

CODE OF CONDUCT

SCA

A MESSAGE FROM OUR CEO: JOHN KELLY

We are one of Australia's leading media companies covering the biggest and most diverse media and content offering of any media company in the country. We are the home of LiSTNR and the Hit and Triple M networks. We own 104 radio stations across FM, AM and DAB+ under the Triple M and Hit Network brands and provide national representation for 56 regional radio stations, with more than 9 million listeners across the Hit and Triple M networks nationally. The LiSTNR digital audio app offers Australia's most compelling digital audio content which includes our FM AM & DAB+ stations, live AFL, NRL and international cricket coverage, over 50 music playlists, local news and over 800 podcast titles from leading Australian and global creators. With more than 2.3 million signed in users, the LiSTNR digital audio sales network reaches an estimated 8 million people each month. We have leading online and social communities nationally and produce more live content than any other broadcast business across both metro and regional communities.

Our success depends on the highest standards of professionalism, and how we conduct ourselves in all our dealings both internally and externally is paramount. This Code reflects many of the policies and practices that are already in place or that may be implemented in the future. The SCA policies that go into more detail should be read by all employees and can be located on the intranet or are available through the People and Culture Team. We truly value the importance of this code - it forms part of your employment agreement with SCA. Rest assured that any potential breaches will be thoroughly looked into, and appropriate actions may be taken. It's crucial that we all work together to uphold these standards.

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



John Kelly

PURPOSE

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

SCOPE

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

GUIDING VALUES

Our core values underpin all that we do.

Our Guiding Values



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.



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.



We learn something new every day. We take creative risks and have fun. We constantly seek a better way forward. We learn from our mistakes.



We push open doors to unlock new opportunities. We drive outcomes – and achieve what we set out to. We identify both problems and solutions. We are proactive not reactive. We guide our own career journeys.



We collaborate, because collaboration gets us the best outcomes. We include multiple perspectives in project groups. We actively seek feedback from others and take it on board – it helps us grow. Our leaders value ideas from everyone.

RESPONSIBILITIES

- Be accountable and responsible for your actions.
- Be aware of, and comply with, this Code of Conduct.
- Model our Values.
- Perform your defined duties to the best of your ability.
- Report behaviour that may be contrary to this Code of Conduct and required standards of behaviour.
- Keep all records, documents and communications accurate, truthful and up to date.
- Inform yourself and comply with all SCA policies and procedures relevant to your position.
- Refer to the policy and procedure on the following page for specific responsibilities in relation to this Code.

POLICY & PROCEDURE

This Code of Conduct outlines the required standards of acceptable conduct and behaviour that we expect of all SCA People in the performance of your duties and interactions at work no matter where you are performing your duties.

This required standard of acceptable conduct and behaviour supports our ability to maintain public trust and confidence in the integrity and professionalism of the services we provide to the community.

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

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

BUSINESS ETHICS & VALUES

We should always be honest, fair and truthful in all our dealings - both internal and external. That includes dealings with stakeholders such as colleagues, clients, consumers, business partners, suppliers and government authorities.

Our Values are the standards which people across SCA share. They represent the things we cherish and aspire to. They guide our day-to-day decisions and shape our individual and collective behaviour.

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

OUR PEOPLE

Equal Opportunity

Our people should always be treated fairly with dignity and respect. We value a diverse workforce where all people are treated with respect and fairness and have equal access to opportunities. Our people are responsible for promoting equal opportunity in the workplace.

Health, Safety & Welfare

We are committed to ensuring the health, safety and welfare at work for all employees and visitors. We will always strive to ensure we comply fully with all applicable and relevant laws and regulations relating to the workplace and ensure the protection of our people, clients and members of the general public. We have a dedicated Work Health and Safety Management system that guides us in meeting these requirements.

Everyone who works at SCA is responsible for their own safety and the safety of others. We must consider anyone who may be affected by our actions and behaviours.

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

OUR PEOPLE

Drugs & Alcohol

Our people must not use, distribute or possess illegal drugs at work and should carry out their duties free from the influence of illegal drugs or alcohol.

Discrimination, harassment and bullying-free workplace

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

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

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

Dress

Our people should adhere to business casual attire whilst in the office and during external client meetings/events. Business casual attire also extends to working from home, specifically when attending internal and external video conferences.

