Nine

Code of Conduct

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Our values


Walk the
Talk


Turn Over
every Stone


Keep it
Human


Move Forward
as One

What is the Code of Conduct?



Nine

At Nine, we believe in making a meaningful difference, not just through the work we do, but in how we do it.

Everyday our stories, content, and services reach millions across Australia. That's an incredible opportunity — and a shared responsibility.

This Code of Conduct reflects who we are and how we work together. It's more than just a set of rules — it's a guide that connects our purpose and values to our everyday actions. It helps us create a workplace where everyone feels respected, safe, valued, included and empowered to bring their best.

This Code of Conduct is built on our core values:

- **Walk the Talk:** We act with integrity and lead by example.
- **Turn Over Every Stone:** We are curious, ask questions, and pursue the truth.
- **Keep it Human:** We treat each other with respect and empathy.
- **Move Forward as One:** We succeed together, collaborate across boundaries, and put collective progress above individual agendas.

When we act with integrity and treat each other with respect, we build trust with our audiences, our colleagues, and ourselves. That trust is at the heart of our success.

Our Code guides our daily work and shows us how to put our commitment to proper and ethical business practices into action. We believe consistent and ethical business conduct creates loyalty and trust with our stakeholders and each other, and leads to long-term business success.

More than following the rules, you are expected to make good decisions

Our Code goes further than following rules. It asks you to stop and think about what's right, to consider your options and to make good decisions that follow the spirit and intent of our Code.

Sometimes the Code asks for an even higher standard than the law

Of course, we must comply with applicable laws. However, if our Code requires a higher standard of behaviour than local laws, rules, customs or norms, we follow our Code..

Please note that other Policies set standards of behaviour, which will be relevant to personal work-related concerns, including allegations of bullying, harassment, and discrimination. Those concerns are handled under the Complaints Handling Guidelines.

Does the Code apply to you?

This Code is endorsed by our Board and applies to everyone who represents Nine, including employees, directors, contractors, consultants, interns, freelancers and volunteers.

It's important that everyone at Nine understands and embraces the Code, both in spirit and in detail. It applies to all work-related situations — whether in the office, at an event, or online. The Code is also backed up and supported by other Policies that will be referenced throughout this Code.

If something goes against this Code, we'll work to understand what happened and respond fairly and thoughtfully. That might involve providing guidance, support, or, where needed, taking disciplinary action.

Our Suppliers must also comply with our **Supplier Code of Conduct** which can be found on our website.

How do we put the Code into practice?

Our Code helps us make the right decisions — every day, in every part of Nine. It's here to guide how we work with each other, our audiences, partners, and the communities we serve.

- Comply with our Code, policies, guidelines, procedures and the laws that apply to our work
- Leading by example - making ethical, respectful choices and support your team to do the same
- Seek advice if there is any doubt as to the proper course of action
- Promptly raise known, or potential, breaches of our Code or applicable laws (including under the Whistleblower Policy, if applicable)
- Cooperate fully in any investigations of possible breaches of our Code, including in relation to your own behaviour
- Not retaliate against another person for reporting actual, or suspected, breaches of our Code
- Show leadership and commitment to ensure that everyone complies with our Code
- Learning continuously — Stay up to date by completing all required training and compliance activities.
- Ensure any suppliers or contractors you engage are aware of and comply with this Code, as well as relevant policies, guidelines and laws

Any questions about our Code, or concerns about actual or potential breaches, should be promptly raised (including under the Whistleblower Policy, if applicable). It might seem easier to keep silent or look the other way, but our commitment to working according to our values means we must always address issues that need our attention.

