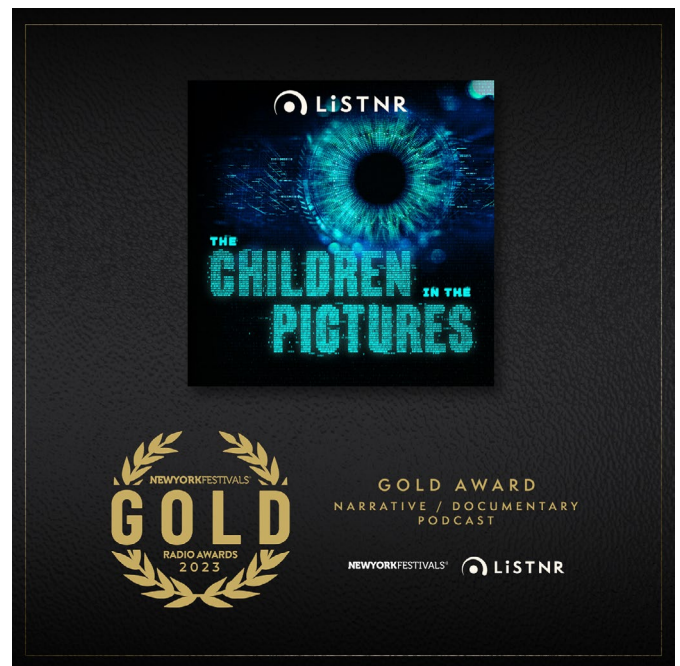


LISTNR and the growth of digital audio have opened new opportunities to diversify our content and audiences. LISTNR is also home to a diverse library of over 800 podcasts from SCA's own creators and from leading local and international publishers such as Wondery, SiriusXM, Stitcher, Schwartz Media, and Diamantina Media. This provides opportunities for advertisers to reach new and diverse consumer segments.



The Australian Podcast Ranker for July 2023 had Hamish and Andy as Australia's most popular podcast. Six other LISTNR podcasts in the top 20, and three LISTNR podcasts were the most popular Australian-made podcast in their genre (Comedy: Hamish and Andy; News: 7am, in partnership with Schwartz Media; TV and Film: The Streaming Service with Justin Hill).

We were proud this year that LISTNR's production of The Children in the Pictures won Gold at the New York Radio Festival Awards for best narrative documentary. This eight part series follows the Queensland Police investigation into notorious child exploitation website, The Love Zone, which hosted thousands of members around the world who created, uploaded, and shared videos and photographic material of unimaginable acts against children. The podcast powerfully examines how child abuse has become endemic online, and what we can all do to fight it. The Children in the Pictures won Gold against a shortlist of 30 of the world's greatest documentary makers including the BBC, ABC in Australia, ESPN, Crooked Media, iHeart Media in the US, and Radio Canada.



In the 2023 Radio Today Podcast Awards, LISTNR was judged Podcast Platform of the Year, Publisher of the Year and Company of the Year, as well as taking home individual awards for Hamish & Andy, Sports Bizarre, The Children in the Pictures, Blak Matters and Along for the Ride.

LISTNR is designed to help listeners discover a new world of premium, relevant audio, live or on-demand, and to enjoy it wherever they are.

Trusted Content

Understanding and building trust and loyalty with our audiences is key to our success. Our radio stations are part of their community.

Audience engagement

After the challenges of the lockdowns imposed by State and Territory governments to manage the spread of COVID-19 in 2020 and 2021, when audiences gravitated to talkback radio stations and away from entertainment formats like our Hit and Triple M Networks, we have been pleased to see audiences return to our radio stations in record numbers in the two years since.

Official radio surveys are conducted eight times a year in metropolitan markets, providing information about the size and demographic characteristics of our audiences, the time they spend listening and the devices they use to listen to our stations. CRA modernised its trusted metro radio audience measurement currency during the year. Radio 360 captures radio listening on all platforms and devices, anywhere, anytime. It incorporates data from regular audience surveys; streaming information from radio station websites, apps, and logs; and information from a 2,000-people panel wearing a watch meter that captures their radio listening. Delivering total, broadcast, and streaming audience figures for each metro radio station, Radio 360 provides the industry, media agencies and advertisers deep and accurate information about listening behaviour and the size of the digital opportunity.

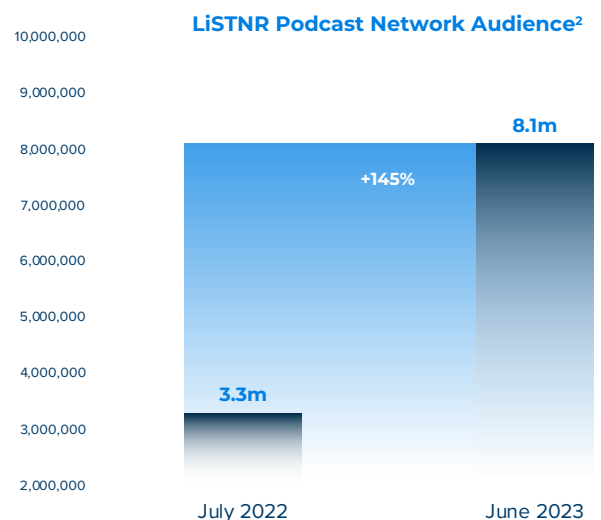
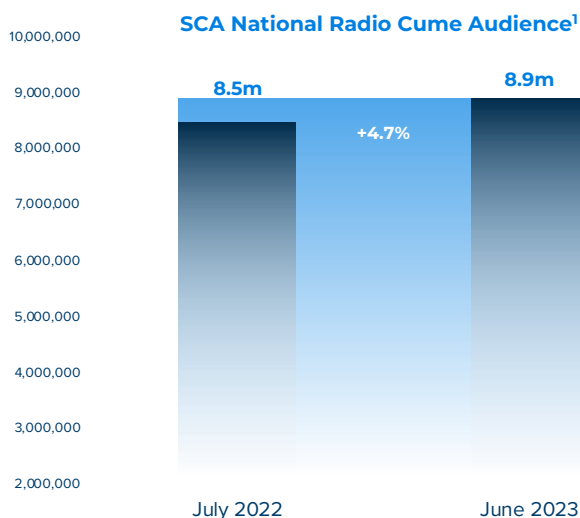
In the most recent official radio survey 5 published in August 2023, the cumulative audience of SCA's Hit and Triple M stations in the five Metro capitals was 6.142 million people. This was our highest cumulative audience ever. Including SCA's Hit and Triple M stations in regional Australia, we have a total radio audience of over 8.89 million Australians, up 4.7% in the past year. Coupled with LiSTNR's Australian podcast audience network of eight million – up 145% on a year earlier – SCA offers compelling audio reach for advertisers.

Newcastle Triple M's Tanya Wilks of the Tanya & Steve Breakfast show was named on the 2023 Australia Day Honours list for her services to broadcast media and the community.

Tanya said she was humbled by the award. "A great many people work tirelessly for others in our community and not everyone gets the recognition they so richly deserve so I'm aware of how special this is, and I shall always cherish it with pride."

SCA Group Content Director – Newcastle, Jase Allen, said, "Tanya Wilks OAM is one of a kind and for over 20 years has devoted herself to making the lives of Novocastrians better, from representing the community at countless organisations, setting up charities and being the top rating and number one voice in Newcastle since her debut on the airwaves."

Congratulations Tanya, we're honoured to have you on the Triple M team.



¹ GfK Radio Ratings. Survey 5 2022 to Survey 4 2023. All People¹⁰⁺. Mon-Sun 0530-2400

² Triton Australian podcast ranker top sales representatives July 2022 to June 2023 Monthly Listeners

Trusted Content

In survey 5, SCA also had top ranking FM Breakfast shows in three of the five surveyed capital cities: Fifi, Fev and Nick on The Fox, Melbourne; Stav, Abby, and Matt on B105, Brisbane, and Roo, Ditts and Loz on Triple M, Adelaide.

We build engagement with our audiences with on-air competitions and activations, while maintaining a lively presence on social media pages for our leading shows and brands. Some of this year's highlights were:

- The Fox's Fifi, Fev and Nick Breakfast show travelling through the suburbs from Mentone to Frankston, hosting another Big Night Out with listeners in Las Vegas, and claiming the official Guinness World Record® for Longest marathon for a radio music show DJ (team)
- Brisbane's B105's Stav, Abby and Matt Breakfast show hosting a 'Bris-Vegas Wedding' for local couples, creating the now famous Brisbane Brown Snake with Allen's Snakes Alive confectionery, turning the Prime Minister Anthony Albanese into DJ Albo, and taking to the streets for Santa in the Suburbs
- Erin Molan from 2Day FM's Hughesy, Ed and Erin Breakfast show staging the Wedding of the Year in which Erin and eight other lucky brides committed to honour themselves by marrying themselves
- The Carrie and Tommy national Drive show taking lucky listeners to Paris to attend the P!NK concert.



Trusted Content

Our podcast hosts typically have highly engaged audiences who choose to listen to our podcasts because of a connection to the host or the topics covered by the host. We encourage and build this engagement through social media interaction with podcast audiences. Highly engaged podcast audiences, coupled with advertisements read by our podcast hosts, provide a premium advertising proposition.

The Australian Podcast Ranker, of which SCA was a founding member, now provides monthly data on both listeners (reach) and downloads (frequency), helping media buyers to plan and value their investment in digital audio inventory.

In addition to these and other external sources, SCA has an internal centralised hub for media research and insights housing data from more than 300,000 SCA listeners around Australia, who provide first-party data and behavioural insights. SCA iQ conducts more than 100 studies each year helping our Commercial and Content teams and our advertising partners to develop powerful, insightful solutions.



Reliability and trust

SCA prides itself on being a trusted and reliable source of information and entertainment.

SCA holds a licence under the Broadcasting Services Act 1992 (BSA) for each of its radio and television stations around Australia. The Australian Communications and Media Authority (ACMA) issues standards and other guidelines under the BSA relating to a range of matters including minimum requirements for broadcast of local content on regional radio and television stations and for broadcast of Australian and children's content on television stations. Our peak industry bodies - Commercial Radio and Audio (CRA) and Free TV Australia (Free TV) - have published Codes of Practice that also have regulatory standing under the BSA. These Codes provide mechanisms for our audiences to complain if they believe our content breaches the Codes, and the ACMA has power to investigate suspected breaches of the Codes or ACMA's standards. If it finds that a breach has occurred, the ACMA has power to impose conditions on our licences or to suspend or cancel them.

We have detailed policies and processes about our broadcasting responsibilities. These are available to all employees on MyNet. On induction and annually, we provide training about our broadcasting responsibilities to on-air, production and other employees and contractors. Relevant policies cover content risk assessment, child safe code of conduct, dealing with minors and vulnerable people on-air and online, and pre-recording of content, use of delay, guidelines for working in delay, and testing of system delay procedures.

We also provide training and advice on responding to listeners with sensitive or difficult issues to ensure our audiences and our people are looked after properly.

Day-to-day, our on-air teams discuss and plan content before going to air. This planning is designed for our teams to identify risks associated with planned content and other activities and to take appropriate steps to eliminate or mitigate those risks. These steps might include seeking legal or other professional advice about controversial topics to be discussed on air.

When something goes wrong on air or on one of our other platforms, we address it with the relevant content team. Actions include refresher training tailored to the particular concern, reminding production teams to review risky content in advance with the legal team, and disciplinary actions including standing down announcers for a period, formal warnings, and termination of employment. We emphasise to radio producers they will never be criticised for applying a seven second broadcast delay where they are unsure about the appropriateness of content.

Our News Editorial Policy sets out our expectations for ethical practice in the creation and delivery of news content. News editors monitor editorial ethics by conducting regular script reviews and airchecks with journalists. Story selection, angles, and interview talent are discussed to ensure ethical decision making is part of daily workflow. We emphasise the importance of fact-checking, impartiality, and balance in creating news content. Every year, news staff complete CRA Code compliance training and participate in a masterclass offered by SCA's legal pre-publication team. News team members also have access to SCA's headline news style guide and best practice guides from Media Diversity Australia for reporting on Aboriginal and Torres Strait Islander peoples and issues, and on disability.

Protection of children

We apply a "kids in the car" test for our radio shows, requiring announcers to avoid topics not suitable for children during typical school drop-off and pick-up times. Some of our late-night radio shows discuss sexual topics. Our night-time show announcers are trained on CRA Code 2.4 which requires them to provide listeners with advance warning about sexual topics. We also encourage our radio announcers and podcast creators to provide advance warnings whenever they will discuss distressing topics on shows, news bulletins, or podcasts.

We are guided by our Dealing with Minors and Vulnerable People On-air and Online Policy. We abide by applicable state and federal laws relating to employing children. When working with minors, we provide parents and legal guardians a copy of SCA's Child Safe Code of Conduct, which outlines expected behaviours when we interact with minors. Minors are required to obtain parent or guardian consent to participate on air or in any recordings through the signing of a performance release.

Under our Kinderling brand, we provide specialised content for children on LiSTNR and on the Kinderling app. We also ensure our content is labelled properly to protect minors from age-inappropriate programs and content. Advertising and content are both carefully scheduled and monitored to protect our vulnerable audiences, including children.



