



SUPPLIER CODE OF CONDUCT

Southern Cross Austereo Pty Ltd ACN 109 243 110 (**SCA**) and our related bodies corporate take care in selecting suppliers who provide us with goods and services. SCA is committed to conducting its business in a manner that upholds social, environmental and ethical standards of operation, and we expect our suppliers to conduct their operations in a similar manner.

This Supplier Code of Conduct (**Code**) establishes SCA's expectations in relation to the minimum standards of behaviour required of all our suppliers in their business operations.

SCA's suppliers are expected to operate in accordance with all applicable laws and regulations in the jurisdictions in which they operate, as well as where services are performed and goods are manufactured, including the *Modern Slavery Act 2018* (Cth), and to uphold the standards embodied in relevant codes of practice relating to anti-slavery and human rights. These include the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's Core Labour Standards and the Universal Declaration of Human Rights.

SCA expects all suppliers, and their respective supply chains, to comply with this Code and to maintain appropriate systems and processes to support and monitor compliance. Suppliers are also expected to ensure that their related entities, employees, sub-contractors and own suppliers are aware of, understand, and adhere to the requirements of this Code.

1. ETHICAL BUSINESS PRACTICES

Suppliers are expected to:

- conduct their business ethically, including in their relationships, practices, sourcing, and operations;
- act honestly, responsibly and transparently and conduct themselves in a fair and professional manner that will not bring SCA into disrepute;
- comply with all applicable laws and regulations, including those relating to anti-bribery, anti-corruption, anti-money laundering and fraud;
- not engage (either directly or indirectly) in any fraudulent, corrupt, exploitative or collusive activities, and maintain appropriate policies and procedures to prevent such activities;
- keep true and particular accounts and records of all goods or services provided to SCA in accordance with all applicable laws and requirements, including all supporting materials used to generate relevant invoices;
- observe all applicable sanctions, boycotts, trade bans and other restrictions applicable to jurisdictions in which they and their supply chains operate; and
- maintain a grievance process for workers to report misconduct, violations, grievances or other concerns related to modern slavery, without fear of retaliation or other adverse consequences.

2. CONFLICTS OF INTEREST

Suppliers must:

- not engage in any conduct intended to entice or obtain any unfair or improper advantage;
- not offer or provide any financial or non-financial benefit to any SCA employee; and
- declare to SCA any actual, potential or perceived conflict of interest that exists, or is anticipated, in connection with its dealings with SCA, and manage these appropriately.

3. LABOUR, HUMAN RIGHTS & MODERN SLAVERY STANDARDS

SCA is opposed to all forms of modern slavery, including trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, child labour and deceptive recruiting for labour or services, both in its own activities and within its supply chain. Suppliers must conduct their operations in a way that respects, protects and fulfils human rights and freedoms and must not engage or be complicit in any practices of modern slavery. Specifically, suppliers are expected to:

- ensure that employment is freely chosen and that all work is undertaken without coercion;
- ensure the humane treatment of workers, including providing fair and safe working conditions that are free from actual or threatened violence, bullying, discrimination, harassment, victimisation, inhumane treatment or abuse in any form, and comply with all relevant laws;
- ensure that their operations are free from any forced, bonded or involuntary labour, slavery or human trafficking, and any other punishment or abuse (including physical, sexual, or psychological), whether actual or threatened;
- employ only workers who are the applicable minimum legal age, and that any worker under the age of 18 is not employed in any hazardous work;
- follow applicable laws and regulations with respect to wages, working hours, benefits, workers compensation, leave entitlements and other benefits;
- ensure the timely payment of wages, not use wage deductions as a disciplinary measure, pay workers equal pay for equal work and promote equality of opportunity and treatment;
- ensure there are processes in place for people to raise concerns and that any matters arising are appropriately addressed;
- proactively identify, address and, where required by legislation, report on risks of modern slavery practices in their business operations and supply chains, including training of staff where appropriate; and
- respect the rights to freedom of association and collective bargaining to support decent working conditions.

4. HEALTH AND SAFETY

Suppliers are expected to:

- comply with all applicable laws relating to workplace health and safety;
- provide a safe work environment for their employees and anyone else affected by their operations;
- actively and appropriately identify and manage occupational health and safety hazards; and
- provide workers with regular and recorded job-related health and safety training.

5. NON-DISCRIMINATION, DIVERSITY, INCLUSION AND EQUAL OPPORTUNITY

Suppliers must ensure their employment and workplace practices are free from discrimination and comply with all applicable anti-discrimination and equal opportunity laws. In particular, suppliers must not discriminate on the basis of race, colour, religion, national or ethnic origin, immigrant status, sex, pregnancy, marital or family status, age, disability, sexual orientation, gender identity, intersex status, or any other status protected by applicable laws.

SCA expects suppliers to foster a culture of diversity and inclusion, including fair treatment, equal opportunity, and respect for all employees across their operations and supply chains.

6. ENVIRONMENTAL IMPACT

Suppliers must as a minimum comply with all applicable laws, standards and notices from regulators, as well as any management and reporting obligations, relating to the environmental impacts of their business.

In addition, suppliers are expected to actively minimise the environmental impact of their operations and maintain environmentally responsible policies and practices. This includes, where possible:

- minimising waste, greenhouse gas emissions and pollution;
- conserving the use of energy, water and raw materials;
- maximising recyclable and sustainable materials;
- disposing of all waste, including hazardous waste in a safe and environmentally responsible manner; and
- preventing contamination or damage to the local environment including loss of biodiversity, damage to ecosystems and deforestation.

Suppliers should strive for continuous improvement in environmental performance and, where feasible, align their practices with recognised sustainability standards or frameworks.

7. PRIVACY AND CONFIDENTIALITY

SCA is bound by the *Privacy Act 1988 (Cth)* and takes these obligations seriously. We expect our suppliers to implement and maintain adequate data security measures in order to protect against any unauthorised access, use and disclosure of personal information, including any personal information disclosed to it by SCA. Suppliers are expected to be familiar with and comply with SCA's Privacy Policy, and must not engage in any actions that would cause SCA to breach or act inconsistently with its Privacy Policy.

Suppliers must not improperly use or disclose any of SCA's private, confidential or commercially sensitive information in their possession.

8. SUPPLIER COMPLIANCE

Suppliers must complete SCA's 'Supplier Questionnaire' upon request in respect of their operational practices and comply with any of SCA's other requirements in relation to this Code.

Suppliers must monitor their compliance with this Code and notify SCA as soon as practicable if they become aware of a reasonable risk of breach, an actual breach or allegations of non-compliance or investigation into non-compliance by any authority.

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Suppliers are expected to take reasonable steps to implement a timely and effective process to address, remedy and prevent the recurrence of any breach of this Code and should periodically evaluate their supply chain in relation to compliance with this Code. SCA may also periodically review or audit a supplier's compliance with this Code. In this event, suppliers are expected to co-operate and provide any information or documentation SCA reasonably requires.

The requirements set out in this Code are important to SCA. We will aim to work with suppliers to develop and implement corrective action plans where possible. However, material non-compliance or continued non-compliance with this Code may lead SCA to disqualify a potential supplier or terminate our business relationship with a supplier.

9. RAISING CONCERNS

Any person, including a supplier, can raise concerns about any suspected or actual breach of this Code by emailing companysecretary@sca.com.au. If a person does not feel comfortable raising their concern directly with SCA, they may contact SCA's Whistleblower provider on 1300 788 712 or at info@yourcall.com.au.

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