



Code of Conduct

Purpose

The Code of Conduct outlines the required standard of acceptable conduct and behaviour expected of all team members, 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 the company, including our directors, employees and contractors across all divisions and brands of Southern Cross Media Group Limited (ASX:SXL).

Core Values

- Work together
- Do what you say
- Put your heart into it
- Make it happen

Policy & Procedure

This Code of Conduct is supported by, and must be read in conjunction with, other Company frameworks, policies and procedures, including the Leadership Capability Framework, the Content Ethics Framework and other applicable workplace policies and procedures. All team members are expected to be familiar with, and comply with, the policies, procedures and frameworks relevant to their role and responsibilities.

This Code of Conduct sets out the mandatory standards of conduct and behaviour that apply to all people in the performance of their duties and workplace interactions, regardless of location. These standards support the Company's governance obligations and the maintenance of public trust and confidence in its operations.

The Code of Conduct establishes the minimum behavioural and ethical requirements that govern conduct across the organisation and defines expectations for interactions with colleagues, external professionals, clients, visitors and other stakeholders. Compliance with this Code is required to ensure a professional, respectful and accountable workplace.

This Code is not intended to provide an exhaustive statement of requirements for every aspect of work. Rather, it operates as a policy framework that guides conduct and behaviour and must be read in conjunction with relevant Company policies, procedures and frameworks.

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 company policies and procedures relevant to your position.
- Refer to the policy and procedures on the following page for specific responsibilities in relation to this Code.

Business Ethics & Values

We must 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 our people share. They represent the things we cherish and aspire to. They guide our day-to-day decisions and shape our individual and collective behaviour.

Team members must not act beyond their authority or misuse their position or make any representations about any matter on behalf of the company.

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.

Presentation

Team members are required to dress appropriately for their role at all times. Where a role involves interaction with, or presentation to, the public or external parties, team members must ensure their appearance, dress and conduct meet professional standards and do not bring the Company into disrepute.

Business-appropriate attire is required when working in the office, attending external meetings or events, and when working from home where work activities involve external engagement or representation of the Company.

This standard cannot address every circumstance. Team members are expected to exercise professional judgement in their choice of attire. Where there is uncertainty, guidance must be sought from the relevant manager or HR Business Partner.

Our People

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 public. We have a dedicated work health and safety management system that guides us in meeting these requirements.

Everyone who works at the company is responsible for complying with all WHS requirements including ensuring their own safety and the safety of others and must become familiar with the processes and requirements in regard to reporting issues, incidents and grievances. We must consider anyone who may be affected by our actions and behaviours and strive to ensure an environment free of hostility. Team members must comply with all applicable laws during inter-state or overseas travel for work. The laws of a foreign state or country will be enforceable.

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

Equal opportunity

Our people must 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.

Drugs & alcohol

It is illegal for our people to use, distribute or possess illegal drugs at work. Staff must carry out their duties free from the influence of illegal drugs or alcohol.

Discrimination, harassment & 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.

Secondary Employment

If a Team member wishes to engage in secondary employment outside of the company, express written approval must be obtained from your manager or the People & Culture team prior to commencing any outside employment.

This must not have a detrimental impact on the 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.

Conflict Of Interest

Our people must avoid any actual or perceived conflict between their personal interests and those of the Company. Any actual or potential conflict of interest must be disclosed promptly to the team member's manager or People & Culture Team.

Conflicts of interest may include, but are not limited to, personal or financial interests in businesses dealing with the Company, secondary employment or engagements, personal relationships that may influence workplace decisions, misuse of Company information or assets, or obtaining personal benefit through Company business activities.

Written approval is required before undertaking any additional work outside the Company. Any relationship or circumstance that may give rise to a conflict of interest, including with external clients or stakeholders, must be disclosed to the team member's direct manager and/or the People & Culture team.

Receiving of Gifts

Our people and their immediate family members must not give or accept any gift, hospitality or other benefit that could reasonably be perceived as improperly influencing a business relationship. Only customary business gifts or hospitality of modest value are permitted. Cash or cash-equivalent gifts must never be given or accepted.