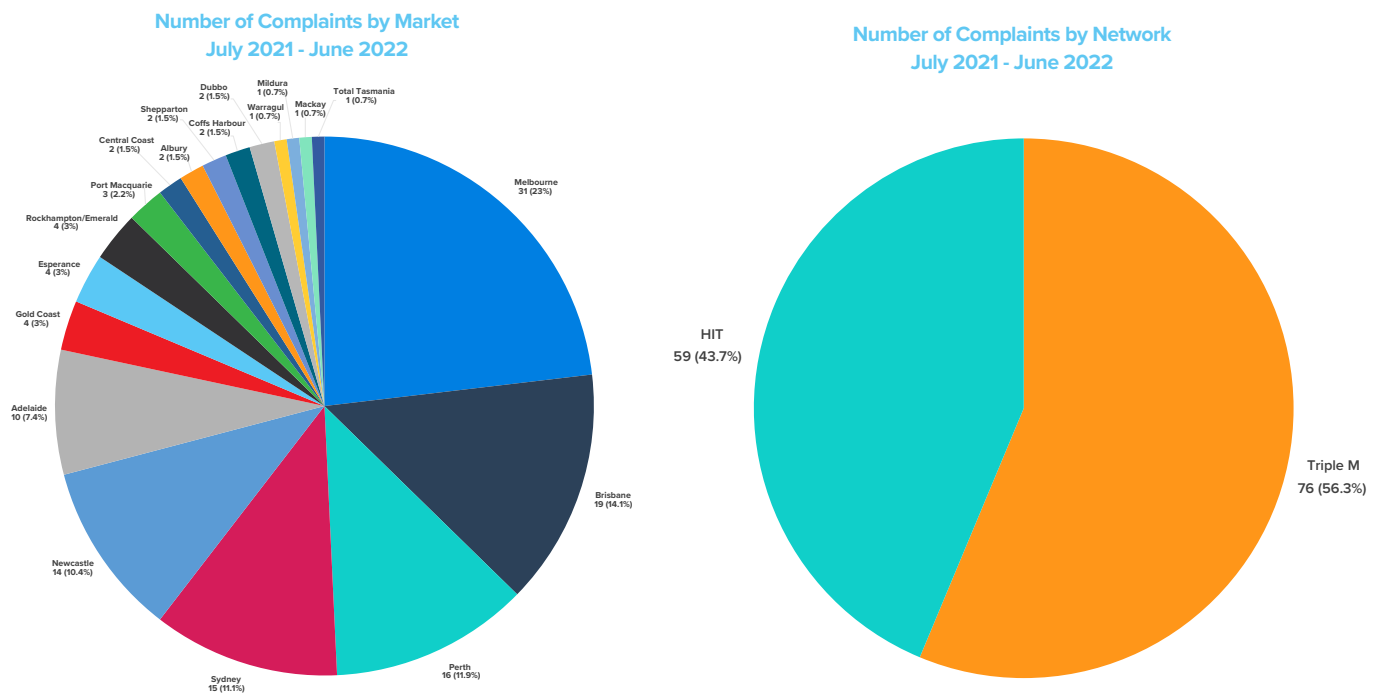
Trusted Content

Complaints about broadcast content

The CRA and Free TV Codes set out standards for on-air content, covering areas including decency, discrimination, advertising, working with children, content involving tobacco, alcohol or gambling, and emergency services broadcasting obligations. The CRA and Free TV Codes allow consumers to lodge a complaint if they believe a broadcaster has breached a Code requirement and require broadcasters to respond to complaints within 30 days. The ACMA can investigate potential breaches of the Codes either on its own initiative or in response to a lodged complaint. The ACMA can take disciplinary action, such as imposition of additional conditions on a broadcasting licence, if a breach is established.

We regularly air community service announcements that discuss the CRA and Free TV Codes and explain the complaints and escalation process for consumers to raise concerns about our broadcast content. Complaints in relation to advertisements will generally be referred for response by Ad Standards.

We have a target of zero breaches of the CRA Code. We emphasise this in training sessions for on-air teams; but also acknowledge that we should expect to receive a small number of complaints each year due to the nature of creating interesting and engaging content. (As an affiliate television broadcaster, we do not control the content supplied by our metropolitan program suppliers. When we receive complaints about television content, we collaborate with the applicable program supplier in investigating and responding to the complaint.)



We have comprehensive internal procedures to ensure complaints about broadcast material are investigated and responded to and, where necessary, to ensure corrective action is taken. We report on the number and categories of complaints received to the Board's Audit & Risk Committee every six months, including whether any have been investigated by the ACMA. In FY23, we received 135 complaints and two ACMA investigations with no breaches identified.

We received a lower number of complaints relating to on-air radio content in FY23, compared to the preceding two years. This is despite our audiences continuing to grow strongly.

Year ending 30 June	Triple M Network		Hit Network		Metro		Regional	
	Complaints	Code breaches	Complaints	Code breaches	Complaints	Code breaches	Complaints	Code breaches
2023	76	0	59	0	91	0	44	0
2022	176	0	70	0	185	0	61	0
2021	131	0	59	0	140	0	50	0
2020	87	1	58	0	106	0	39	1
Average	118	0.3	62	0	131	0	49	0.3

Trusted Content

Oversight of user-generated content and user conduct

SCA owns, manages, and operates over 300 social media channels. Every day, we produce a large volume of digital content to engage with our audience - which prompts a corresponding volume of user-generated content. User-generated content is any text, videos, images, reviews etc. created by our audience rather than us; this may include engagement like comments.

User comments are regularly monitored and moderated in accordance with our Social Media Comment and Moderation Policy. Our team is equipped with various social media management tools and systems to manage this user-generated content and escalate our response as needed.

Our legal team and other senior stakeholders are briefed on how to handle negative situations related to user-generated content. Actions taken will be dependent on the scale of the brand or commercial effect on the business or the broader community.



Music

SCA's broadcast radio formats are music-based, and we have created many music-based livestreams and programs on our new LiSTNR app. Supported by consumer research, our music content teams are expert in curating playlists that appeal to our Triple M, Hit Network, and LiSTNR audiences with nuances for our radio stations in different cities or regions.

In 2022, Australian commercial radio stations broadcast over 160,000 hours of Australian music, equating to around 2.7 million Australian songs.

Connecting Communities: the economic and social contribution of commercial radio and audio in Australia (Deloitte Access Economics, August 2023)

Triple M was named Licensee of the Year by APRA AMCOS in 2022. The award is assessed by APRA's Board of Writer and Publisher Directors and acknowledges good music citizenship. Triple M was selected against the criteria of consistent compliance and demonstrated support of music such as the presentation of local content or innovative use of music. Triple M has been a staunch advocate of Australian music and artists since its launch in 1980 and our 49 Triple M stations continue to proudly feature homegrown music from established artists to the newcomers.



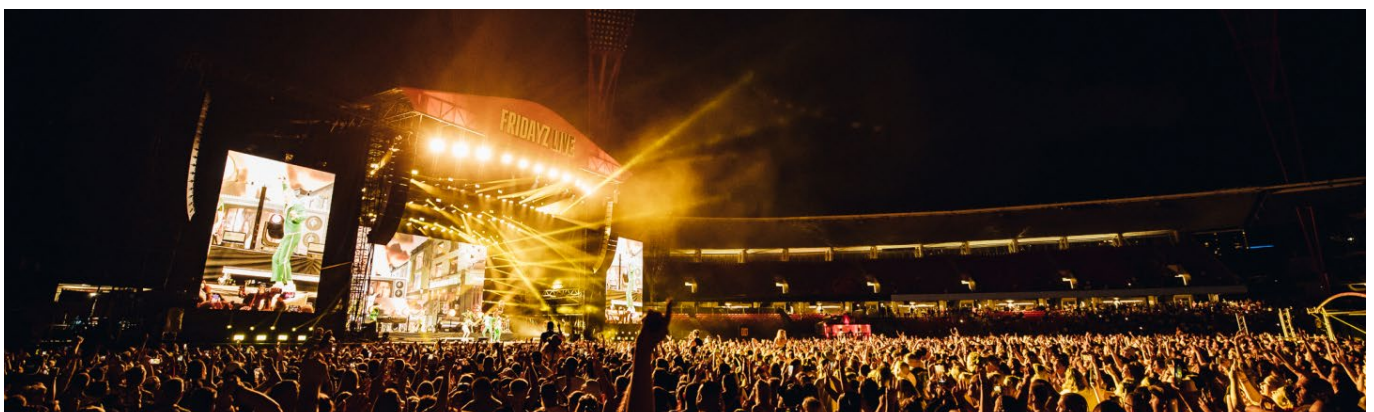
The Hit Network recently announced its continued partnership with Mushroom Group with RnB Fridays Radio presents: Fridayz Live. The tour brings back Australia's biggest party with global acts taking to the stage around the country and hosted by Abbie Chatfield and Fatman Scoop.

We respect the rights of songwriters, composers, performers, and their record labels who help us to entertain, inform and inspire our audiences. In Australia, most popular music is licensed by two organisations that represent music rights holders, APRA AMCOS and PPCA. SCA holds licences from APRA AMCOS and PPCA covering the broadcast, livestreaming, and other uses of popular music on our radio networks, television stations and on our websites, along with LiSTNR and other music apps.

We pay licence fees to APRA AMCOS and the PPCA based on a percentage of revenue related to our music use and in some cases based on the number of times each song is livestreamed.

SCA also licenses music for other uses important to our business including:

- to organise concerts and other events
- to play our radio stations in our offices and for on-hold music on our telephone systems
- to incorporate "production music" such as jingles and sonic logos on our radio stations or in radio, television, or online commercials.



Trusted Content

Responsible advertising

As a reliable and trustworthy source of information and entertainment, we understand the advertisements we communicate also need to align with our values and responsibilities as a broadcaster.

We carefully consider which advertising opportunities are selected for communication on our platforms. We trust content directors to know their brand and their values and to collaborate with sales teams to ensure advertisements are consistent with those brand values.

The most powerful form of advertising on our radio and digital audio platforms is integrated content in which our radio announcers or podcast hosts discuss or perform scripted advertisements about a client's products or services while identifying the content as advertising. At the time of contracting our announcers and podcast hosts, we discuss and record any product or service categories for which they prefer not to perform integrated content. We do not want our announcers and podcast hosts to feel pressured to promote products and services not aligned with their own values.

Occasionally, we authorise third parties to sell advertising on our radio and digital audio platforms. For example, in 2016 we entered a long-term agreement for Australian Traffic Network (ATN) to provide traffic updates for our metro and regional radio audiences. In return, we have authorised ATN to sell 10-second advertisements (known as "tags") for broadcast on our radio stations at certain times of the day. To ensure consistency with our brands and values, our contract with ATN requires that its tags must not contain news or current affairs material nor any political, religious, economic, or social comment, statement, or opinion, be from any political party, trade union or related organisation or religious organisation, or from persons advertising or promoting any adult (i.e., sexual) product or service.

We participate in several digital audio exchanges under which media agencies and advertisers can bid in real time to insert advertisements in our digital audio content, using data about the typical demographics of the relevant audience. Using filters available in these exchanges, we exclude advertising for products or services that are inconsistent with SCA's brand values or otherwise not suitable for our audiences.

We take a common-sense approach to content and advertising, especially during "kids in the car" times. For our radio content, the CRA Code does not require classification of advertisements, but SCA has proactively established which types of advertisements are not suitable for children (e.g., alcohol, sexual or adult products). We do not allow broadcast of advertisements for these products and services during school drop-off and pick-up hours. For our TV content, the Free TV Code requires classification of advertisements which reinforces SCA's commitment to only broadcast appropriate advertising during children's viewing hours.

Just like any other work or content involving children, the principles of our Child Safe Code of Conduct, dealing with minors and vulnerable people on air and online, and Content Risk Assessment Policy apply to our review of the advertising we air.



Thriving People

Healthy, happy, thriving people are at the heart of our business.

Our people are what makes SCA one of Australia's leading media companies. From fostering a collaborative and supportive culture to keeping our team safe, healthy, and well, we are committed to supporting every member of our team to thrive.

Culture and Values

Culture

At SCA, culture is “the way we do things around here”. We work hard to create and maintain a culture that supports our people to thrive.

Since 2016, we have worked with Human Synergistics, a global organisational development consultancy, to measure our culture. Human Synergistics conducts Organisational Culture Inventory (OCI) surveys to assess inherent behaviours and styles that govern the way people interact and work with each other. We were proud after our most recent OCI survey in 2021 that Human Synergistics awarded SCA its Culture Sustainability Award for maintaining and growing a highly constructive culture that outperforms our peers. Our next OCI survey will take place early in 2024.

SCA's Code of Conduct sets out our values and the behaviours we expect of our people as they represent SCA. We require all employees to read and sign our Code of Conduct when they join SCA, and we also build the Code of Conduct into our agreements with regular contractors such as the hosts of our leading radio shows and podcasts.

SCA YourWay



We believe collaboration gets the best outcomes for SCA and for our clients and communities and that collaboration is best achieved by people working together in person. For these reasons, we ask our people to work most of their time in the office. This requires full time employees to work from our offices at least three days per week. Our Content teams typically spend all their time in our offices or studios and, because of the importance of our Commercial teams working closely with our Content teams and with our clients, we ask our Commercial teams to work at least four out of five days in the office.

Within this framework, our flexible work framework SCA YourWay empowers employees and their teams to negotiate work arrangements that best meet SCA's business objectives and each employee's wellbeing, professional performance and development. We support arrangements such as flex hours, micro-flex, team flex, remote working, purchased leave, job-sharing, part-time working, transition to retirement, and informal flexibility to suit employees' individual needs and circumstances.

SCA YourWay has provided many benefits including an improved experience for return-to-work after parental leave, as well as support for physical and mental health. As mentioned below under Diversity and Inclusion, we will work in the year ahead to ensure it is applied consistently around our business.

SCA PulseCheck

Since February 2022, we have conducted periodic PulseCheck surveys to capture employee sentiment and identify trends and correlate results with business changes. PulseCheck is designed to send a positive message to employees that their opinions are valued, and this includes reporting to employees on feedback from each survey and the initiatives to be implemented in response.

We used the data collected from our most recent PulseCheck in August 2023 to inform the priorities in our diversity and inclusion strategy and our learning and development program for FY24.

Values

Prompted by the digital transformation of our business in recent years, and the resultant changes in our workforce, we conducted a series of workshops with our people to review our corporate values. Our new values are a contemporary evolution of our previous values and are designed to state our people's expectations for themselves and each other and guide our day-to-day decisions and behaviour towards achieving success for SCA.

- **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 care 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 to deliver results. We learn from our mistakes.
- **We Push Doors Open:** We push open doors to unlock new opportunities. We identify both problems and deliver solutions. We drive outcomes and achieve what we set out to do. 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.

PEOPLE
ARE OUR
POWER

BE
GENUINE

ALWAYS
CURIOUS

WE PUSH
DOORS
OPEN

WE'RE
BETTER
TOGETHER

Thriving People

Workplace Health, Safety, and Wellbeing

Workplace health and safety

SCA's Board has adopted a Workplace Health and Safety Policy confirming that SCA has no tolerance for harm, either physical or psychological, to our employees or other people because of SCA's operations. The policy states the Board's expectation that SCA will actively manage workplace health and safety risks to eliminate the risk of harm and, if harm occurs, to minimise it and improve the management of similar risks in the future.

The policy sets the foundation for our workplace health and safety management system which includes many more specific operational policies and checklists to guide and direct our employees' and contractors' daily activities. We make these materials - covering topics such as COVID safety, manual handling, office safety and ergonomics, bullying and harassment, dealing with distressed callers, location risk checklists, and safe driving - available on MyNet.

These operational policies and checklists are supported by training provided on induction and annually thereafter. We also provide on-site induction to visitors and contractors via our contractor management system, SINE.