The way we work with each other

Our success depends on creating a workplace where everyone can be at their best. We have a responsibility to each other, to our stakeholders and to our audiences to foster a culture of inclusivity, respect and trust. This means that we:

- **Uphold and live our values**: We let them guide our actions
- **Act with integrity:** Be honest, ethical, fair and trustworthy in all your dealings
- **Are respectful:** We treat others with courtesy, care and consideration
- **Create a safe, inclusive environment:** We never act in a way that is intimidating, belittling, bullying or harassing
- **Use our influence to empower and support:** We never abuse our position or authority
- **Embrace diversity:** We are respectful of others and considerate of alternate points of view
- **Engage constructively with difference:** Listening with curiosity, seeking understanding, and working through disagreements with care and professionalism.
- **Are accountable:** We celebrate our wins and own our mistakes by correcting them promptly, we support each other to learn and grow together, knowing our success depends on moving forward as one.

Our Responsibilities

We each have responsibilities under this Code, both as individuals and as a collective. Leaders, because they manage and support other employees, have additional responsibilities. By collaborating and moving forward as one, we ensure that our actions are consistent, ethical, and aligned with our shared values. The below table gives you a sense of these responsibilities at each level:

YOU	YOUR LEADER	NINE
Understand our Code **Apply** it to your decision-making	**Model** behaviour consistent with our Code **Explain** our Code to our people	**Lead** ethically **Educate** our people about our Code
Be alert to unacceptable behaviour **Think:** what can I do?	**Monitor** business practices **Ensure** awareness of and compliance with our Code	**Encourage** awareness and good decision-making **Review** compliance with our Code
Ask if in doubt **Speak up** about concerns or potential breaches	**Support** our people if they speak up **Respond** to legitimate concerns and questions raised	**Investigate** reports of unethical behaviour **Take action** if an issue is raised

Not sure what to do – Try the Quick Test

Try the quick test when making a decision:

- **Values:** Does it fit with our values?
- **Law:** Is it legal and in line with our policies, guidelines and procedures?
- **Impact on Others:** Imagine what it would be like on the receiving end of the decision/action?
- **Reasons:** Do you have all the information that is significant to the decision you are about to make, and would you be confident in explaining your actions to senior management or external authorities?
- **Reputation:** What would your family, colleagues or manager say about the decision you are about to make?
- **Media:** How would you feel if your decision were reported in the media?

How can you seek guidance on the application of the Code?

We encourage you to seek guidance whenever you're unsure about the right course of action. If you are unsure about any part of our Code, need support regarding compliance with the Code or reporting wrongdoing, or if you believe our standards under the Code are not being met, you are encouraged to contact the following departments and support areas:

- Your Leader or Executive Team member
- People and Culture via peopleandculture@nine.com.au
- General Counsel or Nine's Legal Department
- Your Call Nine's whistleblower channel, to report inappropriate behaviour on freecall **1800 197 069** (AU) or **0800 123 508** (NZ)
- Incident and Hazard Reporting

What happens if the Code is Breached?

When concerns about possible Code breaches are brought forward, they will be reviewed, and we'll work to address them in a supportive and constructive way. In the spirit of **"Turn Over Every Stone"** this may involve a conversation, a review or an investigation. If a breach of the Code is identified, we'll address it with action and seek to determine the best way forward to improve. This may include (where appropriate):

- A discussion about expected standards of behaviour
- An oral or written warning
- Counselling
- Change in duties
- Suspension or termination of employment
- Referral to external investigatory and enforcement authorities

Ethical business practices



Nine

We do not engage in or condone corrupt, illegal or unethical business practices. Our reputation gives our customers, viewers, investors, partners, supply chain and the communities we work in the confidence to trust and do business with us. Our commitment to ethical business practices reflects our values of '**Walk the Talk**' and '**Move Forward as One.**' We act with integrity and in alignment with each other to ensure trust and collaboration in all our dealings.

I WILL...	I WILL NOT...
• Ask for advice if in doubt about a payment or gift I have been offered or wish to make • Immediately report any requests for bribes or facilitation payments • Immediately report concerns about bribery and corruption • Implement plans to prevent circumstances where bribery or corruption may occur • Record all financial transactions accurately	• Offer or give bribes, including payments, gifts, favours or other benefits, to gain an improper business advantage for Nine, myself or anyone else , such as winning or keeping business, avoiding a penalty or accessing confidential information. • Offer or make facilitation payments, including where permitted under the local law of my project or work. • Accept or ask for money, gifts or anything of value offered in return for an improper business advantage, such as kick-backs or secret commissions. • Ask a third party to do something that Nine is not permitted to do, unless legally allowed or required (eg, external audits or certifications) • Request a supplier or subcontractor to provide a private supply or service.