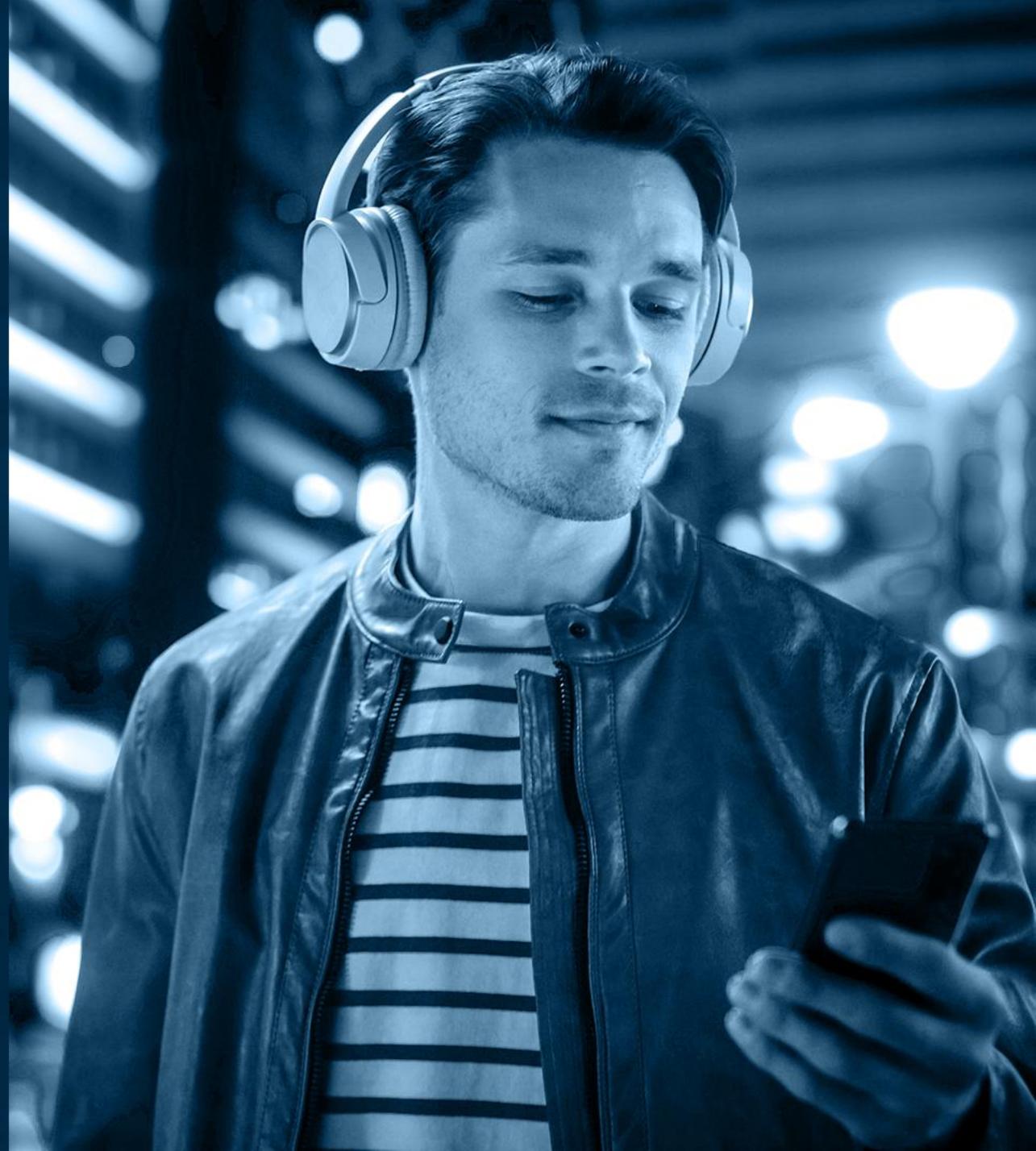
No dress code can cover all contingencies so employees must exercise judgement in their choice of clothing to wear to work. If you experience uncertainty about acceptable business casual attire for work, please ask your manager or HR Business partner.

SECONDARY EMPLOYMENT

SCA people may be permitted to engage in outside employment, provided that this employment does not have a detrimental impact on your ability to meet the requirements of your role, adversely affect your work performance or give rise to a business conflict or potential conflict of interest.

Before engaging in secondary employment, our people should first discuss this with their manager or a member of the People & Culture team.

Employees and performers must seek written permission to engage in any additional work outside of SCA.



CONFLICT OF INTEREST

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

Examples of conflicts of interest could be:-

- 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; or
- Using internal information gained in the course of our work to our own advantage or to that of a friend or relative.

Employees and performers must seek written permission to engage in any additional work outside of SCA.

SCA's assets cannot be used to sponsor other ventures without written permission.