Conducting stunts, events, and promotional activities is an important part of our commercial activities. Our teams prepare specific risk assessments for these activities to ensure appropriate steps are taken to mitigate the associated risks. These risk assessments include appropriate consultation with our WHS representatives, inhouse legal team, and insurers. In most cases, these risk assessments are reviewed and approved by responsible managers and stored on MyNet.



We encourage our people to communicate any WHS hazards and incidents to local WHS representatives. Our local WHS representatives meet quarterly and feed into state-wide WHS meetings which, in turn, feed into our national operational risk committee. These meetings discuss WHS hazards and incidents and agree strategies to mitigate risks and reduce harm. The national operational risk committee reports quarterly to SCA's Board.

WHS statistics

Selected WHS statistics for the most recent reporting period (1 April 2022 to 31 March 2023) are provided below.

Measure ²	No.
Lost time Injuries	5
Injuries requiring attention by medical professional	17
Injuries requiring basic first aid attention	6
Fatalities	0
Lost days ³	107
Lost Time Injury Frequency Rate ⁴	1.55

Promoting mental health and wellbeing

We are committed to helping our people with mental health risks, whether they are work-related or not. To that end, we developed a mental health strategy in consultation with BeyondBlue. The strategy recognises that the always-on and public nature of a media business brings challenges for our people's mental health.

The SCA YourWellbeing portal on MyNet includes information and resources to help employees connect with and manage their mental health. It includes videos, podcasts, and links to information about how to recognise, manage, and seek advice about stress, anxiety, and depression, as well as the benefits of meditation, exercise, nutrition, and other healthy practices.



We train managers on how to identify the signs of stress and mental health struggles and to take actions to support their teams in maintaining their wellbeing.

We retain organisational psychologists to support our Content teams. This is valuable for Content teams who often need to deal with distressing stories on air or in podcasts, or via listener engagement on social media.

In addition, our Employee Assistance Provider (EAP) Drake WorkWise provides our people with free and confidential access to counselling.

² Injuries are those occurring because of a workplace incident, and do not include commuting or recess injuries.

³ Lost days are workers compensation leave because of a workers compensation claim being approved or under consideration.

⁴ LTIFR is [Number of lost time injuries in the reporting period] x 1,000,000 / [Total hours worked in the reporting period].

Learning and development

We require all employees to complete induction training that provides an overview of SCA's business and informs our people about SCA's and their own responsibilities in relation to the CRA and Free TV Codes, social media, equal employment opportunity, and workplace health and safety. This is reinforced in annual compliance training.

SCA Your Workplace Masterclass

The SCA Masterclass series is an opportunity for our leaders to share trends, ideas, advice, and updates in their area of expertise. Masterclasses are conducted monthly and are open to all staff, connecting our people wherever they are working.



We have engaged an external consultant to conduct workplace behaviour training for our managers. These sessions address ethical conduct and workplace health and safety requirements for managers, with the objective of fostering a workplace free from bullying and harassment and in which our people feel safe and empowered to speak up and participate. We encourage feedback from our employees after these sessions so we can continue to improve and review our grievance training and processes.

The Upload

The Upload is SCA's performance review system. At least twice a year, our people participate in an Upload conversation with their direct manager to review their recent performance, set goals for the next period. This approach fosters a culture of ongoing feedback and development.

As part of The Upload, SCA encourages people managers and their teams to identify individual training and development needs. In turn, SCA supports development plans to achieve individual professional objectives and SCA's business objectives.

We also invest in bespoke learning and development for the needs and responsibilities of individual roles. In many cases, we work with specialist trainers and advisers to help design and deliver training courses. Alongside training on business practices, we deliver training to support our people in their roles and as they move throughout SCA. We pride ourselves on our 50% internal mobility, giving our people opportunities to forge meaningful careers at SCA. To support this, we focus on leadership training to prepare our people for management and leadership roles.

We provide a mix of national programs for leaders and their teams, as well as a range of sales and general training that can be customised for the needs of specific teams.

The sections below provide information about some of our training and development programs that will operate in FY24.

SCA LEADS

People & Culture Team

This program provides our people leaders and emerging managers with strategies to engage and motivate employees, create a constructive culture, raise performance standards, and retain high achievers.

SCA MINI MBA

Australian Institute of management

An intensive program to equip professionals with essential MBA knowledge and tools. Led by industry experts and academics, the program delves into strategic management, finance, marketing, innovation, and leadership.

EXECUTIVE COACHING

Coaching Panel

Personalised one-on-one coaching for senior leaders and high performers across the business. Participants are paired with an executive coach to identify and leverage strengths, tackle challenges, and develop a plan for personal and professional success.

LINKEDIN LEARNING

LinkedIn

A library of expert-led courses, covering topics such as leadership, communication, technology, and project management. Employees choose the areas they want to explore and master to achieve their career goals.

LEADING TEAMS & MANAGER TRAINING

Leading Teams

Learn the value of creating genuine conversations and strong professional relationships to drive a high-performing team to achieve its purpose.

MENTOR PROGRAM

People & Culture Team

Mentoring helps personal and professional development. Mentees have an opportunity to learn from our leaders over a six-month program.

Learning and development

Succession planning

Our People and Culture team facilitates annual succession planning with SCA's Senior Leadership Team. Through this process, the leadership team identifies high-performing and high-potential employees, and potential successors for critical business roles and on-air radio roles. Tailored development plans are then implemented to support these employees to develop and address gaps in their skills, knowledge, or ability. The Senior Leadership Team also records external candidates who might be suitable for future vacancies in senior executive or on-air radio roles.

Talent management

On-air and podcast talent is central to the entertainment and information we offer Australians. They are the frontline representatives of our values, and we hold them to a high level of professionalism. All talent complete compliance training and on-air training. This training has recently been expanded to also cover values and behavioural expectations.

Just as we have expectations for our talent, we also have expectations for ourselves. We aim to be an employer of choice for talent through our values, leadership practices, and content offerings.



Diversity, inclusion, equality, and belonging

SCA's commitments

With a footprint across 95% of Australia, SCA has diverse audiences. To succeed, our organisation needs to reflect the communities we work in, talk to, and serve, and provide fair and equitable practices for attracting, developing, retaining, and rewarding talented people.

SCA's Board has adopted a Diversity Policy that states our intention to have a diverse and inclusive workplace where:

- everyone is valued and respected for their distinctive skills, experiences, and perspectives
- structures, policies, and procedures are in place to assist employees balance their work, family, and other responsibilities effectively
- recruitment processes and decision-making consider diversity
- employees have access to opportunities based on merit
- the culture is free from discrimination, harassment, and bullying
- employment decisions are transparent, equitable and procedurally fair.

The policy is overseen by the Board's People & Culture Committee which receives regular reports from management about diversity and inclusion initiatives.

Gender equality targets

In April 2022, SCA became a signatory to the 40:40 Vision, strengthening our commitment to achieving gender balance (40:40:205) in executive leadership by 2030.

The gender composition of SCA's people is summarised in the tables below.

Board and workforce by gender (including Board targets for 2024 and 2027)

Category	% Women		Board target for women		
	30 June 2021	30 June 2022	30 June 2023	30 June 2024	30 June 2027
Board (non-executive)	43%	43%	33%	40%	40%
Board (all)	38%	38%	28%	40%	40%
Senior leadership team	14%	29%	29%	25%	40%
Senior management	40%	35%	43%	45%	50%

Workforce by gender

Employment status	Female	Female %	Male	Male %	Total ⁷
Full Time Permanent	731	51%	713	49%	1,444
Part Time Permanent	128	91%	12	9%	140
Fixed Term	35	54%	30	46%	65
Casual	145	44%	188	56%	333
Total	1,039	52%	943	48%	1,982

Workforce by age

Age	Female	Male	Total	Total % ⁷
<25	114	70	184	9%
25 - <35	412	340	752	38%
35 - <45	307	271	578	29%
45 - <55	146	150	296	15%
55 - <65	50	96	146	7%
>65	10	16	26	1%
Total	1,039	943	1,982	100%

⁶ Senior management refers to SCA's Executive Leadership Team (excluding the Senior Leadership Team), comprising 37 employees on 30 June 2021, 39 employees on 30 June 2022, and 29 employees on 30 June 2023. Middle management roles refer to all other roles with "manager" in their title.

⁷ Totals do not include 10 employees who do not identify as male or female.

Diversity, inclusion, equality, and belonging

SCA is committed to supporting women in leadership. We are a partner of the Women and Leadership Australia program (WLA), a national initiative supporting a higher representation of female leadership throughout the Australian workforce. Designed to support existing female leaders and propel them towards executive level performance, behaviours, and mindsets. It is segmented into modules, including leadership and authenticity, communication, presence, and influence. Every year, 10 SCA executives take part in the program. These executives also partner with mentors from around SCA's business to share their learning, support one another, and ensure active succession planning.

SCA is a partner in Future Women's job academy program which provides mentoring, guidance and networking support for women returning to work after a break.

Enhanced paid parental leave

On 1 July 2023, we launched enhancements to our paid parental leave scheme. Subject to a minimum service period of one year, our permanent employees (regardless of gender) are now entitled to:

- twenty weeks leave for a primary carer (previously four weeks for one to three years' service and six weeks for over three years' service)
- four weeks leave for a secondary carer (previously two weeks).

Parental leave covers birth, adoption, surrogacy, and stillbirth, and is in addition to the federal government's paid parental leave scheme.

Improving our diversity and inclusion performance

In January 2023, SCA engaged Diversity Partners to assess SCA's diversity strengths and opportunities to a Diversity and Inclusion Strategy with associated action plans and success measures.

Our most recent SCA PulseCheck in August 2023 returned the following results in relation to diversity and inclusion:

I believe SCA fosters a diverse and inclusive workplace	76%
I believe SCA hires and promotes people from diverse backgrounds	65%
I believe SCA supports equality between genders	78%
I feel like I belong at SCA	76%
I have as equal an opportunity to progress my career at SCA as others do	68%

The assessment involved qualitative and quantitative research including interviews with Senior Leadership Team members; six focus groups with employees (including a wholly female group and a wholly male group); review of workforce data, policies, and processes; and industry benchmarking in Australia and globally. Relevant benchmarking criteria included integration of diversity and inclusion principles in recruitment, leadership visibility, symbols to build allyship (such as pronouns and undertaking an Acknowledgement of Country), integrating diversity into SCA's products (radio, podcasts, and external collateral), as well as consideration of diversity in procurement. The assessment considered representation of diversity (gender and gender identity, cultural background, Aboriginal and Torres Strait Islander, LGBTIQ+, age, and disability) across SCA's workforce, and opportunities to enhance diversity

to be more representative of listeners, and the Australian population.

The assessment by Diversity Partners found strengths and opportunities for improvement in our diversity and inclusion practices. These are summarised below.

Diversity and inclusion strengths

People are proud to work for SCA

There is a genuine passion for an environment where inclusion is felt by everyone. Reflected in internally led activities such as Pride Month celebrations and International Women's Day celebrations. SCA YourWellbeing encourages people to speak up and feel safe to talk about mental health.

79.6% of employees either agreed or strongly agreed that SCA fosters a diverse and inclusive workplace.

Executive comments:

"Our culture has a foundation of people feeling safe. We have robust conversations, we seek to understand, and we ensure everyone feels heard."

Focus group comments:

"I love the people and the culture here. There is so much variety every day."

"I can be myself every day. I love the people here."

"I am so heartened by this conversation today. Now we need to see concrete action."

Commitment and progress on gender equality

SCA has targets to achieve gender balance at all levels.

We have implemented diverse and inclusive hiring practices to combat any bias. SCA's job advertisements welcome candidates who need accessibility support and adapt the environment accordingly. We train our managers on diversity and inclusion, covering hiring management practices. We also prioritise diversity and inclusion when hiring for leadership roles, where we require a diverse short-list of candidates to be considered.

SCA YourWay provides guiding principles for hybrid working

SCA's flexible work framework recognises employees need flexibility to be productive and perform at their best. Team charters ensure consistency in application and employees have been trained on what SCA YourWay means. Focus groups confirmed support for the policy but found inconsistency in its application.

Executive comments:

"We run flexibility based on trust. There is an inherent deal in this that people don't let us down."

Focus group comments:

"I love the SCA Your Way Policy. It has made a huge difference to culture."

"SCA Your Way can feel that its 'your way, our way'. It is inconsistent in how it's applied and depends on your role, your office, and your leader."

Diversity, inclusion, equality, and belonging

SCA YourFamily strengthens SCA's commitment to support carers

Recent enhancements to SCA YourFamily provide a more inclusive and gender-neutral approach to support parents, offering 20 weeks of paid parental leave to primary carers and four weeks to secondary carers. There are opportunities to modernise other policies to strengthen SCA's commitment to diversity.

Opportunities for improvement

Improve communication and governance of diversity and inclusion strategy

SCA did not have a formal diversity and inclusion strategy. Activity appears ad hoc and not aligned to strategic priorities. Aside from gender and age, SCA lacks workforce demographic data to measure current state and track progress

Executive comments:

"We aren't as proactive as other organisations. We don't beat the D&I drum all the time. But we are cognisant of diversity and need to take a more disciplined approach."

Focus group comments:

"We need a pathway and a plan. I would love accelerated change to come from this."

Enhance visible commitment to diversity and inclusion

While SCA's leaders state commitment to diversity and inclusion, there is an opportunity to strengthen visible symbols of support. Sexual harassment claims are relatively few, but there is a perception that perpetrators have been allowed to "leave quietly" with a missed opportunity to state SCA's zero tolerance policy.

There is perceived to be a lack of diversity in on-air radio talent and podcast hosts, and in marketing billboards and posters. Diversity is not hardwired into supplier principles.

Executive comments:

"We have tried to improve the diversity in the commentary team (call box) but it's still not as diverse as we would like."

"We need to push our talent to be provocative, so that they engage the audience, stand out and push the listeners' emotional buttons. But we have to catch them if they fall off the cliff. But, if its repeated behaviour, we don't tolerate it."

Focus group comments:

"We never ever do an Acknowledgement of Country. We should be doing this at significant meetings and for particular radio segments and podcasts."

"We must have more diverse voices in radio and on podcasts."

Build leadership capacity to foster an inclusive culture

While leaders have a personal passion for diversity and inclusion, there is an inconsistent understanding of the business benefits of diversity, or awareness of the unconscious biases that may inhibit progress. Consultation revealed the presence of cliques, friendships and microaggressions that impact individual experiences of inclusion. Experiences of gender bias, heteronormative and cultural assumptions, and microaggressions were shared, which unintentionally exclude minority groups. There are varied experiences between metro and regional offices, with metro offices having budgets for social activities while regional offices don't have the same opportunities.