We follow Nine's policies and use sound judgment when offering or accepting gifts and hospitality, ensuring our conduct is always ethical and professional.

Modest or token gifts may be acceptable, as long as they are legal and appropriate to the intended business purpose. You must also follow Nine's Gift and Benefits policy. If you are unsure if a gift or entertainment is considered "modest or token", speak to your Leader or a People & Culture representative (peopleandculture@nine.com.au). It's also important that you don't seek any special advantage because of your position at Nine. That means not soliciting discounts, upgrades, tickets, travel, meals and accommodation for your personal benefit. As a general rule, avoid anything that could appear improper.

If you attend an entertainment event for work, either as a guest or host, it should be moderately scaled and clearly for business purposes.

I WILL...	I WILL NOT...
• Ask myself if accepting a gift or hospitality may damage Nine's reputation or place us under some obligation • Be aware of, and comply with, the Nine policies and procedures before giving or accepting gifts or hospitality • Ask my Leader if I'm not sure whether something is appropriate or if I require approval under the Nine Gifts and Benefits Policy.	• Accept or offer gifts or hospitality that reward or encourage special treatment or are in exchange for business or business information • Accept or offer gifts of cash, loans or personal cheques • Accept or offer payments, benefits or discounts from business partners that are not available to all employees • Ask for a gift or hospitality • Accept or offer gifts or hospitality that are inappropriate, or which may give rise to an actual or perceived conflict of interest.

We avoid situations where our personal interests conflict with company interests.

We face a conflict of interest when personal and business interests compete, compromising our independence. We want to avoid these situations where possible, and manage them when they're unavoidable.
We aim to maintain a reputation for operating to the highest standards as a team. This means avoiding situations where your personal interests might clash with Nine's is important. It also means being aware of circumstances where others might perceive a potential conflict.

We know you have a life outside of Nine, and we actively encourage your participation in community activities and professional associations. We know some people have more than one job. Remember, those outside activities shouldn't interfere with your work at Nine or create conflicts of interest.

By being transparent and proactively addressing potential or actual conflicts of interest, we demonstrate our commitment to **"Walk the Talk"**, **"Keep it Human"** and **"Move forward as One"** by ensuring fairness and trust in our relationships.

What are the guidelines for workplace relationships?

Relationships happen—we get it. Sometimes, a personal or family relationship may exist (or develop) between team members, including between a Leader and someone in their reporting line, or anywhere within Nine. When that happens, it can create challenges—both real and perceived—around fairness, influence, or decision-making.

We're not here to police your personal life, but we do expect transparency and professionalism. That means:

- **Flag it early:** If you're in a relationship that might create a conflict of interest, let your Leader or the People & Culture team know.
- **Keep it fair:** Don't let personal relationships affect how decisions are made, how work is distributed, or how others are treated.
- **Stay professional:** Maintain the same standards of conduct and judgment you'd expect from others.

Being open and proactive helps us build a culture of trust. It shows we **"Walk the Talk"** and **"Keep it Human"**—ensuring fairness, inclusion, and respect for everyone at Nine.

I WILL...	I WILL NOT...
• Ask myself if I have a conflict of interest due to personal relationships, investments, organisations I belong to, or other activities. • Disclose any conflict of interest to my Leader • Speak to my Leader if I am unsure whether my situation might be, or appear to be, a conflict of interest. • Ensure that my outside interests do not interfere with my ability to perform my job. • Speak to my Leader and obtain written approval from Nine's General Counsel if the external opportunity is with an organisation that has a direct business relationship with Nine. • Act professionally if a personal relationship changes.	• Be involved in decision-making if a conflicting interest may influence my ability to make an objective decision • Directly employ relatives, close friends, or associates • Be involved in any business dealings or personal relationships that may create the appearance of a conflict of interest • Use my position or influence to give another person a better deal than others • Act in any way involving coercion, harassment, or retaliation if a relationship at work ends.

