

Environmental, Social and Governance (ESG) Policy

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Nine Chief Financial Officer

Required Reviewer

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1. About Our Business

Nine Entertainment Co. Holdings Ltd ("Nine" or "NEC") is Australia's largest locally owned media company – the home of trusted and loved brands spanning News, Sport and Entertainment, we pride ourselves on creating the best content, accessed by consumers when and how they want.

Nine's values are Walk the Talk, Turn Over Every Stone and Keep It Human. In this context, these values inform our approach to identifying Environmental, Social and Governance (ESG) issues which are relevant to our business and developing steps which Nine can take to further our ESG goals. For example, we keep it human by considering ESG issues which may impact on our people and our audiences in our decision making, we turn over every stone in providing trusted journalism, and we walk the talk in how we manage and protect sensitive data.

2. ESG Mission Statement

We are committed to operating responsibly to drive and influence the greatest possible positive impact for our people, our community, and the planet. At Nine, we recognise that our audience, employees, community and investors are looking to and for companies that engage in responsible business practices, including addressing the ESG issues and opportunities that most impact the success of Nine.

We are seeking to embed ESG considerations into how we do business and ensure that responsible thinking is built into the consideration of how we develop and deliver content. Nine understands the importance of ensuring that, wherever possible, we operate with the intention of driving positive impact for our community. We aspire to leave our communities and the planet in a better position, contributing to the prosperity of future generations.

We define ESG as the set of criteria that underpins our decision-making processes and the actions we take. We understand the key role we play in educating and influencing the community, and so responsible business is fundamental to our long-term success.



ENVIRONMENTAL

Understanding and managing how Nine's operations impact, and are impacted by, the environment we operate in.



SOCIAL

Identifying how Nine affects and is impacted by our people, our audiences, the community and other stakeholder groups.



GOVERNANCE

Managing responsible decision-making, recognising the rights and responsibilities of different stakeholders including the Board, shareholders, and others.

3. Policy Scope

This ESG Policy is intended to provide a framework for how our business applies ESG considerations to the activities we undertake. We aim to work in partnership with our people, our audiences, our advertisers and our suppliers to drive a positive impact.

Our ESG Policy reflects the maturity of Nine's ESG journey. As our ESG focus grows, this policy will be updated to mirror these changes and development. Our ESG program is underpinned by a materiality assessment, which will be reviewed as our approach matures. Nine's ESG program includes refining the ESG strategy for the group, determining a direction on reporting and disclosure, and identifying initiatives to drive environmental, social and governance outcomes.

4. ESG Topics of Focus

An ESG Materiality Assessment conducted in 2021 identified a number of material topics. This has been reviewed in 2025, with the current material issues now shown in Figure 1. From these topics, the six most material areas of greatest importance to our stakeholders and impact to our business were identified as a focus for our program.

These topics will form the focus for our ESG strategy and program from 2025.

Facilitating trusted Community engagement and contribution Shifting consumer Culture preferences and investor sentiment Diversity and inclusion Increasing climate Data Security regulation and policy ESG Disclosure and Transparency Increased costs in the transition Anti bribery, Anti corruption Board diversity Employee health safety and well being Talent High digital energy use Development Importance to stakeholders Consumer privacy Resilience to extreme weather events Social Governance Environment

Figure 1: Nine ESG Materiality Map

The key material topics identified as a priority for our program are:

Governance

Impact on Business

- 1. Facilitating trusted journalism;
- 2. Consumer data security and privacy;
- 3. Ethical corporate conduct and regulatory obligations, including: avoiding modern slavery, anti-bribery and corruption

Social

- Community engagement and contribution;
- 5. Diversity and inclusion;

Environmental

6. Carbon Emissions

ESG disclosure and transparency

To ensure the success of our ESG program, appropriate governance to promote disclosure and transparency will be paramount. As we progress through developing our ESG program and strategy, we will look to engage in industry disclosure frameworks which are relevant to our stakeholders.