Executive comments:

"I am not sure our leaders truly understand what diversity and inclusion means and why it is so important."

"We need a consistent understanding of the benefits and more inclusive language across SCA."

"Whilst I am comfortable with equality and inclusion, I don't feel equipped to know where we are headed."

Focus group comments:

"It is Ramadan – and we are having a cake day!"

"If you share an opinion that's different, then you cop it."

"There are lots of people with strong friendships, they all use nicknames. It is very cliquey"

"We don't have time to train someone who doesn't speak fluent English. Our offices aren't equipped for people with a disability."

Target attraction, development, and retention of under-represented groups

Diversity efforts are not hardwired into recruitment, promotion, or development. Internship programs for culturally diverse talent and people with disabilities have not resulted in long-term career and promotion opportunities. SCA has not focused on attracting and retaining Aboriginal and Torres Strait Islander peoples. Aside from gender, gender identity and sexual orientation, other aspects of diversity were not spoken about in consultation.

In 2022, 59% of new starters and 60% of promotions were women. But, in the same year, 61% of resignations were women. Understanding the reasons for the high attrition and continuing to take practical steps towards gender equality is critical.

Focus group comments:

"There are so few women in the meetings that I attend. You need to change how you speak and what you say to feel heard – this takes a lot more effort."

"The pool of people we have in the office is not diverse. We do not reflect the wider community."

"Australia is very culturally diverse. But this is not reflected in who we recruit."

Diversity, inclusion, equality, and belonging

Integrate diversity and inclusion into people policies and practices

SCA does not have an Accessibility Action Plan or a Reconciliation Action Plan. There are limited policies or frameworks in place to attract, retain and enable a diverse and inclusive workforce.

The application of SCA YourWay to hybrid working needs to be more consistent, and the focus on safeguarding against sexual discrimination, harassment, vilification, and victimisation needs to be maintained.

Executive comments:

"The flexibility pendulum has swung a bit far."

Focus group comments:

"People don't understand how SCA Your Way actually works."

"I love SCA Your Way. It works really well."

Actions in the second and third years of the strategy will include setting and reporting internally and externally on diversity targets beyond gender, continuing to improve gender equality, and launching programs to improve opportunities and resources for under-represented groups including Aboriginal and Torres Strait Islanders.

Our renewed commitment – three-year Diversity and Inclusion Strategy

Having reflected on the findings and recommendations of the assessment conducted by Diversity Partners, we have developed a three-year Diversity and Inclusion Strategy which was presented to SCA's Board in June 2023.

The strategy will guide our efforts over the next three years to:

- continue building a diverse and inclusive workplace for our employees where all our people can do their best work and thrive
- support a proactive and preventative approach to psychological safety risk management
- reflect the diversity of Australia's community in our consideration of programming and content
- ensure that SCA's approach to diversity and inclusion planning is best practice and responsive to current trends and workplace legislation.

Actions planned in the first year of the strategy will establish the foundations for success, including educating our leaders and involving them in diversity and inclusion initiatives, reviewing and updating policies and processes, and improving the quality of our workplace data. As we implement more substantial changes in coming years, these foundations will enable us to measure and report on our progress.

The table below summarises the actions planned for FY24, grouped under the areas in which Diversity Partners identified opportunities for improvement.

Improvement opportunity	FY24 action plans
Governance	Launch strategy Communicate diversity and inclusion calendar of events Collect workforce demographic data, and calculate inclusion score
Capability	Educate leaders on unconscious bias, psychological safety, and inclusive leadership Update induction training to emphasise diversity and inclusion commitments
Visibility	Implement tangible symbols of inclusion around the business Involve senior leaders in diversity and inclusion events Continue zero tolerance to sexual harassment and discrimination
Attract, retain, and develop	Embed inclusion in end-to-end talent acquisition, development, and retention policies and processes
Integrate	Update all workplace policies to embed diversity and inclusion Embed diversity and inclusion in corporate values and employee value proposition Ensure consistent business-wide application of SCA YourWay flexible work options Update systems to permit non-binary gender identification options

Responsible Leadership

We maintain high standards of corporate governance, lead with integrity, and abide by our strong ethical framework.

Ethical conduct, transparency, and corporate governance

At SCA, we believe we will earn trust by doing what's right and acting transparently and honestly within SCA and in our dealings with others. This goes beyond compliance with the law. These expectations are confirmed in our Code of Conduct.

SCA produces a suite of annual reporting. This Sustainability Report is how we communicate our approach and performance in relation to responsible business practice and our material topics and impacts, in line with the GRI Standards. It also provides supporting information towards meeting the guidance under Recommendation 7.4 of the ASX Corporate Governance Council's Recommendations regarding identification and management of material sustainability risks.

Speak Up

SCA's Speak Up program and Whistleblower Policy encourage and protect responsible reporting of wrongdoing including fraud, corrupt conduct, or other illegal, unethical, or other inappropriate conduct. We encourage our people to speak to their direct manager, a leadership executive, or a member of our People and Culture or Legal teams to raise concerns or suspected breaches of our Code of Conduct. Breaches of the Code of Conduct and retaliations for raising concerns are treated seriously.

Our Whistleblower Policy sets out how employees, suppliers, their workers, and other eligible whistleblowers can report misconduct and the steps SCA will take to keep the report confidential to protect the whistleblower and to investigate and resolve the report. SCA has appointed and trained workplace protection officers to handle whistleblower reports. Alternatively, reports can be made to an eligible external regulatory body or our independent whistleblower service, YourCall.

YourCall ensures disclosures can be made confidentially and anonymously at any time by telephone, email, online, or post. YourCall has experts across a variety of functions and can provide regular updates to whistleblowers through their message board portal even when the whistleblower has chosen to remain anonymous. In Australia, our whistleblowing service is accessible to people who are deaf or have a hearing or speech impairment either online or through the National Relay Service. People with difficulty speaking or understanding English can contact YourCall through the Translating and Interpreting Service on 131 450.

The Board's Audit & Risk Committee receives reports at six monthly intervals, and at other times as required, on whether there have been any material incidents reported under the Code of Conduct or the Whistleblower Policy.

See our Whistleblower Policy for further information.

Political contributions and lobbying

SCA's Code of Conduct requires Board approval for any political donations. SCA did not make any political contributions in FY23 and did not engage any political lobbyists.

Our CEO and other executives meet directly from time to time with federal, state, and local politicians. Lobbying for assistance and law reform is performed through our industry associations, CRA and Free TV. SCA is active in those associations.

Tax governance

SCA is committed to paying the right amount of tax, complying with taxation laws, and earning a "justified trust" assessment from the Australian Taxation Office. Specifically, our Taxation Risk and Governance Policy confirms our commitments:

- to file all returns and pay all taxes on time and in accordance with applicable legislation
- to make decisions based on a reasonably arguable position on all tax matters where judgement is used to make calculations and seek professional advice where appropriate
- to consider taxation implications when making significant business decisions
- not to enter artificial structures or transactions for the sole or dominant purpose of reducing its tax burden
- to maintain a professional and constructive relationship with tax authorities.

Since 2019, SCA has voluntarily published a Tax Transparency Report. Our Tax Transparency Report for FY23 discloses SCA made a net tax contribution of \$93 million. This included a total of \$20 million in income, payroll, and fringe benefit taxes with an effective income tax rate of 31.0%. As a large employer, SCA collected \$73 million of PAYG withholding tax and GST.

During FY22, the ATO completed a Combined Assurance Review of the Group, which covered the 2017 to 2020 income tax years. The Group received the highest ratings possible from the ATO, which confirmed the Group provided evidence to demonstrate that a tax control framework exists, has been designed effectively, and is operating effectively in practice. The ATO stated it had obtained a high level of assurance that the right Australian income tax outcomes were reported in the Group's income tax returns.

Leadership practices

SCA's leaders play a crucial role in embodying our values and demonstrating our organisational culture. We support leaders to play their part through training and development.

We aim to give our leaders strategies and skills to engage and motivate employees, create a constructive culture, raise performance standards, and retain high achievers. We measure our leaders' growth through Human Synergistics' Lifestyles Inventory (LSI) tool and support their development through associated coaching programs. The LSI tool uses a combination of self-assessment and feedback from colleagues to identify individual behavioural styles. Leaders who complete the LSI each year receive coaching over six months from a qualified executive coach to help them develop their personal effectiveness and leadership capability.

SCA Leads is a program for emerging leaders which aims to build leadership capability by promoting responsible, values-based leadership and helping managers create mentally safe spaces for their teams.

Responsible Leadership



Executive remuneration

The Board has adopted a Senior Executive Remuneration Framework which ensures rewards for performance, encouraging our leaders to develop and maintain a strong culture and operational discipline.

SCA's executive remuneration includes fixed and variable components. SCA operates a combined Executive Incentive Plan (EIP), which provides a simple and direct way to link executive performance and reward to generation of sustainable positive returns for shareholders.

Under the EIP, executive performance is assessed annually against a mix of financial and non-financial performance measures. Sixty percent of the annual award for SCA's Senior Leadership Team is based on performance against annual financial performance hurdles. Non-financial measures – accounting for 40% of the annual award – include execution of strategic projects designed to drive future financial performance, and cultural and behavioural influences. This balanced scorecard recognises the long-term benefits to the organisation of SCA's leaders committing to develop and maintain a strong culture and operational discipline.

The Board also maintains a corporate balanced scorecard to assess overall performance against agreed targets for radio audience survey performance, advertising market commercial share, growth in digital audio reach and monthly active users of LiSTNR, as well as financial performance measures. Several of the measures from the corporate scorecard are reflected in the scorecards of individual executives, and the Board also uses the scorecard to inform its exercise of discretion when considering the performance and incentive opportunities of individual executives.

The measures in the scorecards for executives and SCA overall are mapped to the pillars in SCA's corporate strategy and bear strong links to components of the material topics in this report. Executives are therefore rewarded for successful execution of strategy and sustainability outcomes.

The annual EIP award to each executive is settled partly in cash and the remainder in equity performance rights. The cash component is 40% for the CEO and 50% for other executives. These performance rights are eligible for vesting and conversion to ordinary shares at the end of year 3, subject to ongoing employment. Vesting of one-half of the performance rights will potentially be scaled back according to SCA's achieving satisfactory growth in earnings per share over the three years of the EIP. A further restriction on disposal of vested shares will apply until the end of year 5, two years after allocation of any vested shares, strongly aligning executives' interests with those of other shareholders.

Further information about SCA's remuneration policy and senior executives' remuneration can be found in the remuneration report within our 2023 Annual Report.

Modern slavery and human rights

In our approach to human rights, we are guided by the Universal Declaration of Human Rights (UDHR), the core conventions of the International Labour Organisation (ILO), and the UN Guiding Principles on Business and Human Rights (UNGPs).

We work to address human rights and modern slavery risks in our operations and supply chain through our Code of Conduct, Supplier Code of Conduct (Supplier Code), and other due diligence measures outlined in our annual modern slavery statements. Our Supplier Code sets out SCA's expectations and the minimum standards of behaviour required of our suppliers in the areas of ethical business practices, conflicts of interest, environmental impacts, and health and safety. It also specifically addresses labour, human rights, and modern slavery standards. The Supplier Code is publicly available on SCA's corporate website and is provided to suppliers during the contract procurement and negotiation process. Suppliers are expected to monitor compliance with the Supplier Code and report reasonable risks of a breach to SCA.

We conduct due diligence on our suppliers through a Supplier Questionnaire. We monitor responses to our Questionnaires to identify trends and emerging risks that warrant further investigation or action. During FY23, we converted our Questionnaire to a digital format for electronic completion by our major, higher-risk and new suppliers that meet certain eligibility criteria. Major and high-risk suppliers are expected to refresh their responses at appropriate intervals so we can capture and address changes to our level of risk. As our due diligence approach matures, we intend to extend the Supplier Questionnaire to major advertisers to understand their risks and processes.

We require all new employees to read and acknowledge our Modern Slavery Fact Sheet during their induction. This document sets out SCA's obligations under modern slavery legislation as well as the steps we have taken to assess and address modern slavery risks. We host these training materials on MyNet, so they are available to our employees at any time. Our annual compliance training requires employees to review these materials to maintain awareness of modern slavery risk and our procedures for identifying and managing modern slavery risks.

For more information, refer to our annual Modern Slavery Statements.

Digital Transformation and Innovation

Our audiences and advertisers expect us to serve them in a digital world.

Our audiences increasingly are choosing to enjoy our radio shows on digital devices – mobile phones, tablets, laptop and desktop computers, smart speakers, and car dashboards – and many of our listeners are choosing to listen to a catch-up podcast or watch snippets on social media of our radio shows at a time and place that suits them. The 2023 Infinite Dial Australia study found that 81% of Australians aged 12+ listen to digital radio monthly. That study also found that 43% of Australians aged 12+ listen to podcasts monthly, up from 40% in 2022 and ahead of the U.S. for the first time.

At the same time, increasing digital consumption of our content enables us to offer our advertising clients unparalleled reach and enhanced access to targeted and addressable audiences. Advertisers will pay a premium to target their messages to known digital audiences, rather than mass but unknown broadcast audiences.

We are continuing targeted investment to improve the user experience on LiSTNR and our data analytics capabilities to optimise the services we provide to listeners, media agencies, and advertisers and to support effective decision-making by SCA's content, technology, and advertising sales teams.

Personalised audience experience

Like our radio brands, LiSTNR exists in a competitive environment. Other audio apps such as Apple Podcasts, Spotify, iHeart, Amazon Music, Audible, ABC Listen, and YouTube host radio, podcasts and audio books that compete for our listeners' attention and loyalty. Many of the podcasts on LiSTNR are also available on other platforms.

We are therefore striving to provide a superior user experience on LiSTNR.

Our Triple M and Hit network radio streams, along with our other music streams, are exclusively available on LiSTNR. We retired our former Triple M and Hit apps in September 2022 and were pleased to see our dedicated fans seamlessly move to LiSTNR. Around 80% of consumption on LiSTNR is live listening to our radio stations and music streams.

We're investing in artificial intelligence and machine learning tools to provide radio listeners and other LiSTNR users with recommendations, curation, and a more personalised listening experience to help them discover and enjoy other content on LiSTNR. Keeping a listener longer on LiSTNR helps us to learn more about the content that listener enjoys and the times they like to listen which, in turn, will enable us to provide a highly personalised experience for the listener.