We operate fairly within our governing laws.

We will comply with relevant laws and ethical requirements when working at Nine. This might include laws related to:

- Broadcasting
- Defamation
- Employment
- Health and safety
- Equal opportunity and discrimination
- Privacy
- Competition and consumer protection
- Corporate governance (including insider trading laws - buying or selling shares when you have confidential information relevant to the value of those shares)
- Tax

Operating fairly and within the law reflects our values of **"Walk the Talk," "Turn Over Every Stone,"** and **"Move Forward as One."** We are committed to doing business the right way, ensuring compliance in all our operations, and working together as one organisation to uphold these standards consistently

I WILL...	I WILL NOT...
• Ask myself if my business or personal interactions align with relevant laws and Nine's policies • Understand and comply with the laws that apply to my work and responsibilities • Stay informed about key areas relevant to my role such as defamation, consumer protection, anti-competitive conduct, employment, and privacy. • Seek guidance when I am unsure about a legal or ethical obligation. • Report any concerns or potential breaches of the law or Nine's policies through the appropriate channels. • Promote a workplace culture that values integrity, safety, fairness, and	• Ignore or overlook laws or ethical requirements related to my role or business. • Engage in conduct that could breach legal or regulatory obligations. • Withhold concerns about possible legal or policy breaches. • Assume that something is okay without checking if it complies with the law and Nine's policies. • Participate in or condone behaviour that undermines legal compliance or ethical standards. • Engage in any activity that may involve, or be perceived to be, insider training

Government & media relations



Nine

As Australia's largest locally owned media company, Nine has a considerable profile across the country. This naturally leads to significant interest from media organisations regarding our dealings. It also means we play a role in actively engaging with Government bodies regarding the rules and legislation that shape our industry.

With this in mind, we have dedicated teams and channels to lead our communication with regards to media enquiries and to build open and constructive relationships with Government stakeholders.

Our approach is guided by our value of **"Walk the Talk."** We are committed to open and honest communication in all our interactions. It is important that we let our Government & Media Relations teams lead such communications and not seek to speak on behalf of Nine without approval to do so.

If you are ever approached for comment by a journalist or government representative, or are unsure of how to respond to a request for information from someone external to Nine, speak to your Leader in the first instance.

I WILL...	I WILL NOT...
• Follow Nine's procedures regarding who is allowed to communicate with governments, regulators and public authorities • Ensure that all information provided to governments, regulators and public authorities is accurate and appropriate • Immediately report any regulatory investigations involving Nine to Nine's General Counsel	• Have dealings with governments and public authorities that are unethical or illegal • Speak on behalf of Nine without explicit authority to do so • Discuss or disclose Nine's confidential information or internal dealings

We communicate regulatory information about Nine accurately and through authorised spokespeople.

Nine has a Disclosure Policy that provides guidelines for making public comments and statements about regulatory matters that comply with obligations under the Corporations Act 2001 (Cth) and the ASX Listing Rules. If you are authorised by Nine to make a public statement, you must follow the rules of the Nine Disclosure Policy relating to information to regulators and other third parties. Information must always be accurate and provided only by authorised spokespeople.

Ensuring accurate and authorised communication reflects our value of **"Walk the Talk."** We are committed to transparency and accuracy in all our public statements.

I WILL...	I WILL NOT...
Ensure any information I am required to provide, on behalf of Nine is: • Accurate and delivered by an authorised spokesperson • Approved as required by Nine's Legal Department or Regulatory, Public Affairs and Communications Department, after giving them all relevant information to assess the request	• Make public disclosures if I'm not authorised to do so • Disclose inappropriate or inaccurate information that may damage the reputation of Nine

We will not make political contributions.

Everyone has the right to participate in the political process. Still, to maintain our independence and integrity in our markets, any political contributions you make and activities you engage in must be kept strictly personal and separate from Nine.