We understand the importance of transparent reporting, both internally and externally, and are committed to expanding our sustainability reporting to allow stakeholders to track the performance of our business against our identified priorities in ESG.

4.1. Governance

4.1.1. Facilitating trusted journalism

As a public facing media outlet, it is important that we promote trusted journalism. We have, in place, governance frameworks that ensure truthfulness, accuracy, objectivity and independence of editorial decision making from commercial decision making. These frameworks include the Fairfax Charter of Editorial Independence which Nine's Board has endorsed. We acknowledge that if Nine ceases to provide accurate and independent journalism, we will lose our audience and readership, due to a lack of credibility as a news provider.

Our approach is underpinned by the external frameworks which apply to our journalism activities:

- in relation to our online and print journalism activities, we are committed to complying with the various standards developed by the <u>Australian Press Council</u> in conjunction with its constituent members;
- in relation to our television broadcasting activities, our journalism activities, including handling of personal information, are governed by the <u>Commercial</u> <u>Television Code of Practice</u> and the <u>ACMA Privacy Guidelines for Broadcasters</u>; and
- in relation to our radio broadcasting activities, we are committed to complying with the standards developed by Commercial Radio Australia (CRA), as set out in the CRA Codes of Practice and Guidelines.

4.1.2. Consumer data security and privacy

Nine collects data and information on our consumers, including viewing habits, drivers for viewing choices and other data points. Nine recognises it is critically important that we have in place controls and frameworks to protect our consumers' data and privacy. Without appropriate controls, the business risks losing public faith, social license to operate and shareholder value. As such, ensuring these checks and balances and protections are in place is a key focus of the way we do business and our ESG program.

More details on our approach to gathering, protection and use of personal information can be found here.

As part of complying with our obligations in relation to privacy, Nine has systems, policies and practices which are designed to protect Nine's data from misuse or unauthorised access. These systems, policies and practices are continually reviewed, and our internal experts work with external agencies, to ensure that we are striving for a high level of protection of that data.

4.1.3. Regulatory obligations

Nine ensures that it fully complies with regulations that relate to ethical corporate conduct. Nine's legal team provides advice and oversight on existing and new laws relating to modern slavery, and anti-bribery and corruption. Active steps are taken to ensure that legal obligations are understood and communicated to the relevant parts of the organisation, and clear standards are then documented to ensure compliance.

- in relation to modern slavery, Nine's procurement process includes a check that
 prospective suppliers do not engage in modern slavery practices. This process is
 currently being implemented with all departments and key buyers across the
 organisation and is publicly available.
- in relation to anti-bribery and corruption, Nine is developing a policy that will meet
 the requirements of relevant legislation. Once finalised, the policy will be published
 for all staff. Operationally, steps have been taken to ensure that key suppliers who
 act on behalf of Nine are aware of these legal obligations.

4.2. Social

4.2.1. Community engagement and contribution

We acknowledge that our business interacts with all groups within the community as the public are our direct consumers. As such, we have a responsibility to the community to ensure communication and reporting of news and current affairs is reliable and accurate. To promote these principles, we adhere to industry codes of practice, including those issued by the Press Council and the codes administered by the ACMA which apply to our television and radio broadcasts.

In addition to its news and current affairs content, Nine provides a broad array of entertainment content. Nine strives to provide content which reflects the diversity of our audience and community, both in the talent used and the stories which are told.

In addition, we endeavour to make a positive contribution to the community through our Nine Cares program, which supports local community groups to access advertising and promotion opportunities across Nine's platforms and to enable Nine staff to volunteer with community groups in a variety of roles, including as ambassadors for Nine supported charities. The program is regularly reviewed to ensure that the causes supported align to Nine's vision, and that they receive support of the appropriate nature (e.g. financial, volunteering, or other in kind).

4.2.2. Diversity and Inclusion

For Nine, Diversity and Inclusion covers gender, marital or family status, sexual orientation, gender identity, age, disabilities, ethnicity, religious beliefs, cultural background, socio-economic background perspective and experience. As an Australian media company, we appreciate the diversity of our audience. To ensure we connect with our audience, we are committed to creating a working environment where the diversity of our audience is reflected in a truly inclusive way, and where our people are comfortable expressing their true selves.