Digital audio advertising

LiSTNR now has more than 1.5 million signed-in users and a podcast audience network of eight million. Our podcast audience network is important because it includes consumption of LiSTNR original and partner podcasts on all podcast platforms in Australia (including, for example, Apple Podcasts, Spotify, or Amazon Music). This network maximises the reach of LiSTNR podcasts for our creators and advertisers. No matter where you hear an advertisement in a LiSTNR original or partner podcast in Australia, the advertisement will have been sold by our LiSTNR sales team.

Seb Rennie, SCA's Chief Commercial Officer, says that integration, context, the endorsement of creators and their deep relationship with their communities provide compelling evidence of podcasts' power for brands to engage in singular ways. "Audiences spend 4.5 hours a day with audio. More than screens. More than social."

Although we benefit from advertising impressions on all Australian podcast platforms, it is important over time for us to grow the on-platform audience for LiSTNR original and partner podcasts, because on-platform listening provides deeper first-party data and insights to help advertisers connect to addressable and targeted audiences at scale.

By analysing listener routines, needs and preferences, we create behavioural and interest segments – such as sport enthusiasts or news hounds – to help our advertisers connect to relevant audiences. LiSTNR also enables local location targeting to the city and post code of target markets, using internet connection and location services.

We are also able to create advertising messages in near real-time within the context of the content being consumed. For example, an advertising message could be tailored to refer to current weather conditions, sports scores, or topics being discussed in a radio program. This increasing personalisation of advertising is more likely to engage and attract the attention of listeners.

Digital Transformation and Innovation

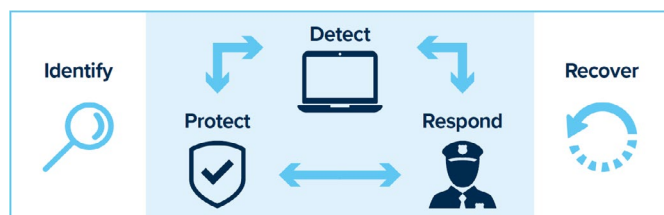
Data management, use and security

Acknowledging the importance to our business of collecting and using data about our audiences, advertisers, employees, and suppliers and their use of our systems and services, we aim to earn their trust for us to responsibly collect, manage and secure the personal information and other confidential data they share with us.

We acknowledge the very real risk of malicious data breaches, and we work hard to protect the personal information and confidential data that we hold. We have comprehensive measures to provide a secure and resilient technology environment for employees, audiences, suppliers, and other parties who engage with us. A commitment to continuous improvement is central to our approach to cyber security.

The first layer of protection is to collect and retain only the data we need for our business purposes. Controlling the volume and nature of the data we collect, and securely destroying or anonymising the data we no longer need, reduces the risk of the data being attractive to cyber hackers. We are compiling a detailed inventory of the data we hold and, where applicable, implementing lifecycle management of that data to ensure we destroy or anonymise it when it is no longer required.

We have engaged Telstra Purple to provide an outsourced Chief Information Security Officer (CISO) service. Giving us access to the collective knowledge, experience, and insights of Telstra Purple's expert team, this arrangement provides a depth of specialist resources and strengthened processes and controls to protect our systems and confidential data and help manage any breach of them. Telstra Purple reports direct to SCA's Chief Technology and Operations Officer.



We continue to measure and mature our information security management system against the internationally recognised NIST (National Institute of Standards and Technology) cybersecurity framework.

We maintain ongoing vigilance and other controls to mitigate the risks of malware, spam, and phishing attempts. This includes:

- regular penetration and breach testing and simulations
- proactive threat hunting and incident detection
- engagement of on-call expert resources to assist with response and digital forensics if a major incident occurs
- user education through friendly phishing campaigns, cyber awareness training, and course-based compliance training
- tracking mobile devices to enable remote locking of a lost or stolen device
- multifactor authentication for access to services housing high-value information.
- cyber due diligence on business partners that require access to data held by SCA or that host or manage data on SCA's behalf.

We carry out regular disaster recovery testing to ensure service and system dependencies are identified and accounted for, recovery steps are appropriate and timely, and teams understand their roles and responsibilities in the event of a disaster. At least twice each year, we perform disaster recovery testing on at least one protected service or system. We ensure all systems and services are tested on a two-year cycle to manage potential cyber risks. Any weaknesses identified in this testing are rated and promptly rectified according to their materiality.

We also periodically conduct simulations to test our crisis management plans and capability. Our most recent simulations covered a ransomware incident and a data breach incident. These simulations involve directors, senior executives, and functional specialists. They raise questions about ransom, data disclosure, continuity plans, legal action, and regulatory reporting.

We measure our maturity against the NIST framework and monitor our cyber risk profile by reference to a range of operational and governance metrics covering matters such as system availability, endpoint and email malware protection, penetration testing, patch and vulnerability management, and firewall filtering. Through continuous monitoring, we quickly identify critical or high-risk incidents which are escalated through our incident response process.

The Board's Audit & Risk Committee receives quarterly reports on SCA's cyber risk performance and reviews the outcomes of periodic penetration testing, including the closure of any vulnerabilities identified by the testing.

Connecting Communities

SCA is part of the fabric of our communities. We are Proudly National, Fiercely Local.

Local market presence and service delivery

SCA has offices in 57 locations around Australia, covering every State and Territory. We understand the importance of maintaining our local presence. Our teams stay connected to what is happening in their markets because they actively participate in their local areas and are trusted members of their communities. They understand what tone is needed in news stories, what is and isn't important for the community, and what the community should hear about. We provide local skilled jobs, support local businesses, provide local advertising opportunities, and support local events, charities, and community initiatives.

The table below shows where our 1,982 employees⁸ are located.

Employment location	No. employees
ACT	48
NSW	637
NT	5
QLD	483
SA	138
TAS	115
VIC	356
WA	200
Total	1,982



We help local businesses by expanding their reach and connecting them to customers in their community. Our range of advertising services support around 10,000 local and regional businesses to drive their presence in the market and grow their businesses.

Our 2023 Annual Report includes many examples of our activities and support for local communities over the past year.

Boomtown



National advertisers have traditionally under-invested in regional Australia. Led by SCA, since 2019 a collective of regional media businesses have partnered in a joint marketing campaign to change perceptions about regional Australia and to connect ambitious brands to the power of regional media.

Boomtown represents the 9.3 million people living in regional Australia, including major business and population centres like the Gold Coast, Newcastle, Geelong, Toowoomba, Hobart, Darwin and Canberra. Boomtown has experienced strong population growth in the past year due to the work from anywhere trend driven by the COVID-19 pandemic. The 2021 Australian Census showed the population of regional Australia had grown by 6% since 2016.

The Boomtown collective comprises eight major media stakeholders: SCA, WIN, Seven West Media, ARN, ACM, Imparja, News Corp and oOh! Media. After five years in market, Boomtown has helped raise the profile of regional media, with trade tracking studies showing awareness, consideration, usage, and effectiveness are at close to saturation levels amongst its media audience.

More information is available in SCA's 2023 Annual Report and on the Boomtown website: <https://boomtown.media/>.

⁸ These numbers summarise SCA's headcount on 30 April 2023. SCA had 1,682 FTE on that date.

Community engagement and investment



In 2016, we launched our national charity program, SCA Embrace, which works with selected national charities over two-year cycles to help their work while engaging our people to build stronger communities.

We encourage our people to use one paid day of volunteering leave each year, whether with one of our supported charities or with another charity of their choice.

Our current national charity partners are Make-A-Wish Australia and Foodbank Australia. In the 18 months we have been working with them, we have provided more than \$28 million of in-kind radio, digital and television advertising along with digital social, creative and research support, and staff volunteering. This has helped both charities to build awareness of their work, amplify their key messages, and boost their fundraising appeals.



As the pantry to the charity sector, Foodbank believes everyone should have access to good quality food. Foodbank Australia operates in every State and Territory, working with 2,625 frontline charities and 2,890 school breakfast programs to get over 87.9 million meals out to those who could use a hand every year.



Make-A-Wish creates life-changing wishes for children with critical illnesses. Its mission is to grant the wish of every eligible child – a quest sparked by the belief that a wish is integral to a child's treatment.

Testimonials from the CEOs of both our national charities appear in our 2023 Annual Report.

In July 2021, we expanded SCA Embrace to partnerships with local charities in our regional and rural locations. Since then, we've provided more than \$1.6 million of in-kind advertising to 33 different local charity organisations. Our 2023 Annual Report lists the local charities being supported by our regional offices in FY24.



Triple M continues to partner with Beyond Blue for No Talk Day. Around Australia, we stop talking for 12 hours, one day a year, to encourage men to talk about their wellbeing. It's a day of wall-to-wall music punctuated with specific, targeted messaging encouraging our listeners to take the courageous step of starting a mental health conversation either for themselves, or someone they care about.

We feature honest, lived experiences shared by global & local rockstars, including Bruce Springsteen, Dave Grohl, Amy Lee from Evanescence, Jimmy Barnes, Paul Kelly and Dave Gleeson as well as Triple M fans and listeners.

"I had a life changing conversation with a work colleague... he's still here because of what you guys did."

"Triple M is the driver to start the conversation. Hearing the family voices on Triple M having frank discussions and no BS/comedy and talking about what really is important. This makes you more than just a radio station."

Feedback from Triple M listeners on No Talk Day

In the lead-up to No Talk Day, Triple M's Shaun Gough hosted The Courageous Talk Roundtable which is available on Triple M's YouTube channel. Special guests Chelsea Frawley, daughter of AFL great Danny "Spud" Frawley who was battling depression when he died, First Nations performer Mitch Tambo, Clinical Psychologist and anxiety specialist Dr Jodie Lowinger, and SCA transgender employee Andrea Cole who has worked at Triple M for more than 35 years, talked frankly about their own experiences with mental health, sharing advice on how to best start the conversation with others.



Climate and Environment

SCA is committed to playing our part to address climate change.

Climate Change Policy

In 2023, our Board adopted a Climate Change Policy to set a foundation for steps we plan to take to build our understanding of the risks and opportunities for our business presented by climate change and to respond to those risks and opportunities.

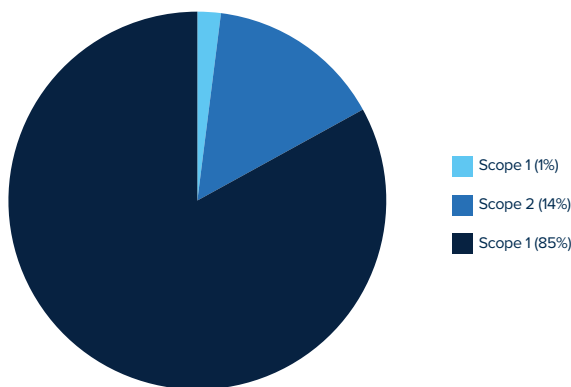
We recognise climate change is a major global issue that presents material risks and opportunities. For SCA's broadcast and digital audio, these include:

- physical risks to office, studio, broadcast, and other communications infrastructure through damage caused by more frequent and severe extreme weather events
- financial and health risks to our employees, listeners, viewers, clients, suppliers, and communities, through storms, floods, heatwaves, bushfires, and increased risk of drought
- opportunities for us and our clients and suppliers to adopt sustainability features in operations and gain revenue, cost, reputation, and value benefits.

SCA commits to addressing climate change in three ways.

- We will understand the impacts, risks, and opportunities that climate change poses for our business.
- We will develop strategies to reduce our net carbon emissions over time.
- We will use our platforms to support our audiences, clients, suppliers, and communities to make sustainable changes, reducing their net carbon emissions.

GHG emissions inventory



In March this year, with help from Point Advisory, we completed a GHG emissions inventory for SCA's business. We now have a model for recording and measuring our GHG emissions for FY23 and future years.

SCA's GHG emissions inventory for FY23 and an explanation of the basis of presentation of the inventory are presented in Appendix B.

Eighty-five percent of SCA's total GHG emissions of 27,997 tCO₂e in FY23 are in Scope 3.

Reduction pathways

We have worked with our consultants, Point Advisory, to consider opportunities for reducing our GHG emissions that would support setting targets and measuring our progress. We conducted workshops to identify a long list of opportunities and then ranked opportunities according to their achievability and alignment with our strategic goals. We then created a short list of opportunities that are financially viable, technically mature, aligned with SCA's strategy, and will result in material reductions in emissions. We will explore these opportunities in the year ahead.

Scope	Emission source	Reduction opportunity
1	Offices/buildings	Eliminate stationary fuel consumption.
1	Vehicles (owned)	Reduction and potential electrification of SCA owned and leased fleet vehicles.
2	Offices/buildings	Reduction of electricity use in offices. Prioritise Green Star ratings for new leases.
2	Offices/buildings	Install on-site renewable energy generation where feasible.
2	Offices/buildings	Purchase of renewable energy/PPAs.
3	Purchased goods and services	Competitive tenders to select low emissions contractors, supplier engagement and partnerships.
3	Waste	Increase diversion of recycling to landfill.
3	Business travel	Review travel requirements to ensure only necessary travel takes place.
3	Upstream leased assets (BAI Communications)	Support BAI Communications to achieve their emissions reduction targets

As noted above, SCA's Scope 3 emissions are dominated by electricity consumption at upstream leased assets, which are broadcast transmission sites under the operational control of third parties. These emissions account for 39% of SCA's total GHG emissions, and 46% of Scope 3 emissions. We expect this emissions source to decarbonise in line with the ongoing decarbonisation of Australia's electricity grid and BAI Communications' specific initiatives. There are also opportunities for SCA, as a significant client, to engage with BAI Communications to support and increase their climate ambition and to explore other ways to reduce SCA's specific electricity requirements at their sites.

BAI Communications has made a public commitment to achieve net zero emissions by 2040. Its Towards Carbon Neutral program focuses on the replacement of aging assets (including FM radio transmitters) with energy-efficient options and supplementation with green energy at selected BAI owned and operated sites.

Source: <https://www.baicomunications.com/about-us/giving-back/sustainability/>

Climate and Environment

Environmental compliance and management

There were no environmental compliance breaches during FY23. Through the centralisation of regional services hosted in local data centres to our core primary data centres in Sydney and Melbourne, we are actively reducing our data centre footprint and power consumption. This initiative is also supported by improvements in data centre hardware density, better power efficiency of hardware and virtualisation.