I WILL...	I WILL NOT...
• Ensure that any involvement on behalf of Nine in political events or activities has been properly approved and is for policy dialogue and business briefing purposes only • Ensure that any such events attended are noted by the Government and Regulatory Affairs Team, so any required disclosure can be made • Obtain approval from my Leader if I intend to run for public office, and, if required, apply for leave during campaigning and if carrying out the duties of public office during regular working hours • Make it clear that my opinions and any personal donations I make don't represent Nine.	• Make contributions on behalf of Nine to political parties, politicians, officials or candidates for public office at any level of government, including local government without the approval of the CEO and General Counsel • Be involved in political activities that damage my own or Nine's reputation or create a conflict of interest • Be involved with prohibited political groups or activities, or make prohibited political contributions

Use of Nine's assets, resources & communications systems



Nine

We respect and protect Nine's assets and resources. Our assets are essential to our business and include our facilities, equipment, materials and supplies, and computer and telephone networks. They also include intellectual property – our ideas and know-how, customer and supplier information, and market data. We understand that you might use company property, such as computers and phones, for personal use from time to time. Any personal use should be reasonable and comply with Nine's IT policies and should not negatively impact Nine's interests.

To the extent permitted by law, Nine may monitor or audit use of its Technology and Data and access, review and disclose data stored on its systems. These activities may be undertaken for: maintenance; to meet business needs; during an investigation of suspected or reported breaches of policies, procedures or the law; or to meet a legal or policy requirement.

We must all use our best efforts to protect Nine's assets and other resources, including plant, equipment, and other valuable property, including confidential Information and intellectual property such as trademarks, registered designs and copyrighted material, from loss, theft and unauthorised use.

Protecting and using Nine's assets & communications systems responsibly reflects our value of **"Walk the Talk."** We act responsibly and ensure the sustainability of our resources.

I WILL...	I WILL NOT...
• Use company property and resources only for work-related purposes, unless reasonable personal use is approved or allowed under relevant policies • Keep company assets safe and protect them from being lost, misused, stolen or damaged • Store all confidential information securely • Promptly report misuse or theft of company assets • Always follow Nine's policies, guidelines and procedures when using Nine's Technology and Data	• Defraud Nine, for example, by falsely claiming expenses not incurred for approved business purposes. • Misuse company funds, for example, by asking subcontractors to work for me privately and charging this to Nine. • Knowingly damage or misappropriate the assets of others (including physical and intellectual property) • Allow unauthorised people to access our facilities or use our assets • Disclose confidential information (including intellectual property) without proper authorisation or approval • Publish, discuss in public or disclose to unauthorised parties any commercially confidential information and proprietary information belonging to Nine or any subcontractors, suppliers, business partners • Use Nine's Technology for excessive personal use. • Use Nine's Technology for unlawful or unapproved activities (including bullying ,harassment or vilification)

We accurately report and disclose

All information created and maintained due to our business activities must accurately reflect the underlying transactions and events. We're committed to accurate and transparent financial reporting, especially in our public reports. With this in mind, you must: report any concerns about inaccuracy in reporting.

Our commitment to accurate reporting reflects our values of **"Walk the Talk"** and **"Turn Over Every Stone."** We believe in transparency and accountability in all our disclosures.

I WILL...	I WILL NOT...
• Immediately report any concerns I have regarding the validity of any reporting process or record-keeping activity • Make an Immediate report if I believe I am being asked to create false or misleading information • Ensure that all material financial information and disclosures are accurately represented in Nine's accounts • Comply with relevant laws and accounting standards. • Fairly and accurately reflect transactions in any financial reports	• Falsify, conceal, alter, or otherwise tamper with information, or create misleading information. Such conduct may constitute fraud and may result in civil or criminal liability for me and for Nine. • Misrepresent financial transactions or any other transactions or events, as this may constitute falsification of Company records and/or fraud • Destroy, deface, or make unrecoverable documents that are, or are likely to be, the subject of litigation or any regulatory investigation • Try to influence, coerce, manipulate or mislead Nine's auditors

Whistleblower policy



Nine

Our Whistleblower Policy is available via the Nine website. It contains essential information for anyone who wishes to report a business misconduct issue.