Prior approval from the relevant General Manager is required for any gift or hospitality exceeding \$500. All approved items must be declared for recording in the Company's gift register. Where there is doubt, advice must be sought before offering or accepting any benefit.

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. Refer to the company's privacy policies for further details.

Company Property

Theft, fraud, or misuse of Company property or the personal property of colleagues is a criminal offence.

Company property must be used for legitimate business purposes only. This includes, but is not limited to, equipment, devices, documents, cash, credit cards, expenses, time records and Company systems. Submitting false timesheets or expense claims, or using Company resources for personal gain or improper purposes, is prohibited. Team members are responsible for the proper care and use of all Company property, equipment and uniforms issued to them.

Intellectual Property

The Company's intellectual property and confidential information are critical business assets and must be protected at all times.

Company information, including personal, commercial or business information accessed through work, must not be used for personal benefit or the benefit of others. All documents, materials, records, and audio-visual content created or obtained in the course of employment remain the property of the Company.

Such information may only be removed from Company premises or shared externally where required for legitimate work purposes and must be returned or deleted upon request.

Confidential Information

Everyone who works at SCMG Ltd (ASX:SXL) 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 equipment or information, care must 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 must be taken to ensure use does not interfere with your obligations to the company or infringe on anyone's intellectual property rights. Monitoring may occur to ensure lawful practice; you must familiarise yourself on the policies in this area.

We must all exercise care when writing emails, documents or social media that may damage the company, our clients or your reputation.

Social Media

Social Media platforms are critical business tools for the company; however, they are not intended for work-related use by most team members, therefore team members must not post, comment, or engage on behalf of the Company unless this activity is an expressly authorised part of their role and approved in accordance with the social media policy and relevant delegated authority.

All social media interactions are public. In the eyes of the law and the media, there is no distinction between a social media post and live-to-air content. Any authorised social media activity must therefore comply with the same rules, standards and guidelines that apply to all Company communications.

The company is also responsible for third-party comments on its social media platforms, which must be moderated in accordance with these same requirements.

Radio & Television Codes & Standards

It is essential for our business and a condition of your employment with SCMG Ltd (ASX:SXL) that everyone who creates, broadcasts and /or publishes content, undertakes the relevant training provided in relation to compliance.

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

Competition & Trade Promotions

All 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.

Official Requests For Information

Colleagues who are contacted by regulators or authorities or any lawyers representing third parties requesting company information or documents must immediately notify the company's general counsel.

Financial Accounting & Approvals

All financial information must be recorded and presented accurately. If you are unsure about getting any expense approved, please contact a member of the Finance team.

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

Contact With Media

All external media communications concerning the company is handled by our communications agency through our corporate affairs department. No statement must be made or an opinion expressed either oral or written in relation to any persons associated with the company to the press or other media/third party without the supervision of the company's corporate affairs representative

Failure To Comply With This Code Or Breach Of Company Policy

Team members must comply with this Code of Conduct and all Company policies and procedures, which are available on the intranet or through Human Resources. Breaches of this Code or any Company policy may result in disciplinary action, up to and including termination of employment or contract.

Reporting Breaches Of This Code Of Conduct

All employees must report suspected or known breaches of this Code of Conduct or other company 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 General Counsel. The company 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.

Authority & Resources

This policy has been authorised by the Board of Directors. The company may amend or vary this Code of Conduct, in its absolute discretion, from time to time. Company policies and procedures can be located on the intranet.

Approvals

This Code of Conduct is to be approved by the board

Definition

Division	Any part of the business of SWM and SCA
Team Member(s)	Any person employed by any entity within SWM and SCA.
Leader(s)	A Leader is a Team Members direct report.
The Company	Seven West Media and Southern Cross Austereo and all its related entities.
SCA	Southern Cross Austereo and all its related entities.
SWM	Seven West Media and all its related entities.