Supporting disaster response and recovery

In disasters and emergencies, radio is a lifeline. When the community needs us, we are there with 24-hour coverage, even when we are affected ourselves.

During emergencies and disasters, our employees work around the clock to broadcast information to local communities. We recognise the effort and strength it takes to deliver emergency information to your community, friends, neighbours, and family. We support employees through our Employee Assistance Program, flexible working policy and additional days of leave including volunteer leave.

We have established QR codes in each of our offices that link to our state emergency response plans and the crisis management plan, regional content plan, and TV emergency response plan to ensure our people can readily access emergency plans. We provide training on our emergency plan and business continuity processes to general managers and content directors.

When disaster strikes, we are there with regular updates and news bulletins. We switch to 24-hour emergency information broadcasts across impacted communities to ensure people have access to the information they need to stay safe.

Our offices and studios are also impacted by weather events and disasters. SCA can get our services on the air in the event of a crisis using our fly away kits to continue our broadcasts via satellite, reducing our reliance on terrestrial transmission lines which may be down or unreliable. Through BAI Communications, we can set up temporary transmission sites to ensure we maintain coverage across impacted areas while keeping our people safe.

We are also able to supply broadcasts from different SCA offices. When Port Macquarie experienced some of the worst flooding seen in the area in over 50 years - stranding residents and damaging infrastructure - we were able to continue to provide residents of Port Macquarie with news and updates broadcast from our Wagga Wagga studios.

To strengthen our emergency processes, we have established protocols with state emergency services to manage escalations and contacts to ensure emergency services have a clear line of communication within SCA. This ensures, when disaster strikes, we can readily contact emergency services to provide timely accurate updates across our markets.

Governance and accountability

Good governance is key to the success of our sustainability ambitions.

Sustainability governance

Our Corporate Governance Statement describes our key corporate governance practices and policies, including information about our directors. Information about our leadership executives is available on SCA's corporate website and in our 2023 Annual Report.

The Board has three standing Committees: the Audit & Risk Committee, the People & Culture Committee, and the Digital Transformation Committee. The responsibilities of each Committee are set out in a Charter approved by the Board. Our Corporate Governance Statement and 2023 Annual Report provide further information about the composition, responsibilities, and activities of the Board's Committees.

SCA's executive team, the Board, and its Committees consider sustainability risks and opportunities within their respective areas of responsibility.

The table below summarises how principal responsibility for the six sustainability themes in this report lie within SCA's Senior Leadership Team. The individual KPIs of these executives or their direct reports can be mapped to these themes.

Process for raising concerns

As explained under Ethical conduct, transparency, and corporate governance, SCA's Speak Up program and Whistleblower Policy provide mechanisms for employees, suppliers, their workers, and other eligible whistleblowers to report wrongdoing connected to SCA or its governance practices including fraud, corrupt conduct, or other illegal, unethical, or inappropriate conduct.

Theme	Senior Leadership Team	Board and Committees
Trusted Content	Chief Content Officer	Board
Thriving People	Chief People and Culture Officer	People & Culture Committee Audit & Risk Committee
Responsible Leadership	Chief Executive Officer Chief Financial Officer Chief Technology and Operations Officer Chief People and Culture Officer	Board People & Culture Committee
Digital Transformation	Chief Technology and Operations Officer Chief Content Officer Chief Marketing Officer Chief Commercial Officer	Board Digital Transformation Committee Audit & Risk Committee (cyber security)
Connecting Communities	Chief Content Officer Chief Technology and Operations Officer Chief Commercial Officer	Board
Climate and Environment	Chief Technology and Operations Officer Chief Financial Officer	Audit & Risk Committee

Appendix A: Glossary and references

A.1. Glossary

The following terms are used in this report.

Term	Meaning
ACMA	Australian Communications and Media Authority
APRA AMCOS	Australasian Performing Right Association Limited (APRA) and Australasian Mechanical Copyright Owners Society (AMCOS)
BAI	BAI Communications
Board	SCA's Board of directors
BSA	Broadcasting Services Act 1992
CISO	Chief Information Security Officer
CRA	Commercial Radio and Audio
CRA Code	Commercial Radio Code of Conduct
EAP	Employee Assistance Provider, Drake WorkWise
EEIO	Environmentally extended input-output
Free TV	Free TV Australia
Free TV Code	Free TV Code of Practice
GRI	Global Reporting Index
Metro	Brisbane, Sydney, Melbourne, Adelaide, and Perth
MyNet	SCA employee intranet
NGER scheme	National Greenhouse and Energy Reporting scheme
NIST	National Institute of Standards and Technology
PPCA	Phonographic Performance Company of Australia
Regional	Radio and television markets other than Metro markets
SCA	Southern Cross Media Group Limited and its controlled entities
WHS	Work health and safety

A.2. References

The following policies and other documents referred to in this report or relevant to the topics covered in this report are available on the Investors pages on SCA's corporate website, www.southerncrossaustereo.com.au.

- Company Constitution
- 2023 Annual Report
- 2023 Tax Transparency Report
- 2023 Modern Slavery Statement
- 2023 Corporate Governance Statement
- 2023 Workplace Gender Equality Agency Report
- Board Charter
- Board Committee Charters
- Climate Change Policy
- Code of Conduct
- Diversity Policy
- External Communications Policy
- News Editorial Policy
- Non-executive Director Share Ownership Policy
- Risk Management Framework (including Risk Appetite Statement)
- Risk Management Policy
- Securities Trading Policy
- Senior Executive Evaluation Policy
- Senior Executive Remuneration Framework
- Senior Executive Share Ownership Policy
- Taxation Risk and Governance Policy
- Whistleblowing Policy
- Workplace Health and Safety Policy.

Other policies and procedures referred to in this report are internal to SCA and are available to SCA's employees on our employee intranet, MyNet.

Appendix B: GHG emissions inventory

B.1. Standards used

SCA's organisational boundary and inventory was set based on the Greenhouse Gas Protocol and GHG Protocol Scope 3 Standard, which is recognised internationally as the main carbon accounting standard. Other Standards and frameworks are used as required, including use of the National Greenhouse Accounts Factors for Australia-specific emissions factors.

B.2. Organisational boundary

SCA's organisational boundary has been set in three stages.

- The organisational boundary ensures a business captures all business activities and facilities, including all subsidiaries and business units. Under the GHG Protocol, SCA has operational control of a business activity or facility if SCA has full authority to introduce and implement operating policies for the activity or facility. SCA's organisational boundary includes the operations of all wholly owned subsidiaries (as listed in Appendix C.3). This includes services such as broadcast transmission and television playout provided by SCA to joint ventures in which SCA has an interest but for which SCA does not have full authority to introduce and implement operating policies.
- Activities and facilities over which SCA has operational control give rise to Scope 1 and 2 emissions.
- Activities and facilities not under SCA's operational control are then assessed for relevance in the Scope 3 boundary, using the Relevance Test. Relevant emissions sources are then included as Scope 3 emissions. Scope 3 activities are mapped into 15 categories in the GHG Protocol Scope 3 Standard.

Operational boundaries

The emission sources included in SCA's inventory were identified by applying the methodology in the GHG Protocol.

Scope 1 – Direct GHG emissions

Scope 1 comprises GHG emissions from sources owned or controlled by SCA. Principally, these emissions are associated with fuel used (petrol and diesel) in vehicles owned or leased by SCA and natural gas used for space heating at SCA's Bendigo premises.

Scope 2 – Indirect electricity GHG emissions

Scope 2 comprises emissions from purchased electricity consumed by SCA and therefore brought into our organisational boundary. It includes electricity purchased by SCA from the grid for consumption at corporate offices and studios.

Scope 3 – Other indirect GHG emissions

Scope 3 emissions are a consequence of SCA's activities but occur from sources not owned or controlled by SCA. The Corporate Value Chain (Scope 3) Accounting and Reporting Standard (a supplement to the GHG Protocol) categorises Scope 3 emissions into 15. SCA considers that Scope 3 emissions sources are relevant when two or more of the following conditions are met:

- they are large relative to SCA's Scope 1 and Scope 2 emissions
- SCA can influence reduction of Scope 3 emissions from that source
- they contribute to SCA's GHG risk exposure
- they are considered critical by key stakeholders
- they are an outsourced activity that previously contributed significantly to SCA's scope 1 or Scope 2 emissions, or are an activity that comparable organisations typically perform with their own staff and facilities
- they are reported by most industry peers or are referred to in sector

guidance or standards.

The tables above set out which of the 15 Scope 3 emissions sources are included within SCA's organisational boundary and which have been excluded.

Key decisions reflected in these tables include:

Inclusion of emissions associated with:

- broadcast transmission sites previously owned or rented by SCA and now owned and operated by SCA's outsourced broadcast transmission services provider, BAI Communications
- listening to or watching SCA's audio and television products

Exclusion of emissions associated with:

- creation of third party content communicated by SCA (principally television programming supplied by Australian television networks and podcasts supplied by Australian and international publishers)
- marketing production, voice overs, and contract talent services because these service providers most often work in SCA offices or studios with SCA staff so that emissions associated with their services are included in Scope 1 and 2 emissions
- joint venture companies in which SCA has an interest, although emissions associated with services such as broadcast transmission and television playout provided by SCA to joint venture companies are included.

Included

1. Purchased goods and services:
 - office furniture, general goods - events and promotions
 - purchased services
2. Capital goods: Embodied emissions in computers/electronics, machinery
3. Fuel - and energy-related activities: Extraction, production, and transportation of fuels; transmission and distribution losses in electricity use
5. Waste generated in operations: Disposal and treatment of commercial and industrial (C&I) waste generated in operations; wastewater handling; municipal water supply
6. Business travel: Accommodation, flights, taxi and ride sharing, rental cars
7. Employee commuting and WFH: Trips to and from work by employees
8. Upstream leased assets: Direct emissions from operation of assets leased by, and not under the operational control of SCA
11. Use of sold products: Emissions from broadcasting goods/services by SCA (Radio, TV, podcasts)

Excluded

- Applicable but not relevant:
- 10 & 12. Processing and disposal of sold products -Third party content for radio, TV, podcasts which are broadcast by SCA
 15. Investments: Joint Ventures
- Not applicable (source does not exist for SCA):
- 4 & 9. Upstream & downstream transportation and distribution: Emissions associated with the transportation of products purchased/sold by SCA, in vehicles not owned by SCA
 13. Downstream leased assets: Facilities owned by SCA, and leased to third parties
 14. Franchises

Appendix B: GHG emissions inventory

B.4. Data and methodology

B.4.1. Emissions reporting factors

Data was collected from business units and external suppliers and was analysed by SCA's finance team using a spreadsheet model developed with support from our independent environment consultant, Point Advisory. Where actual emissions data is not available from SCA's supply chain, this model facilitates emissions calculations using applicable emissions reporting factors including the following:

Emissions source	Emissions cost factor / EEIO
Electricity	
Stationary fuels	Australian National Greenhouse
Transport fuels	Accounts Factors
Waste	
Water	Australian National Life Cycle Inventory Database
Courier, postage, or freight	Victorian EPA
Events	Victorian EPA, Net Zero Compass
ICT services	Net Zero Compass (ERM)
Hotels	UK Department for Environment, Food & Rural Affairs (DEFRA) factors for accommodation (and others according to location of hotel)
Travel	Victorian EPA, and UK DBEIS / DEFRA for overseas travel
Professional services	Net Zero Compass (ERM), UK DEFRA
Office equipment and stationery	Net Zero Compass (ERM)
Capital expenditure	Net Zero Compass (ERM)
Working from home	UK DBEIS / DEFRA

B.4.2. Data quality

We have assessed the quality of activity data used to calculate our emissions and have identified opportunities for improvement in future years. Better quality data will improve the accuracy of reporting our GHG emissions over time and more readily demonstrate reductions in those emissions over time.

We will achieve better quality data by progressively moving from reliance on use of EEIO factors, assumptions, and modelling to actual data for Scope 3 emissions. We will prioritise actions to obtain better quality data for emissions sources according to the materiality of the associated emissions.

The emissions estimate for software services (the second highest Scope 3 emissions source) is based on financial spend, multiplied by an EEIO factor. This technique is useful for understanding the order of magnitude of an emissions source but carries a relatively high level of uncertainty. The same approach of seeking supplier-specific data also applies to other significant categories of spend-based emissions calculations such as marketing, IT services, and broadcast equipment.

The highest priority areas for improving data quality are are purchased electricity (Scope 2), purchased goods, services and upstream leased assets. (Scope 3 and principally relating to outsourced broadcast transmission and television playout services). As more suppliers undertake their own GHG emissions inventories, we expect them to be able to provide reports stating their individual customers' share of their Scope 1 and 2 emissions (which would then become part of SCA's Scope 3 emissions).

B.4.3. External assurance

We have not sought assurance of our GHG emissions reporting in this report. However, we are conscious of ensuring our model is suitable for independent assurance in future including to comply with the requirements of IFRS S2 Climate-related Disclosures issued in June 2023 by the International Sustainability Standards Board. We understand we will likely need to comply with that new standard from 2025.

Appendix B: GHG emissions inventory

B.4.4. FY23 GHG emissions inventory

The tables below provide SCA's GHG emissions inventory for FY23.

Split by Emissions Source

			FY23
Scope	GHG Protocol Categories	Source	GHG emissions tCO2-e
Scope 1	Transport fuel consumption	Petrol	91
		Diesel	338
	Stationary fuel consumption	Natural Gas	1
Scope 2	Purchased Electricity	Electricity	3,857
Scope 3	Purchased goods and services	Purchased Goods	251
		Professional Services	3,657
	Capital Goods	Capital Goods	4,618
		Transport fuel scope 3	106
	Fuel and energy related activities	Stationary fuel scope 3	0
		Electricity Scope 3	483
	Water & Waste	Water	241
		Waste	2,439
	Business Travel	Flights	487
		Taxi & Hire cars	23
		Accommodation	116
	Employee commuting & WFH	Employee commute	30
		WFH	2
	Upstream leased assets	Leased computers and printers	110
		Transmission electricity usage	10,866
		Distribution electricity usage	60
	Use of sold products	Radio	48
		TV	-
		Podcasts	173
TOTAL			27,997

Appendix B: GHG emissions inventory

Split by Emissions Scope

FY23

Emissions by Scope	GHG emissions tCO ₂ -e	% Total Operational Emissions
Scope 1	429	2%
Scope 2	3,857	14%
Scope 3	23,710	85%

Split by Asset type⁹

FY23

Emissions by Asset Type	Tonnes CO ₂ -e	% Total Asset Emissions
Offices/studios	7,693	41%
Transmission sites	10,926	59%

Split by Office control¹⁰

FY23

Emissions by Office control	Tonnes CO ₂ -e	% Total Office Emissions
Leased Offices	3,726	86%
Owned Offices	614	14%

Split by Vehicles

FY23

Emissions by Vehicles	Tonnes CO ₂ -e	% Total Operational Emissions
Petrol Vehicles	114	0%
Diesel Vehicles	421	2%

⁹ Offices/studios were defined as electricity, natural gas for heating, procured goods, professional services, water and waste that would be included in the day to day running of an office space

¹⁰ SCA rents houses for some employees in remote areas where affordable housing is hard to find. The employee is responsible for utility and other costs associated with these properties. These properties were excluded from calculations because they were outside SCA's operational control.

