

SCA

Code of Conduct

Message from our CEO Grant Blackley

Southern Cross Austereo (SCA) is one of Australia's leading media companies reaching more than 95% of the Australian population through its radio, television and digital assets. Under the Triple M and Hit network brands, SCA owns 85 analogue radio stations across metropolitan and regional Australia plus an additional 10 digital radio brands in Australia's capital cities. SCA provides national sales representation for a further 34 regional radio stations. SCA broadcasts 92 free to air TV signals across regional Australia with Nine Network programming and advertising representation across Australia's East Coast, Seven Network programming in Tasmania and Darwin, and Seven, Nine and Ten programming in Spencer Gulf. SCA operates Australia's leading premium podcasting network - PodcastOne Australia – and provides Australian sales representation for global open audio platform SoundCloud. SCA's premium brands are supported by social media, live events, video, online and mobile assets that deliver national and local entertainment and news content

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

Our Code of Conduct applies to all those who work for, act on behalf of or represent Southern Cross Austereo. The purpose is to ensure an open, vibrant and progressive environment where everyone can give their best.

The Code reflects many of the policies and practices that are already in place or that may be implemented in the future. Our policies which go into more detail should be read by all employees and can be located on [MyNet or are available through our People and Culture Team](#).

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

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

Yours Sincerely



Chief Executive Officer

Code of Conduct

<p>Values</p>	<p>At SCA we pride ourselves on creating a culture where people feel valued and can perform at their very best. We don't focus simply on what we do – we also care about how we do it.</p> <p>We have five values:</p> <p>Collaboration: We work as a team together; we deliver our best.</p> <p>Courage: We always show strength and spirit.</p> <p>Initiative: Each of us is responsible for exceeding expectations.</p> <p>Creativity: We lead with fresh thinking. We create winning ideas.</p> <p>Integrity: We do what's right and act with transparency and honesty.</p> <p>Our people share these values and bring them to life every day. Our values represent what we cherish and aspire to. They guide our day-to-day decisions and shape our individual and collective behaviour in our dealings with each other and with others, including clients, consumers, business partners, suppliers and government authorities.</p>
<p>Our People</p>	<p>Equal Opportunity</p> <p>Our people should always be treated fairly with dignity and respect. SCA values a diverse workforce where all people have equal access opportunities to opportunities. Our People are responsible for promoting equal opportunity in the workplace.</p> <p>Health, Safety and Welfare</p> <p>We are committed to ensuring the health, safety and welfare at work for all employees and visitors. We will always strive to comply with applicable laws and regulations relating to the workplace and ensure the protection of our people, and visitors. Everyone who works at SCA is responsible for their own safety and the safety of others. We must consider anyone who may be affected by our actions and behaviours.</p> <p>Drugs and Alcohol</p> <p>Our people must not use, distribute or possess illegal drugs at work and should carry out their duties free from the influence of alcohol.</p> <p>Discrimination, Harassment and Bullying</p> <p>We are committed to an environment free from harassment and bullying whether that be physical, verbal or online.</p> <p>Reporting Offensive Behaviour</p> <p>All reports of inappropriate or offensive behaviour will be treated seriously and investigated.</p>

<p>Confidential Information</p>	<p>Everyone who works at SCA has a responsibility for protecting the company's confidential information both during and after employment. Confidential information includes but is not limited to client details, financial, budgeting, technology, passwords, personal details, competition details, commercial, operational and strategic plans.</p>
<p>Company Property</p>	<p>Our people should not engage in theft, fraud or misuse of SCA's property or the personal property of other colleagues.</p> <p>SCA provides facilities and resources to help our people perform at their very best these include: supplies, equipment, documents, petty cash, corporate credit cards, cab charges, prizes, mobile phones, laptops, iPads, computers, printers, submitting false timesheets, or expense claims.</p> <p>These facilities and resources are for work purposes only.</p>
<p>Conflict of Interest</p>	<p>Our people should actively avoid any conflict between their personal interests and those of SCA. Any potential conflict of interest should be declared to your manager or the People and Culture Team</p> <p>Examples of conflict of interest could include:</p> <ul style="list-style-type: none"> • Negotiating a contract with a supplier owned or managed by a close friend or relative; • Carrying out work of a similar nature for a competitor; • Having a personal or financial interest in a business that has dealings with SCA; • Obtaining financial gain or advantage from a business transaction made in the course of duty; • Influencing an employee's promotion or recruitment in circumstances where the two people have a close relationship. <p>We should not use any internal information gained in the course of our work to our own advantage or to that of a friend or relative.</p>
<p>Intellectual Property</p>	<p>We value our intellectual property and proper management of these assets is critical to our success.</p> <p>All documents, materials, records, video and audio acquired or created in the course of employment is the property of SCA. Our people may only remove originals or copies of such property from our offices or send to other emails addresses for the sole purpose of performing their work duties and must return such information on request.</p>
<p>Privacy and Data Protection</p>	<p>We must all comply with applicable privacy and data protection laws and regulations and respect the privacy of our clients, listeners, audiences, contractors, and colleagues. Usage of SCA systems, email and internet facilities may be monitored to ensure lawful and best practice.</p>
<p>Technology Acceptable Use</p>	<p>Everyone is responsible for using our technology properly and in accordance with the Technology Acceptable Use Policy.</p>