Please note that personal work-related concerns and complaints are dealt with separately under Nine's Complaints Management Guidelines.

Your confidentiality will be respected.

When you report known or reasonably suspected business misconduct under the Whistleblower Policy, your identity will be disclosed only with your consent, or as otherwise permitted under applicable laws. The information you provide will be disclosed only on a 'need-to-know' basis to investigate and address the concern appropriately.

You may choose to remain anonymous when raising a concern (in which case, you should advise this when you raise your concern). However, it may be easier to investigate problems and provide follow-up if you identify yourself.

Where you choose to remain anonymous, applicable laws will keep your identity confidential. In some circumstances, it may be reasonably necessary to disclose certain (de-identified) information to investigate the concern raised, or to obtain legal advice or representation in accordance with applicable laws. We may also be required by law to disclose information you provided.

Our Whistleblower Policy and our commitment to protecting those who report concerns reflect our values of **"Walk the Talk," "Keep it Human,"** and **"Move Forward as One."** We encourage transparency, provide a safe environment for our people to speak up, and strengthen trust by addressing concerns together as one organisation.

If you raise a genuine concern, you'll be supported.

You do not have to be sure that your information is accurate to raise a concern, and you will not be penalised if a concern raised by you ultimately turns out to be incorrect if your disclosure was made with a reasonable belief or suspicion as to its accuracy. However, you must not make a report that is false or malicious. Disciplinary action up to and including termination of employment may be taken against anyone who makes a false or malicious complaint.

Nine does not condone any form of retaliatory action being taken against anyone in connection with raising a business misconduct or conduct concern with a reasonable belief or suspicion as to its substance.

How to make a Whistleblower report

To make a Whistleblower report, you should contact Nine's General Counsel, or other staff listed in the Whistleblower Policy.

You can also contact Your Call (1800 197 069 (AU) or 0800 123 508 (NZ)). Your Call is an external hotline through which you can report inappropriate workplace behaviour. These reports can be made anonymously. This service is available on 1800 197 069 (AU) or 0800 123 508 (NZ) (7am-midnight on business days) or via www.yourcall.com.au/nine.

This is an independent service that is set up to receive reports of inappropriate conduct at Nine, including on an anonymous basis if that is your preference.

We encourage our people to speak up, in line with our values of **"Turn Over Every Stone"** and **"Keep it Human."** We are committed to addressing concerns thoroughly and respectfully.

Further guidance and resources

In addition to this Code, you are required to comply with Nine's other policies, guidelines and procedures. These policies, guidelines and procedures can be located on the Nine intranet which can be accessed by all employees.
Together, by living our values — **Walk the Talk, Turn Over Every Stone, Keep it Human,** and **Move Forward as One** — we create a culture of integrity, respect, and shared success. For further guidance and support about compliance of the Code, reporting wrongdoing, or if you believe our standards under the Code are not being met, you are encouraged to contact the following departments and support areas:

- Your Leader or Executive Team member
- People and Culture via peopleandculture@nine.com.au
- General Counsel or Nine's Legal Department
- **Your Call** Nine's whistleblower channel (freecall **1800 197 069** (AU) or **0800 123 508** (NZ))

Relevant & Useful Policies & Guidelines
Bullying, Harassment & Discrimination Policy
Social Media Guidelines
Drug and Alcohol Policy
Sex Discrimination Act
Privacy Policy
Complaints Handling Guidelines
Whistleblower Policy
Nine Diversity & Inclusion Policy
Nine Securities Trading Policy
Annual Leave Guidelines
Leave without Pay Guidelines
Nine Cyber Security Policy
Nine Gifts and Benefits Policy
Nine Disclosure Policy

Relevant Legal or Regulatory Framework:

Australia:
Federal and State-based Anti-Discrimination laws
Work, Health & Safety Act 2011
State based WHS legislation
Federal and State-based Anti-Discrimination laws

New Zealand:
Human Rights Act 1993
Health and Safety at Work Act 2015