Appendix C: GRI Content Index

C.1. GRI Index

GRI standard Number	Disclosure	SCA FY23 response and remarks
2-1	Organisational details	2023 Annual Report.
2-2	Entities included in the organisation's sustainability reporting	See Appendix C.3 in this report.
2-3	Reporting period, frequency, and contact point	Unless stated otherwise, this report covers FY23, running from 1 July 2022 to 30 June 2023. Please contact CompanySecretary@sca.com.au.
2-4	Restatements of information	No restatements
2-5	External assurance	No external assurance was undertaken on this report. SCA will consider assurance on key topics in future reports.
2-6	Activities, value chain and other business relationships	2023 Annual Report
2-7	Employees	

Permanent employees, and a breakdown by gender and by region:

Row Labels	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Grand Total
Female	14	277	3	203	59	49	167	87	859
Male	33	244	2	140	44	35	148	79	725
Grand Total	47	521	5	343	103	84	315	166	1584

Temporary employees, and a breakdown by gender and by region:

Row Labels	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Grand Total
Female	0	13	0	8	3	3	4	4	35
Male	0	12	0	6	3	2	2	5	30
Grand Total	0	25	0	14	6	5	6	9	65

Full-time employees, and a breakdown by gender and by region:

Row Labels	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Grand Total
Female	0	47	0	58	8	8	11	13	145
Male	1	44	0	68	21	18	24	12	188
Grand Total	1	91	0	126	29	26	35	25	333

Appendix C: GRI Content Index

Non-guaranteed hours employees, and a breakdown by gender and by region:

Row Labels	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Grand Total
Female	13	262	3	175	48	43	147	70	761
Male	33	254	2	143	46	36	148	81	743
Grand Total	46	516	5	318	94	79	295	151	1504

Part-time employees, and a breakdown by gender and by region:

Row Labels	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Grand Total
Female	1	28	0	36	14	9	24	21	133
Male	0	2	0	3	1	1	2	3	12
Grand Total	1	30	0	39	15	10	26	24	145

Methodology: Data is based on employees who were active on 30 April 2023.

Contextual information: Regions are based on the state or territory where the employee works. A non-guaranteed hours employee is classified as Casual in the SCA data. A full-time employee is any employee working 37.5 hours a week. A part-time employee is any employee who is not casual and works fewer than 37.5 hours a week. A temporary employee is an employee on a contract with an end date.

GRI standard Number	Disclosure	SCA FY23 response and remarks
2-8	Workers who are not employees	<p>(a) There are approximately 150 non-employees whose work is controlled by SCA.</p> <p>"(i) The most common type of non-employee worker is an independent contractor engaged under an agreement between SCA and the contractor stating the requirements and duration of the services and the payment terms. "</p> <p>(ii) The most common type of work is the production of audio content for radio or podcasts.</p> <p>"(b) The methodology used to compile the data regarding non-employees is to report the full-time equivalent number of non-employees using an average of remuneration across the reporting period. There were no significant fluctuations in the number of non-employees to employees during the reporting period, not between reporting periods. "</p>
2-9	Governance structure and composition	<p>2023 Annual Report.</p> <p>Corporate Governance Statement.</p>
2-10	Nomination and selection of the highest governance body	<p>Corporate Governance Statement.</p> <p>Board Charter.</p>
2-11	Chair of the highest governance body	<p>2023 Annual Report.</p>

Appendix C: GRI Content Index

GRI standard Number	Disclosure	SCA FY23 response and remarks
2-12	<i>Role of the highest governance body in overseeing the management of impacts</i>	Corporate Governance Statement. Board Charter.
2-13	<i>Delegation of responsibility for managing impacts</i>	Corporate Governance Statement. Board Charter.
2-14	<i>Role of the highest governance body in sustainability reporting</i>	SCA's Board oversees sustainability reporting and endorsed the results of the materiality assessment. For further information, see Materiality Assessment in this report.
2-15	<i>Conflicts of interest</i>	Code of Conduct.
2-16	<i>Communication of critical concerns</i>	Corporate Governance Statement. Board Charter. We do not report on individual concerns.
2-17	<i>Collective knowledge of the highest governance body</i>	Corporate Governance Statement.
2-18	<i>Evaluation of the performance of the highest governance body</i>	Board Charter.
2-19	<i>Remuneration policies</i>	Senior Executive Remuneration Framework. Remuneration Report included in the 2023 Annual Report.
2-20	<i>Process to determine remuneration</i>	Senior Executive Remuneration Framework. Senior Executive Share Ownership Policy. People & Culture Committee Charter. Collective bargaining: During FY23, 83% of SCA employees were covered by an industry award. A further 2% of our employees were covered by the Southern Cross Broadcasting (Southern NSW) Collective Agreement 2006 – 2009, and the remaining 15% are non-award.
2-21	<i>Annual total compensation ratio</i>	(a) In FY23, the annual total compensation for the organisation's highest paid individual was \$1,547,949. The median annual total compensation for all employees (excluding the highest paid) was \$110,568. The ratio of the highest paid to the median was 14. (b) In FY23, the percentage increase in the annual total compensation for the organisation's highest paid individual was less than 1%. The median percentage increase in annual total compensation for all employees (excluding the highest paid) was 3%. The ratio of the percentage increase of the highest paid individual to the median percentage increase was 33%. (c) Total compensation includes salary, commissions, bonuses, allowances, and superannuation contributions. The data is compiled from payroll records.
2-22	<i>Statement on sustainable development strategy</i>	See the CEO Message in this report.

Appendix C: GRI Content Index

GRI standard Number	Disclosure	SCA FY23 response and remarks
2-23	Policy commitments	<p>Code of Conduct.</p> <p>Climate Change Policy.</p> <p>Work Health and Safety Policy.</p> <p>Supplier Code of Conduct.</p> <p>Modern Slavery Statement.</p>
2-24	Embedding policy commitments	<p>SCA's Board has approved the Code of Conduct and Whistleblower Policy and receives regular reports on whether there have been breaches of the Code of Conduct, disclosures under the Whistleblower Policy, concerns raised under SCA's Speak Up program for workplace grievances, and workplace health and safety risks, hazards, and incidents.</p>
2-25	Processes to remediate negative impacts	<p>SCA demonstrates its commitment to remediate any negative impacts through the robust policies and structures we have in place to create a safe working environment for all employees and contractors. Our policies provide a clear framework around appropriate and inappropriate behaviours within the business to protect the health and safety of our employees and ensure SCA adheres to all relevant employment laws and best practice.</p> <p>Policies include our Code of Conduct, Whistleblower Policy, Grievance Policy, Bullying and Harassment policies, Workplace Health and Safety policies, Equal Employment Opportunity, Modern Slavery fact sheet.</p> <p>SCA's values (People are our Power, Be Genuine, Always Curious, We Push Doors Open, and We're better Together) also demonstrate our commitment in holding our employees accountable to displaying constructive behaviours and ways of working.</p> <p>SCA conducts compulsory annual compliance training for all employees to remind them of our policies and provide an update on changes.</p> <p>We have many avenues available to identify grievances including our Speak Up program and Whistleblower Policy, as well as informal conversations between managers and their team members.</p> <p>Refer to the following policies:</p> <p>Grievance Policy</p> <p>Bullying Policy</p> <p>Harassment Policy</p> <p>Whistleblower Policy</p> <p>Speak Up program.</p> <p>The Whistleblower Policy includes a facility for employees and others to make whistleblower disclosures confidentially and anonymously through an independent third party, YourCall.</p> <p>Since February 2022, we have conducted periodic PulseCheck surveys to capture employee sentiment and identify trends and correlate results with business changes. PulseCheck is designed to send a positive message to employees that their opinions are valued, and this includes reporting to employees on feedback from each survey and the initiatives to be implemented in response.</p> <p>SCA also reports every six months to the Board's People & Culture Committee on grievances raised by employees and how these grievances have been addressed. An internal grievance tracker is maintained for the purposes of this reporting and to enable trends to be tracked and addressed. The People and Culture team also seeks feedback from parties to a grievance to continually assess the effectiveness of our grievance procedures.</p>

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GRI standard Number	Disclosure	SCA FY23 response and remarks
2-26	<i>Mechanisms for seeking advice and raising concerns</i>	SCA encourages employees to raise concerns regarding their wellbeing with management or the People and Culture team. Any concerns, whether raised formally or informally, are taken seriously, and addressed in a timely manner in line with our grievances policy. SCA's Whistleblower Policy and Speak Up program encourage, protect, and support responsible reporting of wrongdoing including fraud, corrupt conduct, or other illegal, unethical, or other inappropriate conduct. This program encourages employees to bring any suspected wrongdoing to the attention of management or the People and Culture team as a first step. If someone does not feel comfortable reporting internally then an employee can make a confidential and anonymous report to an independent third-party service, YourCall.
2-27	<i>Compliance with laws and regulations</i>	In FY23, SCA complied with all applicable laws and regulations and did not incur any fines or non-monetary penalties for non-compliance with any law or regulation.
2-28	<i>Membership associations</i>	<ul style="list-style-type: none"> a. Commercial Radio and Audio (CRA): SCA is a member and represented on the Board by Chief Executive Officer John Kelly and Head of Legal and Corporate Affairs Tony Hudson. b. Free TV Australia: SCA is a member and represented on the Board by its Head of Legal and Corporate Affairs Tony Hudson. c. Australian Association of National Advertisers: SCA is a member. d. Boomtown: SCA is a founding member of this regional media initiative to promote benefits of national advertising investment in regional Australia.

Appendix C: GRI Content Index

GRI standard Number	Disclosure	SCA FY23 response and remarks
2-29	<i>Approach to stakeholder engagement</i>	<p>SCA maintains strong relationships with a range of external stakeholders. The purpose of engagement for each stakeholder group is described below.</p> <ul style="list-style-type: none"> a. Major shareholders: Ensure they understand SCA's strategy and operations and are confident in SCA's governance, including Board composition and non-executive and executive remuneration structures. b. Proxy/governance advisers: As above. c. Australian Communications and Media Authority (ACMA): Provide confidence SCA is aware of and complies with applicable regulatory obligations as a radio and television broadcaster. d. Federal government: As above, and to lobby for appropriate regulatory reform. e. State and local governments: Provide confidence SCA is aware of and complies with applicable regulatory obligations and contributes positively to its local communities. f. Listeners: Provide content that entertains, informs, and inspires them, and platform features that attract them to listen to SCA content on SCA platforms. g. Media buyers: Provide confidence in the value of investing their or their clients' advertising dollars on SCA's platforms so that SCA obtains a high proportion of the available investment. h. Sporting organisations (AFL, NRL, Cricket Australia): Secure appropriate rights to communicate audio commentary of scheduled matches. i. Charity partners: Contribute value to enable partners to communicate their messages, raise funds, and provide their services effectively. j. In regional areas (local business, sporting, and community organisations): Demonstrate SCA's commitment to positive economic, social, and cultural outcomes in our local communities. <p>Engagement methods vary according to the stakeholder group and context. Methods include investor presentations, publication of reports, listener and client surveys, and electronic and face to face communications. Stakeholder concerns are routinely considered in development of policies, strategies, content, and platform and product features.</p>
2-30	<i>Collective bargaining agreements</i>	<p>Eighty-three percent of employees are covered by industry awards. Two percent covered by Southern Cross Broadcasting (Southern NSW) Collective Agreement 2006 – 2009.</p> <p>The remaining 15% are non-award.</p>

401-1 New Employee hires and employee turnover

New Hires

Row Labels	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Grand Total
Female		66	2	29	15	9	30	13	164
<25		11		5	3	3	7	2	31
25 - <35		41	2	14	7	3	13	3	83
35 - <45		7		7	2	3	3	6	28
45 - <55		6		3	3		6		18
55 - <65		1					1	2	4
Male	6	50		20	6	11	27	13	133
<25	3	4		1	1	3	2		14
25 - <35	2	34		14	1	3	18	9	81
35 - <45	1	6		3	2	3	5	1	21
45 - <55		6			2	1	1	2	12
55 - <65				2		1	1	1	5
Grand Total	6	116	2	49	21	20	57	26	297

Turnover (permanent employees only)

Row Labels	ACT	NSW	NT	QLD	SA	TAS	VIC	WA	Grand Total
Female	6	81		56	8	13	51	32	247
<25		3		2	1	1		3	10
25 - <35	4	49		22	2	9	32	12	130
35 - <45	1	20		18	3	3	9	13	67
45 - <55	1	6		11			8	2	28
55 - <65		3		2	1		2	2	10
>65				1	1				2
Male	7	49	2	36	17	12	25	19	167
<25		1		1	2	1	3	1	9
25 - <35	6	18		18	6	8	9	8	73
35 - <45		18	1	7	4		10	4	44
45 - <55	1	9		5	2	1	3	5	26
55 - <65		2	1	3	2	2		1	11
>65		1		2	1				4
Grand Total	13	130	2	92	25	25	76	51	414