We have established structures and frameworks that allow our business to reflect the diversity of the community— in our leadership (including Board), our employee base, our supplier list and the content that we create and disseminate.

These frameworks include having a Diversity & Inclusion Policy that recognises the diversity within our workforce and a number of communities, made up of employees with interests in particular issues relating to diversity (e.g. ability/disability or cultural diversity). The Board sets and monitors progress against measurable objectives to track our performance in engaging, retaining and fostering a diverse and inclusive culture.

4.3. Environmental

4.3.1. Carbon Emissions

Nine acknowledges that climate change is an existential threat that will have increasingly significant environmental, social and economic impacts on all aspects of society. Climate change is already impacting the competitive context within which all companies operate by affecting the availability and demand for resources, products and services, and the performance of day-to-day business operations, physical assets and supply chains. We acknowledge that the scale and complexity of climate change makes it uniquely challenging, especially in the context of economic decision making.

Nine is in the early stages of evaluating the impact of climate change on our businesses and strategies, and follows the Australian Sustainability Reporting Framework and Australian Sustainability Reporting Standards ("ASRS"), which align closely to the recommendations of the Task Force on Climate-related Financial Disclosures ("TCFD").

In line with Australian Sustainability Reporting Standards ("ASRS"), Nine assesses carbon emissions based on the relevant Scope, as follows:

- → Scope 1 direct emissions from sources owned or controlled by the company, such as burning fuel for energy production, industrial processes, or transportation;
- → Scope 2 indirect emissions from the generation of purchased electricity, heat, or cooling that the company uses; and emissions generated by us directly through energy and water consumption, and waste generation at our corporate offices and studios; and
- → Scope 3 all other indirect emissions that occur in the value chain of the company, including both upstream (from activities related to the company's supply chain, such as the transportation of goods and waste disposal) and downstream (from the use and disposal of the company's products or services) emissions.

Nine is committed to an iterative journey to improve its sustainable performance and reduce our carbon emissions footprint. Quantifying and accounting for our footprint is a key component of our ESG program.

We understand the importance of transparent reporting and are committed to expanding our climate-based reporting to allow stakeholders to track the performance of our business. In FY25, we will expand our external reporting to provide details of the following:

- → Nine's climate corporate governance structure, including relevant skills and expertise in the organisation
- → Nine's climate-based risks and opportunities, including the high-level strategies the Group will implement to address these
- → FY25 emissions, across Scope 1, 2 and 3

To date, Nine is a foundation member of the following industry sustainability bodies:

Sustainable Screens Australia (SSA)

SSA is an industry-led initiative dedicated to promoting sustainable practices within Australia's film and television sector. Established to address the environmental impact of screen productions, SSA collaborates with industry leaders to integrate sustainability into everyday production processes, providing resources such as supervisor training programs, carbon calculators, tools and supplier directories to assist productions in reducing their environmental footprint.

Ad Net Zero Australia

Ad Net Zero Australia is a collaborative initiative aimed at reducing the carbon footprint of Australia's advertising and marketing industry, and is supported by key industry bodies including the Australian Association of National Advertisers (AANA), Advertising Council Australia (ACA), Interactive Advertising Bureau Australia (IAB), and the Media Federation of Australia (MFA).

The core of Ad Net Zero's strategy is a five-point action plan designed to guide the industry towards net-zero emissions. By embracing these actions, Ad Net Zero Australia seeks to foster industry-wide collaboration, driving significant progress toward a sustainable future in advertising.

We are committed to expanding the tracking and reporting of our carbon emissions and, over the next 12 months, will develop specific strategies to support the identification of carbon efficiency opportunities and promote practices that drive reductions or avoidance of carbon emissions. This will include determining future carbon reduction goals and defined ambitions under a scientific and responsible framework.