	<p>When travelling with SCA equipment or information care should be taken to prevent damage, loss or theft.</p> <p>Our systems are intended for business use. However, we are permitted to use them for non-business purposes, but care should be taken to ensure use does not interfere with our obligations to SCA or infringe on anyone's intellectual property rights. We must all exercise care when writing emails, documents or social media that may damage SCA's, our clients' or your reputation.</p>
Social Media	<p>Social Media platforms such as Facebook, Twitter, Google and Instagram have become critical business tools, particularly for our business. A broad range of employees in various roles represent our brands and company by posting and engaging with our audience on behalf of their station brands, shows and our clients.</p> <p>All interactions on social media are public. In the eyes of the law (and the media) there is no difference between a Facebook post and a live break on-air. Anything published on social media needs to adhere to the same rules and guidelines we follow when broadcasting content via our TV and radio stations. Please bear in mind that comments by third parties on our social media posts are also our responsibility and should be moderated in accordance with the same rules and guidelines.</p>
Television and Radio Codes and Standards	<p>It is essential for our business and a condition of our employment that everyone who creates, broadcasts and/or publishes Content undertakes training provided. If anyone is unsure regarding their obligations under these codes, they should speak to their Manager, Content Director, Legal or the People and Culture Team.</p>
Competitions and Trade Promotions	<p>Immediate family members are automatically ineligible to enter any of our competitions or trade promotions.</p> <p>Please check with a member of the Legal team if you are unsure about the terms regarding competitions or promotions.</p>
Financial Accounting and Approvals	<p>All financial information should be recorded and presented accurately. If you are unsure about getting any expense approved, please contact a member of the Finance team.</p>
Ethical Business Practices and Gifts	<p>SCA is committed to a sound culture of corporate compliance and ethical behaviour and has zero tolerance for wilful breaches of this Code of Conduct (including fraud and corruption). Acknowledging the risks to SCA's reputation as well as the serious criminal and civil penalties that may be incurred if SCA or our people are involved in fraud or corruption, SCA is committed to:</p> <ul style="list-style-type: none"> • not paying bribes to any individual, government official, organisation or entity • not paying bribes indirectly through brokers, agents, consultants or other associated persons or third parties • avoiding the appearance of paying bribes through other means such as improper meals and entertaining, excessive gift giving or making facilitation payments

	<ul style="list-style-type: none"> • not providing support to political parties, except with the approval of the CEO and in line with public guidelines • maintaining detailed and accurate books and records and internal controls and ensuring bribes or other improper payments are not concealed by “off-book” arrangements or by falsifying books and records • performing regular fraud, bribery, corruption and modern slavery risk assessments • maintaining a register of reportable gifts and benefits received • recording potential and actual conflicts of interest • ensuring reports of suspected fraud, bribery or corrupt conduct are reported and investigated thoroughly, impartially and in a timely manner • providing fraud, bribery, corruption and modern slavery awareness training as required for our people. <p>Customary or reasonable gifts, hospitality, meals of modest value in the normal course of business are acceptable. Gifts of cash must never be made or accepted.</p> <p>Prior approval must be sought from the CEO, CFO or COO for:</p> <ul style="list-style-type: none"> • Any gift with a value in excess of \$500.00 • Any hospitality in excess of \$500.00 <p>Our people and their family members should not give or accept any gift, entertainment, sponsorship, charitable donation or other benefit which might be intended or perceived as an attempt to improperly influence the business relationship between SCA and another party doing business with us.</p> <p>If there is any doubt about what to do, advice should be sought from your direct manager, CFO or COO.</p>
<p>Corporate Social Responsibility</p>	<p>We acknowledge our responsibilities towards the community and the environment and in particular our shareholders, employees, listeners, viewers, clients as well as government and regulatory agencies.</p> <p>We are committed to managing the way in which we operate and continue to improve our corporate responsibility policies and performance.</p>
<p>Official Requests for Information</p>	<p>Colleagues who are contacted by regulators or authorities or any lawyers representing third parties requesting company information or documents should immediately notify SCA's General Counsel.</p>
<p>Contacts with the Media</p>	<p>Our Chief Marketing and Communications Officer and Corporate Communications Manager handle all external communications concerning SCA. No statement should be made, or an opinion expressed to the press or other media or a third party without their supervision.</p>