Appendix C: GRI Content Index

GRI standard Number	Disclosure	SCA FY23 response and remarks
401-2	<i>Benefits provided to full-time employees that are not provided to temporary or part-time employees</i>	<p>All permanent full-time and part-time SCA employees are entitled to the same benefits. Some benefits are calculated on a pro-rata basis (e.g., parental leave entitlements and annual leave) and therefore vary between full-time and part-time employees. Casuals and contractors do not have access to all the benefits offered to permanent employees.</p> <p>See Thriving People in this report.</p>
401-3	<i>Parental leave</i>	<p>a. Total number of employees that were entitled to parental leave, by gender.</p> <p>F - 695 M - 592</p> <p>b. Total number of employees that took parental leave, by gender.</p> <p>F - 38 M - 1</p> <p>c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.</p> <p>F - 37 M - 1</p> <p>d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.</p> <p>Data not available.</p> <p>Return to work and retention rates of employees that took parental leave, by gender.</p> <p>F – Return to work rate: 97.4%; Retention rate: Data not available M – Return to work rate: 100%; Data not available</p>
403-1	<i>Occupational health and safety management system</i>	See Thriving People in this report.
403-2	<i>Hazard identification, risk assessment, and incident investigation</i>	See Thriving People in this report.
403-3	<i>Occupational health services</i>	<p>See Thriving People in this report.</p> <p>In addition to the policies and practices described in Thriving People, the following policies reinforce our commitment to protect our staff from dangerous work conditions and support our staff in managing these situations if they ever arise:</p> <p>Asbestos Management Policy</p> <p>Hazardous Chemicals Policy</p> <p>High Risk Work Licensing Policy</p> <p>Transmitter Site Safety Policy</p> <p>Working Alone Policy</p> <p>Working At Heights Policy</p> <p>Working With Compressed Gas and Portable Gas Appliances Policy</p> <p>Bushfire Preparation and Awareness Guidelines</p> <p>Outside Broadcast Safety Checklist</p> <p>Safe Driving Policy</p> <p>Safe Handling and Transport of Compressed Gases</p>

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GRI standard Number	Disclosure	SCA FY23 response and remarks
403-4	<i>Worker participation, consultation, and communication on occupational health and safety</i>	See Thriving People in this report.
403-5	<i>Worker training on occupational health and safety</i>	See Thriving People in this report.
403-6	<i>Promotion of worker health</i>	<p>See Thriving People in this report.</p> <p>Benefits for SCA salaried employees include:</p> <p>Annual leave</p> <p>Birthday leave</p> <p>Volunteering leave</p> <p>Paid parental leave</p> <p>Bupa Corporate Health Insurance Program (discounted private health insurance)</p> <p>Mazda Corporate Program (inclusion of three years' free servicing upon purchase)</p> <p>SCA YourWay flexible work program</p> <p>SCA YourWellbeing portal on MyNet</p> <p>SCA YourFamily paid parental leave program</p> <p>Employee Referral Program</p> <p>SCA Mentoring Program.</p> <p>We support employees to maintain good mental health through the following policies and programs:</p> <p>Annual training for managers on managing mental health in the workplace, using the Suicide Risk Intervention Framework published by the Centre for Corporate Health as a guide to proactively identifying and managing high-risk mental health impacts</p> <p>Employee assistance program (EAP) and counselling services available 24/7 for our employees</p> <p>A wellbeing portal on the company intranet</p> <p>Partnering with Beyond Blue to provide talks about mental health to our people</p> <p>Access to financial management advice and counselling</p> <p>Ongoing partnership with Dr Travis Kemp, Organisational Psychologist, with a specific focus on supporting our on-air talent and the unique challenges they face in their role</p> <p>Distressed caller training to support our front of house staff and producers navigate challenging and distressing listener calls</p> <p>Bespoke training for our news leaders delivered by the Dart Centre for Trauma and Journalism, equipping leaders with practical skills and knowledge to support trauma exposed staff.</p>

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GRI standard Number	Disclosure	SCA FY23 response and remarks
403-7	<i>Prevention and mitigation of occupational health and safety impacts directly linked by business relationships</i>	<p>Contractors performing work at SCA locations must complete a safety induction in SINE, to mitigate their health and safety risks when working in SCA locations. Every contractor must also read the site hazards statement on entering SCA premises and confirm they have done so in SINE.</p> <p>Regular contractors must complete an online contractor induction via SINE. The online company contractor induction includes verification of workers compensation and public liability insurance and applicable licence requirements (e.g., electrical, or responsible service of alcohol), and provision of applicable safe work method statements and electrical safety certificates. We also require regular contractors to read and acknowledge our WHS Policy, Bullying Policy, Drug and Alcohol Policy and Smoking Policy, as well as the site hazard statement. Once this process is complete, the documentation is approved by the engineer in charge of the site and records are kept in SINE.</p>
403-8	<i>Workers covered by an occupational health and safety management system</i>	<p>Quarterly reporting on Risk Assessments (MyNet)</p> <p>Vehicle checklists (manual filled in and loaded onto Intranet)</p> <p>Incidents/No Injury, Incidents/Injury and Hazards and the type of incident/Hazard e.g.: Building or Threatening behaviours etc. (in the Incident and Hazard reporting section on MyNet)</p> <p>All manually reviewed, compiled, and reported on each quarter for the National Operational Risk Committee Meeting</p>
403-9	<i>Work-related injuries</i>	<p>(a) For employees:</p> <p>(i) The number and rate of fatalities because of work-related injury: Nil</p> <p>(ii) The number and rate of high-consequence work-related injuries (excluding fatalities): 5; LTIFR 1.55</p> <p>(iii) The number and rate of recordable work-related injuries: 23 injuries</p> <p>(iv) The main types of work-related injury: Psychosocial</p> <p>(v) The number of hours worked: 3,209,433</p> <p>(b) For workers who are not employees but whose work or workplace is controlled by SCA:</p> <p>vi. The number and rate of fatalities because of work-related injury: Nil</p> <p>vii. The number and rate of high-consequence work-related injuries (excluding fatalities): Nil</p> <p>viii. The number and rate of recordable work-related injuries: Nil</p> <p>ix. The main types of work-related injury: N/a</p> <p>x. The number of hours worked: Not recorded.</p> <p>(c) The work-related hazards that pose a risk of high-consequence injury: SCA conducts a range of stunts and promotional activities involving on-air radio announcers, employees, contractors, guests, and prize winners, some of which involve risk of injury. All such activities are conducted according to established checklists and policies or otherwise pursuant to a specific risk assessment which identifies relevant hazards and risks and the mitigating actions taken to manage those hazards and risks. During FY23, none of these activities led to a high-consequence injury.</p> <p>Illnesses and injuries are tracked together.</p> <p>Rates have been calculated based per 1,000,000 hours worked.</p> <p>Data was tracked using our quarterly Board reporting derived from our running Claims and Injuries (inc. Illnesses) Tracker, which is updated upon receiving each incident report.</p>

Appendix C: GRI Content Index

GRI standard Number	Disclosure	SCA FY23 response and remarks				
403-10	Work-related ill health	i. The number of fatalities because of work-related ill health: Nil. ii. The number of cases of recordable work-related ill health: 5. iii. The main types of work-related ill health: Psychosocial.				
405-1	Diversity of governance bodies and employees	Percentage of employees per employee category in each of the following diversity categories: i. Gender: F – 52% M – 48%. ii. Age group:				
		Age	Female	Male	Total	Total % ¹
		25 - <35	412	340	752	38%
		35 - <45	307	271	578	29%
		45 - <55	146	150	296	15%
		55 - <65	50	96	146	7%
		>65	10	16	26	1%
		Total	1,039	943	1,982	100%
		¹ . Totals do not include ¹⁰ employees who do not identify as male or female.				
405-2	Ratio of basic salary and remuneration of women to men.	a. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation. Full Time: Not calculated Part Time: Not calculated b. The definition used for 'significant locations of operation'. Significant location is the SCA Metro areas (Brisbane, Sydney, Melbourne, Adelaide, Perth)				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	i. Complaints received from outside parties and substantiated by the organization: Nil complaints. ii. Complaints from regulatory bodies: Nil complaints. iii. Total number of identified leaks, thefts, or losses of customer data: Nil.				

Appendix C: GRI Content Index

C.3. Entities considered in this report

C.3.1 Entities under SCA's operational control

Name	Australian Company Number	Name	Australian Company Number
ACN 159 751 443 Pty Ltd	159 751 443	Greater Cairns Radio Pty. Limited	008 631 730
Austereo Capital Fm Pty Ltd	074 733 841	Harbour View Radio Pty Limited	108 208 000
Austereo Entertainment Pty Ltd	067 790 345	Mackay Transmission Facility Pty Ltd	086 725 966
Austereo ESP Finance Pty Ltd	095 343 294	Maryborough Broadcasting Company Pty Limited	009 661 527
Austereo Group Pty Ltd	095 552 060	Mid-Coast Broadcasters Pty. Limited	003 566 309
Austereo International Pty Ltd	066 861 489	Mid-Districts Radio Pty Ltd	008 806 166
Austereo Online Pty Ltd	073 667 197	National Radio Sales Australia Pty Ltd	082 351 282
Australian Capital Television Pty. Limited	008 404 706	Nessan Pty Ltd	003 012 253
Australian Regional Broadcasters Pty Ltd	080 900 670	North Queensland Broadcasting Corporation Pty Ltd	010 110 497
Barrier Reef Broadcasting Proprietary Limited	010 998 384	North West Broadcasters Pty. Ltd.	010 553 152
Bassfarr Pty. Limited	085 051 761	North West Radio Pty Ltd	074 344 451
Belcap Investments Pty Ltd	009 265 187	Northern Rivers Television Pty Ltd	062 851 629
Broken Hill Television Pty Limited	000 450 724	Perth FM Radio Pty Ltd	077 569 110
Burl Rose Pty. Ltd.	056 039 591	Radio 2GZ Pty Limited	003 490 015
Central Coast No. 2 Pty Ltd	101 229 949	Radio 2LF Pty Limited	061 719 453
Central Coast Radio Pty Ltd	069 299 225	Radio 2RG Pty Limited	003 803 218
Clainew Pty. Limited	085 051 645	Radio 3BO Pty Limited	008 631 758
Commercial Radio Coffs Harbour Pty Ltd	001 758 407	Radio 3CV Pty Limited	061 299 581
Consolidated Broadcasting System (W.A.) Pty Limited	008 670 460	Radio 3MA Pty Limited	052 266 814
Dubbo Fm Radio Pty Ltd	086 880 873	Radio 6AM Pty. Ltd.	009 214 733
Elldale Pty Ltd	009 355 248	Radio Albury Wodonga Pty. Limited	008 631 687
Esperance Broadcasters Pty Ltd	008 716 283	Radio Newcastle Pty Ltd	000 225 525
FNQ Broadcasters Cairns Pty Limited	081 117 473	Radio West Broadcasters Pty Ltd	009 316 554
FNQ Broadcasters Townsville Pty Limited	081 117 455	Redwave Media Pty Ltd	083 553 860
Forsby Pty. Ltd.	009 662 668	Regional Broadcasters Australia Pty Limited	059 084 552
Geraldton Fm Pty Ltd	009 269 327	Regional Media No. 1 Pty Limited	124 719 400
Gold Coast F.M. Pty. Ltd.	057 872 723	Regional Media No. 2 Pty Limited	124 720 289
Gold Radio Service Pty. Limited	009 661 518	Regional Radio Broadcasters Pty Limited	094 315 474
Goulburn And Border Broadcasters Pty Limited	082 950 105	Regional Radio No. 2 Pty Ltd	003 882 326
Goulburn Valley Border Venture Pty Limited	082 950 249	Regional Television Pty Limited	067 044 464
Great Northern Broadcasters Pty Ltd	008 670 291	River View Radio Pty Limited	108 209 043
Great Southern Land Broadcasters Pty Ltd	092 410 305	Riverina Broadcasters (Holdings) Pty. Ltd.	008 440 364

Appendix C: GRI Content Index

C.3. Entities considered in this report

C.3.1 Entities under SCA's operational control

Name	Australian Company Number
Rockhampton Broadcasting Co. Pty. Limited	009 661 634
Rockhampton Transmission Facility Pty Ltd	101 064 797
SCA Digital Pty Ltd	007 914 641
SCMG Investments Pty Ltd	159 977 349
Sea FM Central Coast Pty Limited	003 644 353
Sea FM Gold Coast Pty Limited	076 340 826
South Eastern Broadcasters Pty Limited	054 328 415
Southern Cross Austereo Pty Ltd	109 243 110
Southern Cross Austereo Services Pty Ltd	158 877 484
Southern Cross Austereo Treasury Pty Ltd	006 243 474
Southern Cross Broadcasting (Australia) Pty Limited	006 186 974
Southern Cross Communications Pty Limited	004 386 038
Southern Cross Incentive Pty. Limited	006 780 061
Southern Cross Media Australia Holdings Pty Limited	110 357 036
Southern Cross Media Group Limited	116 024 536
Southern Cross Media No. 2 Pty Limited	115 944 842
Southern Cross Media No.1 Pty Limited	134 746 124
Southern Cross Media Services Pty Limited	010 711 056
Southern Cross National Network Pty Ltd	148 894 231
Southern Cross Network (Production) Pty. Ltd.	009 540 149
Southern Cross Sales Pty Ltd	000 762 630
Southern Cross Telecommunications Pty Ltd.	089 636 724
Southern Cross Television (TNT9) Pty. Limited	009 483 587
Spencer Gulf Telecasters Pty Limited	007 658 782
Spirit Radio Network Pty Ltd	094 880 538
Tablelands Broadcasting Pty Limited	076 812 523
The Radio.Com.Au Pty Ltd	090 688 421
Third National Network Australia Pty Limited	095 062 285
Today FM Brisbane Pty Ltd	095 320 415
Today FM Sydney Pty Ltd	095 323 201
Today Radio Network Pty Ltd	095 317 927

Name	Australian Company Number
Town and Coastal Broadcasters Australia Pty Limited	094 315 483
Townsville Broadcasters Pty. Limited	008 631 678
Triple M Adelaide Pty Ltd	060 560 198
Triple M Brisbane Pty Ltd	095 320 424
Triple M Melbourne Pty Ltd	095 319 903
Triple M Network Pty Ltd	095 317 936
Triple M Sydney Pty Ltd	095 323 185
Veneta Pty Ltd	000 644 584
Video Central Pty Ltd	076 670 892
Votrant No. 620 Pty Ltd	050 051 477
Votrant No. 691 Pty Limited	055 750 082
VRB Pty Ltd	064 740 030
West Australian Radio Network Pty Ltd	009 429 485
Whitsundays Broadcasters Pty Limited	082 761 055

C.3.2 Joint ventures for which SCA provides broadcast transmission and television playout services

These entities are not included in SCA's organisational boundary because SCA does not have full authority to introduce and implement operating policies for these entities. However, SCA's provision to these entities of broadcast transmission and television playout services are included in SCA's organisational boundary. SCA holds a 50% equity interest in these entities.

Name	Australian Company Number
Central Digital Television Pty Ltd	137 856 930
Darwin Digital Television Pty Ltd	119 023 782
Eastern Australia Satellite Broadcasters Pty Ltd	142 743 557
Tasmanian Digital Television Pty Ltd	096 334 253