Any relationship that may lead to a conflict of interest including with external clients/stakeholders must be disclosed to your direct manager and/or a member of the People & Culture team.

COMPANY PROPERTY

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

Misuse of company property includes but is not limited to supplies, equipment, documents, petty cash, corporate credit cards, cab charges, prizes, mobile phones, laptops, iPads, computers, printers, submitting false timesheets or expense claims.

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

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

INTELLECTUAL PROPERTY

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

You must not use personal or business information about SCA or any information you have access to through your work for any personal gain or gain for others such as friends, relatives or business associates.

All documents, materials, records, video and audio acquired or created in the course of employment is the property of SCA.

Our people may only remove originals or copies of such property from our offices or send to other email addresses for the sole purpose of performing their work duties and must return such information on request.

PRIVACY & DATA COLLECTION

We must all comply with the applicable privacy and data protection laws and regulations and respect the privacy of our clients, listeners, audiences, contractors and colleagues.

Usage of company systems, email and internet facilities may be monitored to ensure lawful and best practice.

CONFIDENTIAL INFORMATION

Everyone who works at SCA has a responsibility to protect the company's confidential information - both during and after employment. Confidential information includes but is not limited to client details, financial, budgeting, technology, passwords, personal details, competition details, commercial, operational and strategic plans.

TECHNOLOGY ACCEPTABLE USE

Everyone is responsible for using our technology properly and in accordance with the Technology Acceptable Use Policy. When travelling with SCA equipment or information, care should be taken to prevent damage, loss or theft.

Our systems are intended for business use. You are permitted to use them for non-business purposes, but care should be taken to ensure use does not interfere with your 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.

SCA

SOCIAL MEDIA

Social Media platforms such as Facebook, X, YouTube, Instagram and Tik Tok have become critical business tools, particularly for a media business like SCA. A broad range of employees in various roles represent our brands and company by posting and engaging with our audience on behalf of their station brands, shows, podcasts and our clients. All interactions on social media are public. In the eyes of the law (and the media) there is no difference between a social media post and a live break on-air. Anything published on social media needs to adhere to the same rules and guidelines we follow when communicating via LiSTNR or our 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.

RADIO CODES & STANDARDS

It is essential for our business and a condition of your employment with SCA that everyone who creates, broadcasts and /or publishes content undertakes training provided by SCA.

If anyone is unsure regarding their obligations under these codes, they should speak to their manager, content director, Legal or a member of the People & Culture team.

COMPETITIONS & TRADE PROMOTIONS

SCA staff and immediate family members are automatically ineligible to enter any of our competitions or trade promotions.

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

FINANCIAL ACCOUNTING & APPROVALS

All financial information should be recorded and presented accurately.

If you are unsure about getting any expense approved, please contact a member of the Finance team.

DECLARING GIFTS, BENEFITS OR BRIBES

Our People and their family members should not give or accept any gift, entertainment, sponsorship, charitable donation or other benefit which might be intended or perceived as an attempt to improperly influence the business relationship between SCA and another party doing business with us.

Customary or reasonable gifts, hospitality, meals of modest value in the normal course of business are acceptable. Gifts of cash must never be made or accepted.

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

- Any gift with a value in excess of \$500; or
- Any hospitality in excess of \$500.

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

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

CORPORATE SOCIAL RESPONSIBILITY

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

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

OFFICIAL REQUESTS FOR INFORMATION

Colleagues who are contacted by regulators or authorities or any lawyers representing third parties requesting company information or documents should immediately notify SCA's Chief Legal Officer.

CONTACT WITH MEDIA

All external media communications concerning SCA is handled by our communications agency – Sound Story headed by Communication Director Jane Elliott.

No statement should be made or an opinion expressed to the press or other media/third party without the supervision of SCA's communications agency – Sound Story.

Reporting Breaches of this Code of Conduct

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

- Your direct manager;
- Another manager in the organisation that you trust;
- Any member of the People & Culture team; or
- SCA's Chief Legal Officer.

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

Failure to Comply with this Code of Conduct or any Breach of SCA Policies

SCA People are expected to comply with this Code of conduct and all SCA policies and procedures. These should be read by all employees and can be located on the intranet or are available through Human Resources.

SCA People may be subject to disciplinary action, up to and including termination of employment or contract, where it is established that you have breached this Code of Conduct or any of SCA's policies and procedures, including SCA's Workplace Bullying & Harassment Policies.

Authority and Resources

This policy has been authorised by the Board of Directors.

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

SCA policies and procedures can be located on the intranet.

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