

# Anti-Bribery Policy

Nine Entertainment Co. Holdings Ltd and its wholly owned subsidiaries (**Nine**) are committed to the highest standards of ethical business conduct and to following all applicable laws. We believe in being honest and open, and doing the right thing.

This Anti-Bribery Policy is approved by Nine's Board of Directors and shows our core values. This includes 'Walk the talk', meaning we do what we say and act in the best interest of our community, and 'Keep it human', meaning we are genuine with ourselves and others.

While Nine mainly operates in Australia, which means there is less risk of bribery and corruption occurring, we are still committed to preventing and addressing all types of bribery and corruption, everywhere that we operate.

This policy explains how we prevent and address bribery and corruption. It applies to everyone working for Nine and entities engaged by Nine to act on its behalf, including contractors and other third parties.

We expect our business partners to have similar standards and systems to prevent bribery and corruption.

Following this policy helps us maintain our integrity, which is essential to who we are and how we relate to others.



**Walk  
The  
Talk**



**Turn Over  
Every  
Stone**



**Keep  
It  
Human**

## 1. Who does this policy apply to?

This policy applies to all Nine employees, officers, directors, contractors, consultants, and anyone else acting for Nine.

This policy applies to all of Nine's business activities, such as:

- Interactions with government officials in Australia and other countries.
- Purchasing and bidding processes.
- Donations to charities and political parties.
- Offering and accepting hospitality and gifts.
- Relationships with agents, consultants, and intermediaries.

## 2. Nine's Commitment to Preventing Bribery and Corruption

Bribery and corruption are strictly prohibited, and anyone who violates this policy will face serious consequences.

Nine will take all necessary steps to prevent and address bribery and corruption, and will comply with the *Crimes Legislation Amendment (Combatting Foreign Bribery) Act 2024* (Cth) and any related guidelines.

## 3. What is Bribery and Corruption?

Bribery is offering, promising, giving, accepting, or asking for any financial or other benefit to improperly influence someone's actions or decisions. This often involves a public official and is done to gain or keep business or to get any other unfair advantage.

Corruption is dishonest activity in which a director, employee or contractor of Nine abuses his/her position of trust to receive some personal gain or advantage for him or herself or for another person or entity. It could be intended to benefit Nine, but if there is dishonesty involved in the activity, that may still be corrupt conduct.

Anyone involved in bribery or corruption could face serious criminal and civil penalties. Bribery and corruption can seriously harm Nine's reputation.

## 4. Responsibilities

### 4.1. Roles

- **Board of Directors:** Approves Nine's anti-bribery policy and ensures it is put into practice.
- **Senior Management:** Puts this policy into action, provides the necessary resources, and promotes a culture of honesty.
- **Director of Risk:** Acts as the Compliance Officer, managing the anti-bribery program. This includes assessing risks, organising training, managing due diligence, and leading investigations.
- **All Employees:** Must follow this policy, report any concerns about bribery or

- corruption, and complete required training.
- **Third Parties:** Agents, contractors, suppliers, and all business partners must have their own systems to prevent bribery and corruption.

## 4.2. Specific obligations

You must not:

- offer bribes or any improper payments or benefits to government officials;
- engage in dishonest conduct, to gain a benefit for Nine, yourself or any other person;
- pay secret commissions to those acting in an agency or fiduciary capacity; or
- arrange for Nine to make political donations without approval from the Chief Executive Officer.

## 4.3. Gifts and Hospitality

Nine is committed to conducting business ethically and professionally, and this extends to the offering and acceptance of gifts and hospitality. While these can be legitimate tools for building relationships, they must never be used to improperly influence decisions or gain an unfair advantage.

You must strictly follow Nine's Gifts and Benefits Policy and Procedures when giving or receiving gifts and hospitality related to your work. That policy provides detailed guidance on what is permissible, including thresholds and approval processes.

It is crucial that any gift or hospitality offered or accepted is always:

- Legal and appropriate to the intended business purpose.
- Modest or token in value and scale.
- Not intended to reward or encourage special treatment, or offered in exchange for business or business information.
- Not cash, loans, or personal cheques.
- Not solicited for personal benefit.

You must be particularly vigilant when interacting with government officials and regulatory bodies such as the Australian Communications and Media Authority (ACMA), the Australian Competition and Consumer Commission (ACCC), and the eSafety Commissioner. Even modest gifts or hospitality in these contexts can be perceived as an attempt to improperly influence decisions.

Always ask yourself if accepting a gift or hospitality may damage Nine's reputation or place Nine under some obligation. If you are unsure whether something is appropriate or requires approval, speak to your People Leader or a People & Culture representative ([peopleandculture@nine.com.au](mailto:peopleandculture@nine.com.au)).

## 5. Reporting Concerns

You must report any known or suspected bribery or corruption. You can report these concerns through the channels outlined in Nine's Whistleblower Policy. Nine will protect whistleblowers from any negative consequences and will handle all reports seriously and confidentially.

## 6. Investigation and Enforcement

The Compliance Officer or an appointed investigator will thoroughly investigate all reports of bribery or corruption, following Nine's Whistleblower Policy. If this policy is violated, it will lead to disciplinary action, which could include termination of employment or contracts.

## 7. Training and Communication

Nine will inform all employees about this policy and, where appropriate, provide training to help you identify and report any concerning behaviour. Training will be customised for different roles and levels of risk.

## 8. Review

This policy will be reviewed regularly to ensure it is effective and follows meets the requirements of all relevant laws and regulations. It will also be reviewed if there are changes in industry practices or Nine's business operations.

## 9. Document Control

Policy Owner	
General Counsel & Company Secretary	
Approved By	
Name: Nine Board	Date: 17 July 2025
Related Policies and Documents	
<ul style="list-style-type: none"><li>• Code of Conduct</li><li>• Whistleblower Policy</li><li>• Gifts and Benefits Policy and Procedures</li></ul>	
Governance	
Review Frequency: Every two years Board Approval Required: Yes	